

DOCKET NO. 529 – Homeland Towers, 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 Parcel No. 65-002-1, Old Chester Road North, Haddam, Connecticut.	} Connecticut Siting Council
	May 22, 2025

Draft Findings of Fact

Introduction

1. Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless (Applicants), in accordance with provisions of Connecticut General Statutes (CGS) §16-50g, et seq, applied to the Connecticut Siting Council (Council) on January 10, 2025 for a Certificate of Environmental Compatibility and Public Need (Certificate) for the construction, maintenance, and operation of a 140-foot monopole wireless telecommunications facility at Parcel No. 65-002-1, Old Chester Road North, Haddam, Connecticut (refer to Figures 1 & 2). (Applicants 1, pp. 1-2, Attachment 1)
2. Homeland Towers, LLC (HT) is a New York limited liability company with offices at 9 Harmony Street, Danbury, Connecticut. HT currently owns and/or operates numerous tower facilities in Connecticut. HT would construct, maintain and own the proposed facility and would be the Certificate Holder. (Applicants 1, p. 3)
3. Cellco Partnership d/b/a Verizon Wireless (Cellco) is a Delaware Partnership with an office at 20 Alexander Drive, Wallingford, Connecticut. Cellco is licensed by the Federal Communications Commission (FCC) to provide personal wireless communication service to Connecticut. (Applicants 1, pp. 3-4)
4. The Applicants are the only party to this proceeding. (Record)
5. There are no Connecticut Environmental Protection Act (CEPA) Intervenor in this proceeding. (Record)
6. Under Regulations of Connecticut State Agencies (RCSA) §16-50j-16, the Council may add parties and intervenors at any time during the pendency of a proceeding. Any person granted status is responsible for obtaining and reviewing all materials for the proceeding. (RCSA §16-50j-16 (2025))
7. The purpose of the proposed facility is to provide reliable wireless communications services for Cellco customers in the Tylerville section of Haddam. (Applicants 1, pp. 7-8; Attachment 6)
8. Under CGS §16-50p(b), there is a presumption of public need for personal wireless services and the Council is limited to consideration of a specific need for any proposed facility to be used to provide such services to the public. (CGS §16-50p(b) (2025))
9. Also under CGS §16-50p(b), the Council must examine whether the proposed facility may be shared with any public or private entity that provides service to the public if the shared use is technically, legally, environmentally and economically feasible and meets public safety concerns, and may impose reasonable conditions as it deems necessary to promote the immediate and shared use of telecommunications facilities and avoid the unnecessary proliferation of such facilities consistent with the state tower sharing policy. (CGS §16-50p(b) (2025); CGS §16-50aa (2025))

10. Pursuant to CGS §16-50l (b), notice of the application was provided to all abutting property owners by certified mail on January 10, 2025. Two certified mail receipts were not returned from the owners of two abutting parcels. The Applicants re-sent notice to these abutting property owners by first class mail. (Applicants 1, Attachment 4; Applicants 4, response 1)
11. On January 10, 2025, Applicants provided notice to all federal, state and local officials and agencies listed in CGS §16-50l (b). (Applicants 1, Attachment 2)
12. Pursuant to CGS §16-50l (b), Applicants provided public notice of the filing of the application, published in the Hartford Courant on January 28 and 29, 2025. (Applicants 2)

Procedural Matters

13. CGS §1-225a permits public agencies to hold remote meetings under the Freedom of Information Act (FOIA) and the Uniform Administrative Procedure Act. FOIA defines “meeting” in relevant part as “any hearing or other proceeding of a public agency.” (Council Administrative Notice Item No. 61; CGS §1-200, *et seq.* (2025))
14. CGS §1-225a allows public agencies to hold remote meetings provided that:
 - a) The public has the ability to view or listen to each meeting or proceeding in real-time, by telephone, video, or other technology;
 - b) Any such meeting or proceeding is recorded or transcribed and such recording or transcript shall be posted on the agency’s website within seven (7) days of the meeting or proceeding;
 - c) The required notice and agenda for each meeting or proceeding is posted on the agency’s website and shall include information on how the meeting will be conducted and how the public can access it any materials relevant to matters on the agenda shall be submitted to the agency and posted on the agency’s website for public inspection prior to, during and after the meeting; and
 - d) All speakers taking part in any such meeting shall clearly state their name and title before speaking on each occasion they speak.(CGS §1-225a (2025))
15. Upon receipt of the application, on January 13, 2025 the Council sent a letter to the Town of Haddam (Town) as notification that the application was received and is being processed, in accordance with CGS §16-50gg. (Record)
16. Local zoning regulations do not apply to facilities under the exclusive jurisdiction of the Council. Pursuant to CGS §16-50x, the Council has exclusive jurisdiction over telecommunications facilities throughout the state. It shall consider any location preferences provided by the host municipality under CGS §16-50gg as the Council shall deem appropriate. (CGS §16-50x (2025))
17. During a regular Council meeting on February 6, 2025, the application was deemed complete pursuant to RCSA §16-50l-1a and the public hearing schedule was approved by the Council. (Record)
18. Pursuant to CGS §16-50m, on February 7, 2025, the Council sent a letter to the Town to provide notification of the scheduled public hearing via Zoom remote conferencing and to invite the municipality to participate. (Record)

19. Pursuant to CGS §16-50m, the Council published legal notice of the date and time of the public hearing via Zoom remote conferencing in the Hartford Courant on February 12, 2025. (Record; Transcript 1 – March 13, 2025 – 2:00 p.m. [Tr. 1], p. 5)
20. The Council’s Hearing Notice did not refer to a public field review of the proposed site. Field reviews are neither required by statute nor an integral part of the public hearing process. The purpose of a field review is an investigative tool to acquaint members of a reviewing commission with the subject property. (Record; *Manor Development Corp. v. Conservation Comm. of Simsbury*, 180 Conn. 692, 701 (1980); *Grimes v. Conservation Comm. of Litchfield*, 243 Conn. 266, 278 (1997))
21. On February 14, 2025, in lieu of an in-person field review of the proposed site, the Council requested that Applicants submit photographic documentation of site-specific features into the record intended to serve as a “virtual” field review of the site. On March 4, 2025, Applicants submitted such information in response to the Council’s interrogatories. (Record; Applicants 4, response 43)
22. On February 19, 2025, the Council held a pre-hearing conference on procedural matters for parties and intervenors to discuss the requirements for pre-filed testimony, exhibit lists, administrative notice lists, expected witness lists and filing of pre-hearing interrogatories. Applicants participated in the Council’s pre-hearing conference. Procedures for the public hearing via Zoom remote conferencing were also discussed. (Council Pre-Hearing Conference and Remote Hearing Procedure Memoranda, dated February 11, 2025)
23. On February 20, 2025, pursuant to CGS §16-50o, Applicants filed a Motion for Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site. (Record)
24. Pursuant to CGS §16-50p(g), the Council shall in no way be limited by Applicants already having acquired land or an interest therein for the purpose of constructing the proposed facility. (CGS §16-50p(g) (2025); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))
25. The Council’s evaluation criteria under CGS §16-50p does not include the consideration of property ownership or property values nor is the Council otherwise obligated to take into account the status of property ownership or property values. (CGS §16-50p (2025); *Woodbridge Newton Neighborhood Env’t Trust, et al v. Conn. Siting Council*, 2024 Conn. LEXIS 163 (2024); *Goldfisher v. Conn. Siting Council*, 95 Conn. App. 193 (2006))
26. On February 28, 2025, in compliance with RCSA §16-50j-21, the Applicants installed a four-foot by six-foot sign along Old Saybrook Road in the vicinity of the access drive for the proposed site. The sign presented information regarding the proposed telecommunications facility and the Council’s public hearing. (Applicants 5)
27. Pursuant to CGS §16-50m, the Council gave due notice of a public hearing to be held on March 13, 2025, beginning with the evidentiary session at 2:00 p.m. and continuing with the public comment session at 6:30 p.m. via Zoom remote conferencing. The Council provided information for video/computer access or audio only telephone access. (Council’s Hearing Notice dated February 6, 2025; Tr. 1, p. 1; Transcript 2 – March 13, 2025 - 6:30 p.m. [Tr. 2], p. 1)

28. The 6:30 p.m. public comment session afforded interested persons the opportunity to provide oral limited appearance statements. Interested persons were also afforded an opportunity to provide written limited appearance statements at any time up to 30 days after the close of the evidentiary record. Limited appearance statements in this proceeding, whether oral or written, were not provided under oath nor subject to cross examination. (Tr. 1, p. 7; Tr. 2, p. 7; CGS §16-50n(f) (2025))
29. During the public comment session of the Council's hearing held on March 13, 2025, the Town First Selectperson Robert McGarry made an oral limited appearance statement about the proposed facility. (Tr. 2, pp. 11-13)
30. On March 18, 2025, the Council issued a Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site, pursuant to CGS §1-210(b) and consistent with the Conclusions of Law adopted in Council Docket 366. (Record; Tr. 1, pp. 8-10)
31. In compliance with CGS §1-225a:
 - a) The public had the ability to view and listen to the remote public hearings in real-time, by computer, smartphone, tablet or telephone;
 - b) The remote public hearings were recorded and transcribed, and such recordings and transcripts were posted on the Council's website on March 13, 2025 and March 26, 2025 respectively;
 - c) The Hearing Notice, Hearing Program, Citizens Guide for Siting Council Procedures and Instructions for Public Access to the Remote Hearings were posted on the Council's website;
 - d) Prior to, during and after the remote public hearings, the record of the proceeding has been, and remains, available on the Council's website for public inspection; and
 - e) The Council, parties and intervenors provided their information for identification purposes during the remote public hearings.(Hearing Notice dated February 6, 2025; Tr. 1; Tr. 2; Record)
32. The purpose of discovery is to provide the Council, parties and intervenors access to all relevant information in an efficient and timely manner to ensure that a complete and accurate record is compiled. (RCSA §16-50j-22a (2025))
33. In an administrative proceeding, irrelevant, immaterial or unduly repetitious evidence shall be excluded, and an agency has the right to believe or disbelieve the evidence presented by any witness, even an expert, in whole or in part. (CGS §4-178 (2025); *Dore v. Commissioner of Motor Vehicles*, 62 Conn. App. 604 (2001); RCSA §16-50j-25).
34. Pursuant to CGS §16-50n(f), at the conclusion of the hearing session held on March 13, 2025, the Council closed the evidentiary record for Docket 529 and established April 12, 2025 as the deadline for public comments and the submission of briefs and proposed findings of fact. (Tr. 2, p. 14)
35. On April 10, 2025, Applicants submitted a post-hearing brief. (Record)

36. Constitutional principles permit an administrative agency to organize its hearing schedule so as to balance its interest in reasonable, orderly and non-repetitive proceedings against the risk of erroneous deprivation of a private interest. It is not unconstitutional for the Council, in good faith, to balance its statutory time constraints against the desire of a party, intervenor or CEPA intervenor for more time to present their objections to a proposal. (*Concerned Citizens of Sterling v. Conn. Siting Council*, 215 Conn. 474 (1990); *Pet v. Dept. of Public Health*, 228 Conn. 651 (1994); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014))

State Agency Comment

37. Pursuant to CGS §16-50j (g), on February 7, 2025, the following state agencies were solicited by the Council to submit written comments regarding the proposed facility: Department of Energy and Environmental Protection (DEEP); Department of Public Health (DPH); Council on Environmental Quality (CEQ); Public Utilities Regulatory Authority (PURA); Office of Policy and Management (OPM); Department of Economic and Community Development (DECD); Department of Agriculture (DOAg); DOT; Connecticut Airport Authority (CAA); Department of Emergency Services and Public Protection (DESPP); State Historic Preservation Office (SHPO); and Office of Consumer Counsel (OCC). (Record)
38. No state agencies responded with comment on the application. (Record)
39. While the Council is obligated to consult with and solicit comments from state agencies by statute, the Council is not required to abide by the comments from state agencies. (CGS §16-50p(g) (2025); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007)).

Municipal Consultation

40. Pursuant to CGS §16-50l(f), the Applicants commenced the 90-day pre-application municipal consultation process on August 21, 2024, by submitting a Technical Report to the Town First Selectperson. (Applicants 1, p. 18, bulk filing 1-Technical Report)
41. On October 9, 2024, at the request of the Town, Applicants hosted a Public Information Meeting (PIM) at the Haddam Volunteer Fire Department Community Room. The PIM was attended by Town officials and four residents, two of which were associated with the Connecticut River Gateway Commission. Discussion topics included, but were not limited to, construction of the proposed facility, access from town roads, visibility, and need for service. These concerns are addressed in the Environmental Effects and Mitigation Measures and Cellco's Existing and Proposed Wireless Services sections of this document, pursuant to CGS §16- 50p. (Applicants 1, p. 18, Attachment 16)
42. After the filing the application, Applicants had further discussions with the Town regarding the need for service. (Applicants 4, response 2)
43. On March 6, 2025, the Town submitted comments to the Council expressing support for the proposed facility. (Record)
44. On March 5 and March 7, 2025, the First Selectperson and Economic Development Commission of the Town of Chester, which abuts Haddam to the south, submitted comments in support of the proposed facility. (Record)

Public Need for Service

45. In 1996, the United States Congress recognized a nationwide need for high quality wireless telecommunications services, including cellular telephone service. Through the Federal Telecommunications Act of 1996, Congress seeks to promote competition, encourage technical innovations, and foster lower prices for telecommunications services. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
46. In issuing cellular licenses, the Federal government has preempted the determination of public need for cellular service by the states and has established design standards to ensure technical integrity and nationwide compatibility among all systems. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
47. Section 253 of the Telecommunications Act of 1996 prohibits any state or local statute or regulation, or other state or local legal requirement from prohibiting or having the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
48. Section 704 of the Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services and from prohibiting or having the effect of prohibiting the provision of personal wireless services. This section also requires state or local governments to act on applications within a reasonable period of time and to make any denial of an application in writing supported by substantial evidence in a written record. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
49. Section 704 of the Telecommunications Act of 1996 also prohibits any state or local entity from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions, which include effects on human health and wildlife, to the extent that such towers and equipment comply with FCC’s regulations concerning such emissions. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
50. Section 706 of the Telecommunications Act of 1996 requires each state commission with regulatory jurisdiction over telecommunications services to encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans, including elementary and secondary schools, by utilizing regulating methods that promote competition in the local telecommunications market and remove barriers to infrastructure investment. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
51. In December 2009, President Barack Obama recognized cell phone towers as critical infrastructure vital to the United States. The Department of Homeland Security, in collaboration with other federal stakeholders, state, local, and tribal governments, and private sector partners, has developed the National Infrastructure Protection Plan (NIPP) to establish a framework for securing resources and maintaining resilience from all hazards during an event or emergency. (Council Administrative Notice Item No. 11 –Presidential Proclamation 8460, Critical Infrastructure Protection)
52. In February 2012, Congress adopted the Middle Class Tax Relief and Job Creation Act (also referred to as the Spectrum Act) to advance wireless broadband service for both public safety and commercial users. The Act established the First Responder Network Authority (FirstNet) to oversee the construction and operation of a nationwide public safety wireless broadband network. Section 6409 of the Act contributes to the twin goals of commercial and public safety wireless broadband deployment through several measures that promote rapid deployment of the network facilities

needed for the provision of broadband wireless services. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012)

53. In June 2012, President Barack Obama issued an Executive Order to accelerate broadband infrastructure deployment declaring that broadband access is a crucial resource essential to the nation's global competitiveness, driving job creation, promoting innovation, expanding markets for American businesses and affording public safety agencies the opportunity for greater levels of effectiveness and interoperability. (Council Administrative Notice Item No. 12 – Presidential Executive Order 13616, Accelerating Broadband Infrastructure Development; Council Administrative Notice Item No. 24 – FCC Wireless Infrastructure Report and Order)
54. Pursuant to Section 6409(a) of the Spectrum Act, a state or local government may not deny and shall approve any request for collocation, removal or replacement of equipment on an existing wireless tower provided that this does not constitute a substantial change in the physical dimensions of the tower. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012; Council Administrative Notice Item No. 24 – FCC Wireless Infrastructure Report and Order)
55. In June 2020, the FCC issued a declaratory ruling that heights of existing towers located outside of the public right-of-way could increase by up to 20 feet plus the height of a new antenna without constituting a substantial change in the physical dimensions of a tower. (Council Administrative Notice Item No. 28 - Declaratory Ruling and Notice of Proposed Rulemaking, FCC 20-75, June 10, 2020)
56. In November 2020, the FCC issued an order that ground excavation or deployment up to 30 feet in any direction beyond the site boundary of existing towers located outside of the public right-of-way does not constitute a substantial change in the physical dimensions of a tower (Council Administrative Notice Item No. 29, Report and Order, FCC 20-153, November 3, 2020)
57. According to state policy, if the Council finds that a request for shared use of a facility by a municipality or other person, firm, corporation or public agency is technically, legally, environmentally and economically feasible, and the Council finds that the request for shared use of a facility meets public safety concerns, the Council shall issue an order approving such shared use to avoid the unnecessary proliferation of towers in the state. (CGS §16-50aa (2025))
58. The Town Plan of Conservation and Development does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. (Applicants 1, p. 16)
59. On February 7, 2025, the Council sent correspondence to other telecommunications carriers not intervening in the proceeding requesting that carriers interested in locating on the proposed facility in the foreseeable future to notify the Council by March 6, 2025. No carriers responded to the Council's solicitation. (Record)
60. The facility would be designed to accommodate four wireless carriers, including Cellco, the Town and local emergency service providers. The Town and local emergency service responders have not expressed an interest in collocating emergency services antennas on the proposed facility. (Applicants 1, p. 11; Tr. 1, pp. 19-20)

Cellco's Existing and Proposed Wireless Services

61. Cellco has a significant coverage deficiency in its wireless communications network within the Tylerville section of Haddam (refer to Figure 3). Tylerville is located at the junction of Route 82 and 154 in southeast Haddam. (Applicants 1, pp. 7-8; Council Administrative Notice Item No. 82)
62. Roads and surrounding areas without reliable service include, but are not limited to, Route 154, Route 82, Camp Bethel Road, Old Country Road, Little Meadow Road and Eagle Landing State Park. (Applicants 1, Attachment 6; Council Administrative Notice Item No. 82)
63. Cellco proposes to install antennas at a centerline height of 135 feet above ground level (agl) to operate 700 MHz, 850 MHz, 1900 MHz, 2100 MHz and 3600-3700 MHz frequencies at the site. (Applicants 1, p. 7, Attachment 6; Applicants 4, response 27)
64. Cellco currently operates three facilities within four miles of the proposed site. A fourth facility approved in Council Docket 520 located at 124 Ague Spring Road in Haddam, approximately 4.3 miles from the proposed site, is scheduled to be on-line by the end of 2025. None of these facilities are able to provide adequate coverage to the proposed service area. (Applicants 1, p. 10, Attachment 6; Applicants 4, response 19)
65. The 700 MHz frequency handles most of Cellco's wireless traffic and has the largest coverage footprint. The other frequencies maintain a smaller coverage footprint and provide Cellco customers with additional service capacity as well as increased data speeds. (Applicants 1, Attachment 6; Applicants 4, response 23)
66. Cellco determined a need for this site using Cellco's coverage mapping tool and data speed performance measurements. (Applicants 1, Attachment 6; Applicants 4, response 22)
67. Cellco designs its network using a -95 dB Reference Signal Received Power (RSRP) standard for reliable in-vehicle service and -85 dB RSRP standard for reliable in-building service. Data speeds increase with a stronger signal. (Applicants 1, Attachment 6; Applicants 4, response 24)
68. The proposed site would provide reliable wireless service to the Tylerville area. New, reliable wireless coverage (-85 dB RSRP) from the proposed site is provided in the table below:

Street Name	700 MHz	850 MHz	1900 MHz	2100 MHz	3700 MHz
Route 82	0.5	1.0	0.7	0.5	1.5
Route 154	2.6	2.6	2	1.5	2.5
Road Total	3.1	3.6	2.7	2.0	4.0
Overall Coverage Footprint (Square Miles)	1.0	3.5	2.0	0.7	4.5

(Applicants 4, response 27; Tr. 1, pp 20-21)

69. The proposed site would provide reliable coverage to the commercial, industrial and multi-family residential (Adel Center Senior Housing and Blueway Commons Apartments) areas of Tylerville, as well as outlying residential areas and Eagle Landing State Park along the Connecticut River (refer to Figure 4). (Applicants 1, Attachment 6; Applicants 4, response 25)
70. The site would also improve wireless service in East Haddam village, east of the site, from the -95 dBm threshold to the -85 dBm threshold, including but not limited to, Route 82 bridge, Route 149,

- Lumberyard Road and Ray Hill Road. (Applicants 1, Attachment 6; Council Administrative Notice Item No. 82)
71. Lowering the height of Cello's proposed antennas would result in larger coverage gaps on Route 154 and Route 82, the primary coverage objective of the site. (Applicants 4, response 20)
72. The proposed facility would provide significant capacity relief to Cellco's existing Haddam Facility (700 MHz Alpha Sector), approximately 1.6 miles to the west. (Applicants 1, p. 8, Attachment 6; Applicants 4, response 21)

Site Selection

73. HT initiated a site search in the Haddam area in 2015 and signed a lease with the host parcel owner in 2016. HT continued site search efforts from 2017-2020. Cellco began looking for a site in October of 2021 and its search area was centered 0.3 miles to the north and included surrounding areas with suitable topography. (Applicants 4, responses 4, 5 & 6)
74. There are no existing towers within the site search area that would meet Cellco's coverage objectives due to distances between existing sites and intervening topography. (Applicants 1, p. 10, Attachment 8)
75. Applicants investigated 21 sites within the search area as follows:
- a) **Old Chester Road North, Haddam**, (the proposed site): a 6-acre parcel zoned commercial, selected as the proposed site.
 - b) **Jail Hill Road, Haddam, Parcel ID: 31 051 1**: a Town-owned 27-acre parcel. It would not meet Cellco's coverage objectives due to intervening topography.
 - c) **79 Jail Hill Road, Haddam**: a Town-owned 17-acre parcel. The Town was not interested in a lease.
 - d) **Rutty Ferry Road, Haddam, Parcel ID: 48 037 1**; a Town-owned 0.4-acre parcel. The Town was not interested in a lease.
 - e) **Old Chester Road North, Haddam, Parcel ID: 65 2**; a Town-owned 0.4-acre parcel. The Town was not interested in a lease.
 - f) **Saybrook Road, Haddam, Parcel ID: 50 031**; a 3-acre parcel zoned residential. HT has a lease; however, the site would not meet Cellco's coverage objectives due to intervening topography.
 - g) **Saybrook Road, Haddam, Parcel ID: 48 063**; a 14-acre parcel zoned residential. Landowner was not interested in a lease..
 - h) **Saybrook Road, Haddam, Parcel ID: 50 27A**; a 15-acre parcel zoned residential. Landowner was not interested in a lease.
 - i) **Saybrook Road, Haddam, Parcel ID: 48 057**; a 13.6-acre parcel zoned residential. The site was too close to the CT River would not meet Cellco's coverage objectives.
 - j) **1367 Saybrook Road, Haddam**; a 13.2-acre parcel zoned residential. The site was too close to the CT River would not meet Cellco's coverage objectives.
 - k) **1627 Saybrook Road, Haddam**; a 1.4-acre commercial parcel. Landowner was not interested in a lease.
 - l) **1617 Saybrook Road, Haddam**; a 0.5-acre commercial parcel. Landowner did not respond to mailing.
 - m) **1610 Saybrook Road, Haddam**: a 2.2-acre parcel zoned residential. HT held a lease but it was not renewed due to limited screening.
 - n) **88 Bridge Road, Haddam**; a 3-acre parcel zoned industrial. Landowner did not respond to mailing.

- o) **1586 Saybrook Road, Haddam;** a 3.6-acre parcel zoned industrial. Landowner was not interested in a lease.
 - p) **105 Bridge Road, Haddam;** a 2.4-acre parcel zoned industrial. Landowner did not respond to mailing.
 - q) **5 Bridge Road, Haddam;** a 3-acre parcel zoned industrial. HT held a lease which was not renewed by the Landowner.
 - r) **Rutty Ferry Road, Haddam, Parcel ID: 48 037 2;** a 25-acre parcel zoned commercial. Property is under agreement for sale.
 - s) **47 Haddam View Heights, Haddam;** a 1.6-acre parcel zoned residential. Parcel was not pursued due to proximity to CT River and residences.
 - t) **1384 Saybrook Road, Haddam;** a 21-acre parcel with Eversource structures. Eversource was not responsive in attempts to negotiate a lease.
 - u) **River Road, Haddam, Parcel ID: 48 040;** a 2-acre parcel zoned commercial. Landowner did not respond to mailing.
- (Applicants 1, Attachment 8; Applicants 4, response 7)
76. On June 20, 2024, in Petition No. 1616, the Council approved a 40-foot extension of an existing Connecticut Department of Emergency Services and Public Protection facility at 194 Mount Parnassus Road in East Haddam to accommodate Cellco's collocation and additional tenants. Cellco's equipment installation at the expanded DESPP facility would not provide service to the Tylerville area. It is designed to provide coverage to East Haddam. (Council Administrative notice Item No. 38)
77. The Council has no authority to compel a parcel owner to sell or lease property, or portions thereof, for the purpose of siting a facility nor shall the Council be limited in any way by the applicant having already acquired land or an interest therein for the purpose of constructing a facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007); CGS §16-50p(g)(2025))
78. For any site to be considered a feasible and prudent alternative to a proposed facility site, it must be available to host the proposed facility. The Council has no authority to force a property owner to agree to sell or lease land, or any portion thereof, as a primary or alternative location for a proposed facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))

Small Cells and Distributed Antenna Systems

79. A series of small cells or a Distributed Antenna System (DAS) to serve the area is not cost effective or feasible given the number of facilities required and encumbrances on existing utility poles such as transformers, risers, and streetlights that would limit a carrier's ability to use the pole. While the number of small cells or DAS nodes that would be required to provide comparable service is unknown, it is expected to be a large number given the size of the service area. (Applicants 4, response 9)
80. To provide wireless service to the proposed service area would require a significant number of small cell deployments either on existing utility poles or on new utility poles along roadways or on private parcels throughout the proposed service area and would not be economically viable as a replacement for a single tower site. The estimated cost of each small cell deployment is \$75,000. (Applicants 4, response 7)
81. Small cell limitations include a reduction in the number of frequencies deployed, limited wireless service, existing utility equipment encumbrances and the lack of emergency backup power. (Applicants 4, response 7)

Proposed Site

82. Pursuant to RCSA §16-50j-2a(29), “Site” means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. (RCSA §16-50j-2a(29))
83. The proposed tower site is located on an approximate 6.0-acre undeveloped parcel off Old Chester Road North in the Tylerville section of Haddam (refer to Figure 5), owned by Donald A. and Marianne C. Smith. The abutting parcel to the north at 1583 Saybrook Road, which is a 4.1 acre parcel developed with a vacant commercial building and parking lot also owned by the Smiths, will be used for permanent access to the site. (Applicants 1, p. 16, Attachment 1)
84. The host parcel is zoned commercial (C-1) and is within the Town’s Connecticut River Gateway Conservation zone. (Applicants 1, p. 16)
85. The Connecticut River Gateway Conservation Zone was established to conserve aesthetic and ecological riverway resources in eight towns along the lower Connecticut River. The Town established zoning regulations consistent with the goals of the conservation zone, which is overseen by the Connecticut River Gateway Commission (CRGC). The Applicants notified the CRGC of the proposed facility on January 10, 2025. (Applicants 1, bulk file 4, Attachment 2)
86. The proposed tower site is in the northeast portion of the host parcel. An old road extends through a wooded area on the abutting 1583 Saybrook Road parcel to a relatively level area on the host parcel where the tower would be located. (Applicants 1, Attachment 1)
87. Land use immediately surrounding the site consists primarily of undeveloped woodland to the west and south, commercial use to the east and southeast, and residential use to the north. (Applicants 1, Attachment 1, Attachment 9)
88. The proposed tower site is located at an approximate ground elevation of 114 feet above mean sea level (amsl). (Applicants 1, Attachment 1)
89. The tower site would be within a 43-foot by 100-foot (4,300 square foot) lease area. (Applicants 1, Attachment 1)
90. Development of the site, including the access drive, would disturb less than one acre of land (approximately 0.45 acre). (Applicants 1, Attachment 1)

Proposed Facility

91. The proposed facility would consist of a 140-foot monopole within a 43-foot by 80-foot equipment compound (refer to Figure 6). (Applicants 1, Attachment 1)
92. The tower and foundation would be designed to support a 20-foot increase in height. (Applicants 1, response 40)
93. Cellco would install 9 panel antennas and 6 remote radio heads on an antenna platform at a centerline height of 135 feet agl (refer to Figure 6). (Applicants 1, p. 3, Attachment 1)

94. The compound is designed to accommodate four wireless carriers and Town equipment. (Applicants 1, Attachment 1; Applicants 4, responses 8 & 11; Tr. 1, pp. 18-20, 43-44)
95. Cellco would install one equipment cabinet, one battery cabinet and a 50-kilowatt diesel-fueled emergency backup generator on a 10-foot by 20-foot concrete pad, covered with a steel canopy. (Applicants 1, p. 8, Attachment 1)
96. The proposed equipment compound would be surrounded by an eight-foot high chain link fence that includes a 12-foot wide vehicle access gate. (Applicants 1, Attachment 1)
97. Access to the tower site would be from a new 12-foot wide, 420-foot long gravel drive extending south from an existing parking lot on the 1583 Saybrook Road parcel. (Applicants 1, Attachment 1)
98. The proposed access drive follows an old road that includes an existing concrete pipe culvert to convey stormwater flows along the hillside. No upgrades to the culvert would be required. (Applicants 1, Attachment 1; Tr. 1, pp. 23-24)
99. Power and telecommunications utilities would extend underground from the compound eastward and downhill through a wooded area to an existing utility pole on Old Chester Road. (Applicants 1, Attachment 1; Tr. 1, pp. 26-27)
100. The site does not require water supply or wastewater utilities. There would be no water connection to the site. (Applicants 1, Attachment 1)
101. There are 3 residences within 1,000 feet of the site. (Applicants 1, Attachment 1)
102. The nearest property line from the compound and tower is approximately 86 feet and 42 feet, respectively, to the north at 1583 Saybrook Road, which is also owned by the facility site host parcel owner. (Applicants 1, Attachment 1)
103. The nearest property line from the compound and tower not owned by the facility site host parcel owner is approximately 140 feet and 115 feet, respectively, to the east at Old Chester Road. (Applicants 1, Attachment 1)
104. The nearest residence from the tower is located approximately 651 feet to the north at 1584 Saybrook Road. (Applicants 1, Attachment 1)
105. A geotechnical survey of the site has not been performed. The survey is typically conducted prior to construction to evaluate existing subsurface conditions necessary to design the tower and foundation as part of the Development and Management (D&M) Plan. (Record; Council Administrative Notice Item No. 36)
106. A D&M Plan is a condition of a Council final decision that must be met prior to commencement of construction and constitutes the “nuts and bolts” of a facility approved by the Council. (CGS §16-50p (2025); RCSA §16-50j-75, *et seq.*; *Woodbridge Newton Neighborhood Env’t Trust, et al v. Conn. Siting Council*, 2024 Conn. LEXIS 163 (2024))
107. Construction would require 350 cubic yards of excavation, 150 cubic yards of stone for the access drive and compound, and 75 cubic yards of trench excavation which would be used as backfill. (Applicants 1, Attachment 1)

108. Applicants anticipate the facility would be constructed over a 60 to 90-day period. Cellco would need 2 weeks for radio frequency testing/integration. (Applicants 1, p. 19; Tr. 1, pp. 33-34)
109. Site construction would commence following Council approval of a D&M Plan for the facility. (Applicants 1, p. 20)
110. A copy or notice of the filing of a D&M Plan with the Council, is required to be provided to the service list for comment. (RCSA §16-50j-75(e))
111. The Council has statutory authority to order a D&M Plan and the Council's D&M Plan process has been upheld by the Connecticut Supreme Court. (CGS §16-50p (2025); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014))
112. The estimated cost of the proposed facility is:
- | | |
|--|-------------------------|
| Tower and Foundation | \$155,000 |
| Site Development | \$130,000 |
| Utility Installation | \$ 85,000 |
| Cellco Antennas and radio equipment | \$395,000 |
| Cellco power systems and other equipment | \$ 85,000 |
| <u>Total Estimated Costs</u> | <u>\$850,000</u> |
- (Applicants 1, p. 20)
113. HT would recover construction costs associated with the facility by the revenue generated from leasing space on the facility to wireless service providers. (Applicants 4, response 14)
114. Cellco would recover the costs of its equipment as part of its business operations and services provided. (Applicants 4, response 14)
115. Neither the project, nor any portion thereof, is proposed to be undertaken by state departments, institutions or agencies or to be funded in whole or in part by the state through any grant or contract. HT and Cellco are private entities. (Applicants 4, response 13; CGS §22a-1, *et seq.* (2025))

Public Health and Safety

116. The Wireless Communications and Public Safety Act of 1999 (911 Act) was enacted by Congress to promote and enhance public safety by making 9-1-1 the universal emergency assistance number, by furthering deployment of wireless 9-1-1 capabilities, and by encouraging construction and operation of seamless ubiquitous and reliable networks for wireless services. (Council Administrative Notice Item No. 6 - Wireless Communications and Public Safety Act of 1999)
117. The proposed facility would be in compliance with the requirements of the 911 Act and would provide Enhanced 911 services. (Applicants 1, p. 6)
118. Wireless carriers have voluntarily begun supporting text-to-911 services nationwide in areas where municipal Public Safety Answering Points (PSAP) support text-to-911 technology. Text-to-911 will extend emergency services to those who are deaf, hard of hearing, have a speech disability, or are in situations where a voice call to 911 may be dangerous or impossible. However, even after a carrier upgrades its network, a user's ability to text to 911 is limited by the ability of the local 911 call center to accept a text message. The FCC does not have the authority to regulate 911 call

- centers; therefore, it cannot require them to accept text messages. (Council Administrative Notice Item No. 21 – FCC Text-to-911: Quick Facts & FAQs)
119. Celco’s proposed equipment installation would be capable of supporting text-to-911 service. (Applicants 4, response 35)
120. Pursuant to the Warning, Alert and Response Network Act of 2006, “Wireless Emergency Alerts” (WEA) is a public safety system that allows customers who own enabled mobile devices to receive geographically-targeted, text messages alerting them of imminent threats to safety in their area. WEA complements the existing Emergency Alert System that is implemented by the FCC and FEMA at the federal level through broadcasters and other media service providers, including wireless carriers. (Council Administrative Notice No. 5 – FCC WARN Act)
121. Celco’s proposed equipment would provide WEA services. (Applicants 4, response 36)
122. Pursuant to CGS §16-50p(a)(3)(G), the tower would be constructed in accordance with the current governing standard in the State of Connecticut for tower design in accordance with the currently adopted International Building Code. (Applicants 1, Attachment 1; Applicants 4, responses 15 & 32)
123. The tower would be designed to the Telecommunications Industry Association 222-H Structural Standards for Steel Antenna Towers and Antenna Supporting Structures. The maximum rated serviceable wind velocity for the antennas on the proposed tower is 150 mph. (Applicants 4, responses 15 & 16)
124. The proposed tower would not require notice to the Federal Aviation Administration (FAA) or constitute an obstruction or hazard to air navigation and therefore would not require any obstruction marking or lighting. (Applicants 1, Attachment 17)
125. Security measures at the site would include, but are not limited to, the proposed compound fence, a locked access gate, removable tower pegs, remote monitoring and silent intrusion alarms on the equipment cabinets. (Applicants 4, responses 32 & 33)
126. The tower setback radius* would extend onto the abutting property to the north at 1583 Saybrook Road, which is also owned by the facility site host parcel owner, by 54 feet. HT would design a tower yield point at a height of 86 feet to ensure the tower setback radius remains within the boundaries of the host parcel. *The horizontal distance equal to the tower height that extends radially from the center of the tower. (Applicants 1, Attachment 1; Tr. 1, pp. 31, 52)
127. Operational noise from the facility would comply with DEEP Noise Control Regulations. (Applicants 4, response 38)
128. Construction noise is exempt from the DEEP Noise Control Regulations §22a-69-1.8(g), which includes, but is not limited to, “physical activity at a site necessary or incidental to the erection, placement, demolition, assembling, altering, blasting, cleaning, repairing, installing, or equipping of buildings or other structures, public or private highways, roads, premises, parks, utility lines, or other property.” (RCSA §22a-69-1.8(g) (2025))
129. Timer operated lights would be installed for night maintenance of the cabinets, when necessary. (Applicants 4, response 39)

- 130. The proposed site is not located within the Federal Emergency Management Agency designated 100-year or 500-year flood zone. (Applicants 1, p. 17, Attachment 15)
- 131. The site is not located within a state-designated aquifer protection area or public water supply watershed area. (Applicants 4, response 37)
- 132. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of Cellco's antennas is 5.2 percent of the standard for the General Public/Uncontrolled Maximum Permissible Exposure, as adopted by the FCC, at a horizontal distance of approximately 488 feet from the tower using the proposed antenna configuration. This calculation was based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) using far-field methodology that assumes all channels would be operating simultaneously, which creates the highest possible power density levels. (Applicants 1, p. 15, Attachment 14; Council Administrative Notice Item No. 2 – FCC OET Bulletin No. 65)

Emergency Backup Power

- 133. In response to two significant storm events in 2011, Governor Malloy formed a Two Storm Panel (Panel) that was charged with an objective review and evaluation of Connecticut's approach to the prevention, planning and mitigation of impacts associated with emergencies and natural disasters that can reasonably be anticipated to impact the state. (Final Report of the Two Storm Panel, (Council Administrative Notice Item No. 57)
- 134. Consistent with the findings and recommendations of the Panel, and in accordance with CGS §16-50ll, the Council, in consultation and coordination with DEEP, DESPP and PURA, studied the feasibility of requiring backup power for telecommunications towers and antennas as the reliability of such telecommunications service is considered to be in the public interest and necessary for the public health and safety. (Council Administrative Notice Item No. 35 – Council Docket No. 432)
- 135. Commercial Mobile Radio Service (CMRS) providers are licensed by and are under the jurisdiction and authority of the FCC. At present, no standards for backup power for CMRS providers have been promulgated by the FCC. (Council Administrative Notice Item No. 35 – Council Docket No. 432)
- 136. Cellco would install a 50-kW diesel-fueled emergency backup generator with a built-in 229-gallon double-walled fuel tank with a leak detection alarm. The generator would be capable of providing approximately 50 hours of runtime at full electrical load in the event of an outage. The generator would be remotely exercised for 20 minutes twice a week. (Applicants 1, p. 18; Applicants 4, responses 28 & 30)
- 137. Cellco would utilize a battery backup to provide up to 8 hours of power in the event the diesel-fueled emergency backup generator failed to start. (Applicants 4, response 29)
- 138. According to RCSA §22a-69-1.8, noise created as a result of, or relating to, an emergency, such as an emergency backup generator, is exempt from the DEEP Noise Control Regulations. (RCSA §22a-69-1.8 (2025))

Environmental Effects and Mitigation Measures

Air and Water Quality

139. Operation of the proposed facility would not produce air emissions, excluding operation of the emergency backup generator. (Applicants 1, p. 15)
140. Pursuant to RCSA §22a-174-3b, the generator would be managed to comply with DEEP's "permit by rule" criteria and would comply with air emissions. Therefore, the generator would be exempt from general air permit requirements. (Applicants 1, p. 19; RCSA §22a-174-3b)
141. The Inland Wetlands and Watercourses Act (IWWA), CGS §22a-36, *et seq.*, contains a specific legislative finding that the inland wetlands and watercourses of the state are an indispensable and irreplaceable but fragile natural resource with which the citizens of the state have been endowed, and the preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the state. (CGS §22a-36, *et seq.* (2025))
142. The IWWA grants regulatory agencies with the authority to regulate upland review areas in its discretion if it finds such regulations necessary to protect wetlands or watercourses from activity that will likely affect those areas. (CGS §22a-42a (2025))
143. The IWWA forbids regulatory agencies from issuing a permit for a regulated activity unless it finds on the basis of the record that a feasible and prudent alternative does not exist. (CGS §22a-41 (2025))
144. There are no wetlands on the host parcel. The nearest wetland is approximately 900 feet east of the site, across Route 154. (Applicants 1, Attachment 11)
145. No vernal pools were identified near the site. (Applicants 1, Attachment 11)
146. HT would install appropriate erosion and sedimentation (E&S) controls such as a construction fence and silt socks consistent with the applicable *Connecticut Guidelines for Soil Erosion and Sediment Control* and the *Connecticut Stormwater Quality Manual*. (Applicants 1, Attachment 1)
147. Pursuant to CGS §22a-430b, a DEEP Stormwater Permit is required for any disturbance greater than 1 acre. The construction limit of disturbance for the proposed site is approximately 0.45 acre, therefore the project would not require a DEEP Stormwater Permit. (CGS §22a-430b; DEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. (Applicants 1, Attachment 1; DEEP-WPED-GP-015)

Forests and Parks

148. The nearest state forest is Cockaponet State Forest, approximately 340 feet to the east at its closest point. The nearest state park is Eagle Landing State Park, approximately 0.5 mile west of the site, along the west bank of the Connecticut River. (Applicants 1, Attachment 9; Council Administrative Notice Item No. 85)
149. Construction of the compound area, underground interconnection line and access driveway would require the removal of 15 trees with a diameter 6 inches at breast height. (Applicants 1, Attachment 1)

150. Installing the interconnection line underground within the access road and within 1583 Saybrook Road property parking lot to avoid disturbance of the forested area east of the compound is not feasible as the host parcel owner intends to redevelop the 1583 Saybrook Road property. In addition, Eversource determined the facility interconnection point is at a utility pole directly east of the compound. HT intends to avoid tree clearing as much as possible when installing the underground utility line through the forested area. (Applicants 1, Attachment 1; Tr. 1, pp. 28-29)

Fish and Wildlife

151. The site is not adjacent to DEEP-designated cold-water stream habitat. Development of the site would not affect fish passage. (Council Administrative Notice Item No. 50; Applicants 1, Attachment 11)
152. DEEP Natural Diversity Database (NDDB) maps show approximate locations of state-listed endangered, threatened, and special concern species and are used to find areas of potential conservation concern. (Council Administrative Notice Item No. 79)
153. The proposed facility is not located within a NDDB buffer area. (Applicants 1, Attachment 10; Council Administrative Notice Item No. 79)
154. The site is within the range of the northern long-eared bat (NLEB), a federally-listed and state-listed endangered species. There are no known NLEB hibernacula or known maternity roost trees within 0.25 miles and 150-feet, respectively, of the proposed site. By letter dated January 29, 2025 the U.S. Fish and Wildlife Service (USFWS) determined that the Project would not likely have an adverse effect on the NLEB if a time of year tree clearing restriction from April 15 to September 30 is implemented. (Applicants 4, Exhibit 1)
155. HT would implement the USFWS tree clearing restriction to avoid tree clearing from April 15 to September 30. (Applicants 4, response 42)
156. The proposed facility is not located within an Important Bird Area (IBA), as designated by the National Audubon Society. (Council Administrative Notice Item No. 84)
157. The proposed facility would comply with the USFWS telecommunications tower guidelines for minimizing the potential for impact to bird species. (Council Administrative Notice Item No. 14; Applicants 1, p. 13)
158. Applicants complied with National Environmental Policy Act (NEPA) requirements for telecommunications facilities. (Applicants 1, p. 13)

Agriculture and Soils

159. Agricultural land is an economic resource. The terms “agriculture” and “farming” are defined under CGS §1-1q. Agriculture and farming activities are exempt from certain statutes and regulations, including, but not limited to, provisions related to wetlands and nuisance. (CGS §1-1q (2025); CGS §19a-341(2025)(commonly known as “the Right to Farm Law”); CGS §22a-19 (2025); CGS §22a-40 (2025); CGS §7-131d (2025); *Red Hill Coalition, Inc. v. Town Plan & Zoning Comm’n*, 212 Conn. 727 (1989); *Indian Spring Land Co. v. Inland Wetlands & Watercourse Agency of Greenwich*, 322 Conn. 1 (2016))
160. The host parcel does not contain prime farmland soils. (Applicants 1, p. 15)

- 161. Soils at the site consist of bedrock/ glacial till (loams, silt, sand, cobbles). (Applicants 1, Bulk File 1d; Applicants 2)
- 162. No blasting would be required to construct the site. (Applicants 4, Exhibit 1)

Scenic, Historic and Recreational Values

- 163. By letter dated November 15, 2024, SHPO determined that one property listed on the National Register of Historic Places, and within a half-mile of the site, would not be impacted by the proposed facility. (Applicants 1, Attachment 12)
- 164. The Applicants performed a Phase 1B archeological survey of the site at the request of SHPO and determined there were no deposits of cultural significance. SHPO reviewed the survey, and by letter dated January 17, 2025, determined no additional archaeological investigations were warranted. (Applicants 2)
- 165. The site is within the Connecticut River Gateway zone. The tower would be visible above the tree line from the Route 154/Route 82 commercial corridor. The tower would blend in with the backdrop when viewed from locations further east, towards the Connecticut River. (Applicants 4, response 41; Council Administrative Notice Item No. 88)
- 166. Route 154, a state-designated scenic road is directly east of the site, extending to the north and south. The proposed tower would be visible both seasonally and year-round from a 0.8-mile section of the road northeast and southeast of the site. (Applicants 1, Attachment 9)
- 167. There are no “blue-blazed” hiking trails maintained by the Connecticut Forest and Park Association within two-miles of the site. (Applicants 1, Attachment 9; Council Administrative Notice Item No. 83)
- 168. Trail systems associated with Cockaponset State Forest are to the west of the site. Views of the tower from the trails would be blocked by vegetation and topography. (Applicants 1, Attachment 9; Applicants 4, response 41)
- 169. Pursuant to CGS §16-50p(b), the Council shall examine whether the proposed facility would be located in an area of the state which the Council, in consultation with DEEP and any affected municipalities, finds to be a relatively undisturbed area that possesses scenic quality of local, regional or state-wide significance and the latest facility design options intended to minimize aesthetic and environmental impacts. The Council may deny an application for a certificate if it determines that the proposed facility would substantially affect the scenic quality of its location or surrounding neighborhood and no public safety concerns require that the proposed facility be constructed in such a location. (CGS §16-50p(b) (2025))
- 170. No comments were received from the Town, OPM or DEEP regarding any impacts to scenic quality or resources. (Record)

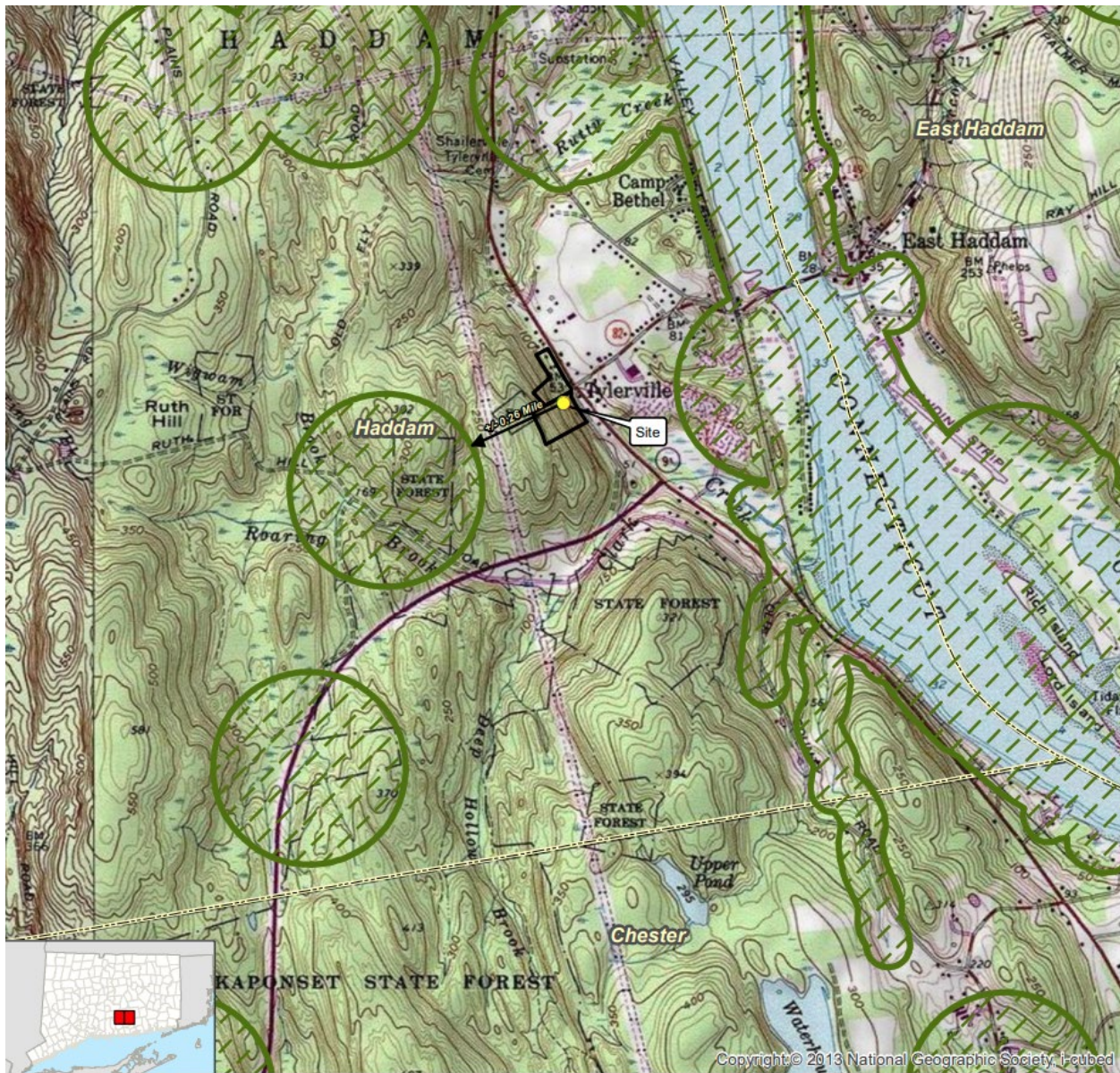
Visibility

- 171. Property owners have no right to an unobstructed view from structures built on adjacent property except where there is an express statutory provision or there is a contract or restrictive covenant protecting the private right to a view or vista. (*Mayer v. Historic District Comm’n of Town of Groton*, 325 Conn. 765 (2017); CGS §47-25 (2025))

172. Applicants used a combination of predictive computer models, in-field analysis, and a review of various data sources to evaluate the visibility of the proposed facility. (Applicants 1, Attachment 9)
173. On November 20, 2024, Applicants conducted a balloon float and field reconnaissance of the proposed tower to assist in the visibility evaluation. The balloon float consisted of flying a four-foot diameter balloon to a height of approximately 140-feet agl. An in-field reconnaissance was then performed from publicly accessible locations in the surrounding area to determine where the balloon was visible. The in-field reconnaissance included photographs taken from various areas around the site. A drone was also used to document views from the Connecticut River. (Applicants 1, Attachment 9; Tr. 1, pp. 39-40)
174. Information obtained during the field reconnaissance was incorporated into a viewshed map that depicts areas with year-round and seasonal visibility within a one-mile radius (8,042 acres) of the site (Study Area) based on computer modeling and in-field observations from local and State roads and other publicly-accessible locations. (Applicants 1, Attachment 9)
175. Trees in the area of the tower range in height from 78 feet to 108 feet tall. (Applicants 4, response 41)
176. Based on the viewshed analysis (refer to Figure 7), the proposed tower would be visible year-round from approximately 243 acres (3%) of the Study Area. Most of this visibility is from the open waters of the Connecticut River and an airfield in East Haddam. Other areas include roadways, fields and open lawn and parking lots within a half-mile of the site. (Applicants 1, Attachment 9)
177. The tower would be seasonally visible (leaf-off conditions) from approximately 242 acres (3%) of the Study Area. Areas within a 0.5 mile of the site with seasonal views generally extend to the northeast and southeast within residential, forested, and commercial areas. (Applicants 1, Attachment 9)
178. Approximately 24 residences within 0.5 miles of the proposed facility may have seasonal views, 16 of which are located either in an apartment complex or an assisted living facility approximately 0.25 miles to the north. Three residences may have year-round views of the facility. (Applicants 1, Attachment 9; Applicants 4, response 41)
179. The tower is set along the east face of a hillside that rises to an elevation of 290 feet amsl allowing the hillside to act as a backdrop when viewed from many locations from the west. (Applicants 1, Attachment 9; Tr. 1, pp. 38-41)
180. Eagle Landing State Park, a 14-acre state park along the west bank of the Connecticut River, is approximately 0.5 miles east of the site. It is noted for its views to the east of the Goodspeed Opera House and the East Haddam Swing Bridge. The tower site is to the west. Views would be screened by distance and topography. (Applicants 1, Attachment 9; Council Administrative Notice Item No. 88; Tr. 1, pp. 37-39)
181. The Applicants would paint the tower brown, which would blend it in with the hillside. The tower would need to be re-painted every five to seven years at a cost of between \$3,000 and \$5,000. (Applicants 1, Attachment 9; Applicants 4, response 17, response 41; Tr. 1, pp. 38-41)
182. The Applicants do not propose to paint the antennas brown because it can negatively affect antenna radio frequency performance. Antenna films can be applied, but the films can degrade, becoming a maintenance issue. (Tr. 1, pp. 40-42)

183. A stealth monopine facility would be more prominent in the proposed location as it would have a larger visual profile within a surrounding deciduous forest. (Applicants 1, Attachment 9; Tr. 1, pp. 50-51)
184. Pursuant to CGS §16-50p(a)(3)(F), for a telecommunications proposed to be installed on land near a building containing a school, the facility will not be less than 250 feet from the building containing the school unless the location is acceptable to the chief elected official of the municipality or the Council finds that the facility will not have a substantial adverse effect on the aesthetics or scenic quality of the neighborhood in which such school is located. (CGS §16-50p(a)(3)(F) (2025))
185. No schools or commercial child day care facilities are located within two miles of the site. The nearest building containing a school or commercial day care is Franklin Academy located at 140 River Road in East Haddam, approximately 2.3-miles southeast of the proposed facility site. (Applicants 1, Attachment 9)

Figure 1 – Site Location – Topographic Map



Legend

- Proposed Monopole
- Subject Property
- CTDEEP Natural Diversity Database (updated June 2024)
- Municipal Boundary

Map Notes:
Base Map Source: USGS 7.5 Minute Topographic
Quadrangle Maps, Deep River, CT (1984) and



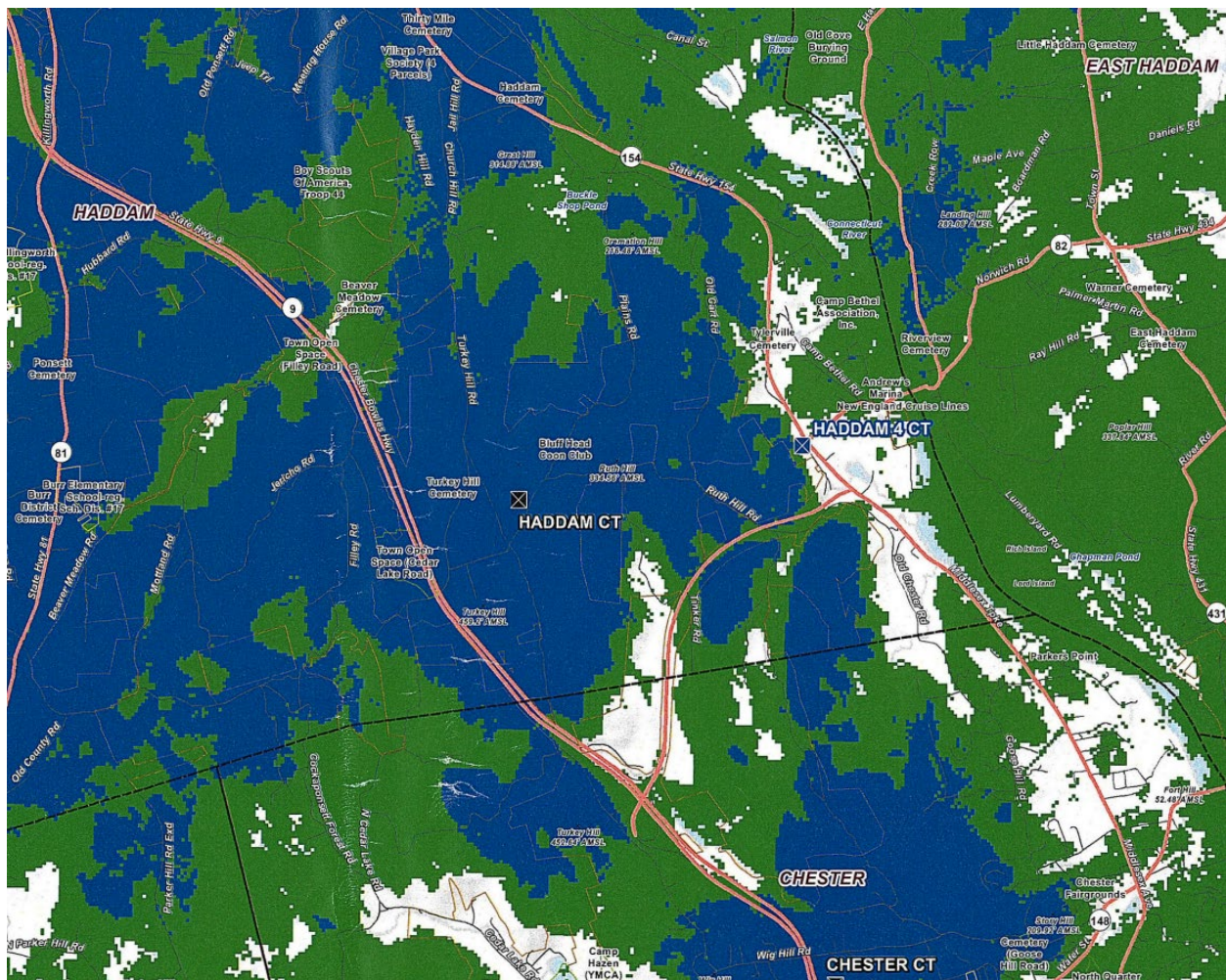
(Applicants 1, Attachment 10)

Figure 2 – Site Location – Aerial Photograph



(Applicants 2)

Figure 3— Cellco Existing 700 MHz Coverage



Legend

-  Proposed Verizon Wireless Facility
-  Existing RSRP ≥ -85 (in building)
-  Existing Verizon Wireless Facilities
-  Existing RSRP ≥ -95 (vehicular)
-  Major Route
-  Town Line

(Applicants 1, Attachment 6)

Figure 4 – Cellco Existing and Proposed 700 MHz Coverage

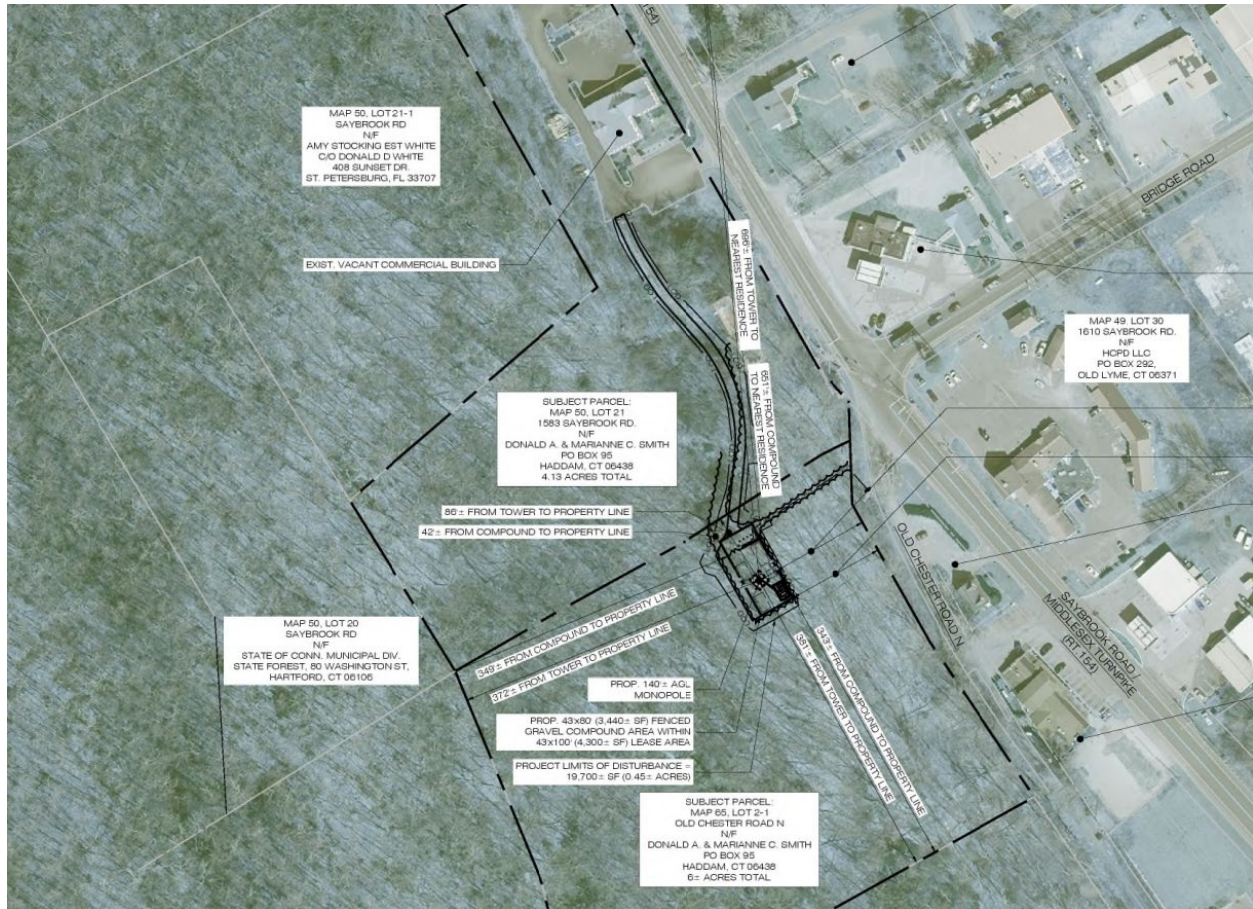


Legend

- Proposed Verizon Wireless Facility
- Existing Verizon Wireless Facilities
- Major Route
- Town Line
- Existing and Proposed RSRP >= -85 (in building)
- Existing and Proposed RSRP >= -95 (vehicular)

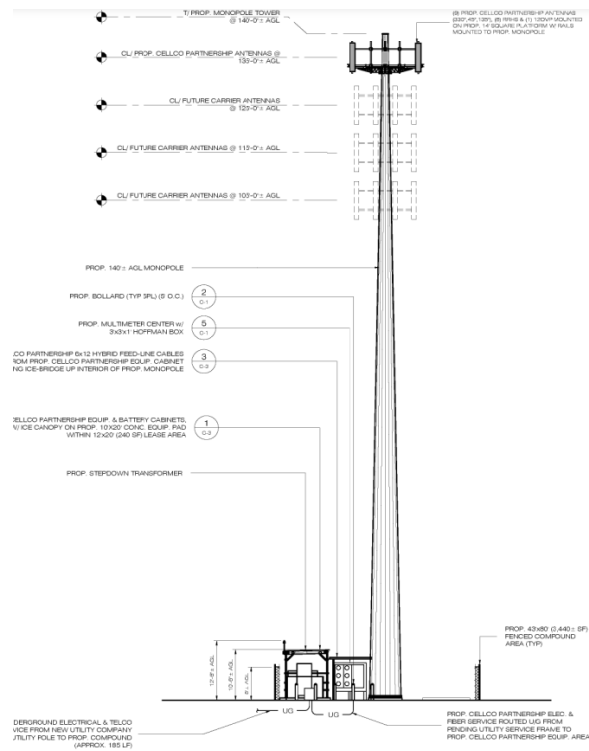
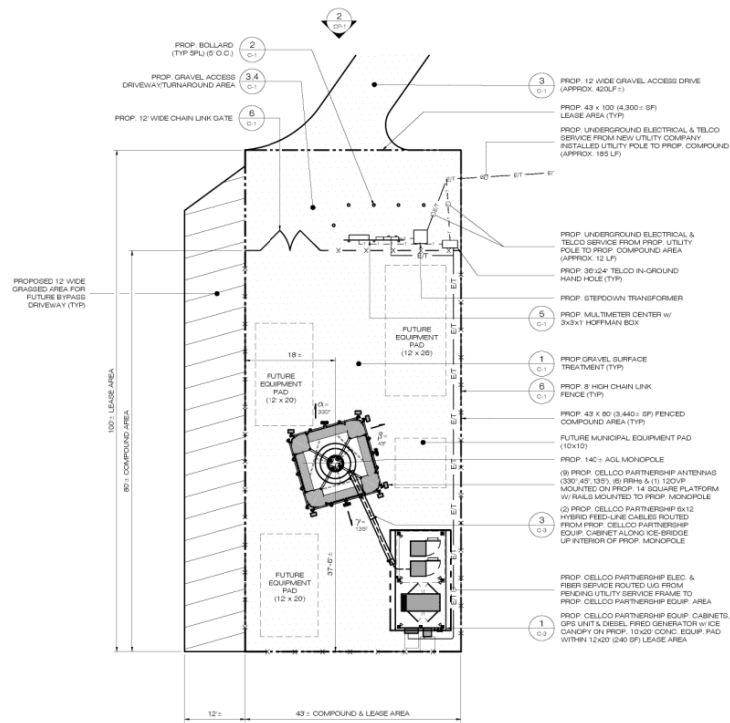
(Applicants 1, Attachment 6)

Figure 5 –Site Plan Overview



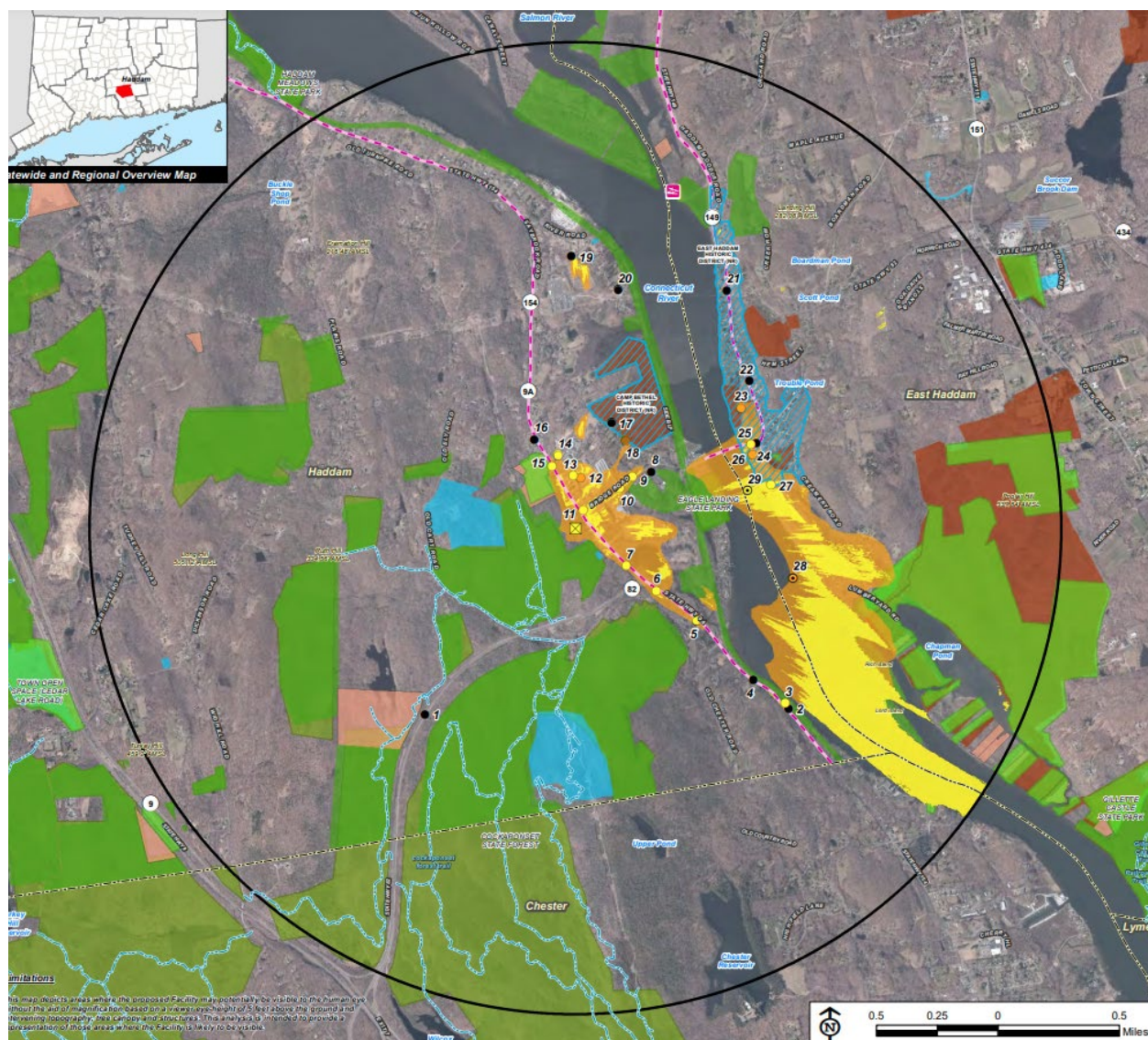
(Applicants 4, Exhibit 2)

Figure 6 – Site Plan detail



(Applicants 1, Attachment 1)

Figure 7 – Proposed Site Visibility Analysis Map



(Applicants 1, Attachment 9)

Visibility Analysis Map Photolog

Photo	Location	Orientation	Distance	Visibility
1	ROUTE 82	NE	+/- 0.98 MILE	NOT VISIBLE
2	SAYBROOK ROAD	NW	+/- 1.15 MILES	NOT VISIBLE
3	SAYBROOK ROAD	NW	+/- 1.13 MILES	YEAR ROUND
4	SAYBROOK ROAD	NW	+/- 0.96 MILE	NOT VISIBLE
5	SAYBROOK ROAD	NW	+/- 0.64 MILE	YEAR ROUND
6	SAYBROOK ROAD	NW	+/- 0.43 MILE	YEAR ROUND
7	SAYBROOK ROAD	NW	+/- 0.26 MILE	YEAR ROUND
8	THE RIVERHOUSE AT GOODSPEED STATION	WSW	+/- 0.39 MILE	NOT VISIBLE
9	BRIDGE ROAD	SW	+/- 0.32 MILE	YEAR ROUND
10	BRIDGE ROAD	SW	+/- 0.25 MILE	YEAR ROUND
11	MOBIL GAS STATION - ADJACENT TO HOST PROPERTY**	SSW	+/- 425 FEET	YEAR ROUND
12	BROOKES COURT	S	+/- 0.21 MILE	SEASONAL
13	BROOKES COURT	S	+/- 0.21 MILE	YEAR ROUND
14	THE ADEL CENTER	SSE	+/- 0.31 MILE	YEAR ROUND
15	THE ADEL CENTER AT SAYBROOK ROAD	SSE	+/- 0.28 MILE	YEAR ROUND
16	SAYBROOK ROAD	SSE	+/- 0.40 MILE	NOT VISIBLE
17	CAMP BETHEL*	SSW	+/- 0.45 MILE	NOT VISIBLE
18	CAMP BETHEL ROAD	SSW	+/- 0.42 MILE	OBSCURED
19	RUTTY FERRY ROAD	S	+/- 1.12 MILES	NOT VISIBLE
20	HADDAM VIEW HEIGHTS	S	+/- 1.00 MILE	NOT VISIBLE
21	MAIN STREET	SSW	+/- 1.16 MILES	NOT VISIBLE
22	MAIN STREET	SW	+/- 0.94 MILE	NOT VISIBLE
23	NATHAN HALE SCHOOLHOUSE MUSEUM	SW	+/- 0.84 MILE	SEASONAL
24	MAIN STREET*	WSW	+/- 0.82 MILE	NOT VISIBLE
25	MAIN STREET	WSW	+/- 0.80 MILE	YEAR ROUND
26	GELSTON HOUSE	WSW	+/- 0.79 MILE	SEASONAL
27	CONNECTICUT RIVER ROAD	WSW	+/- 0.82 MILE	YEAR ROUND
28D	CONNECTICUT RIVER PHOTO TAKEN WITH DRONE +/- 15 FEET ABOVE WATER	WNW	+/- 0.82 MILE	SEASONAL
29D	CONNECTICUT RIVER PHOTO TAKEN WITH DRONE +/- 15 FEET ABOVE WATER	WSW	+/- 0.73 MILE	YEAR ROUND

(Applicants 1, Attachment 9)