

September 30, 2024

Ms. Sandra Hemstreet, Acting Chairperson  
Town of Glen Planning Board  
7 Erie Street  
Fultonville, NY 12072

**Re: Town of Glen  
Proposed Verizon Cell Tower Project Review  
Our Project No. 19503-19**

Dear Ms. Hemstreet,

We are in receipt of the Cellco Partnership Application for Site Plan Approval Letters dated 9/5/2024 and Application for Special Use Permit and Site Plan Review and Statement of Intent dated 9/2/2024. The Application includes the following documents for review: Site Plan Application dated 9/3/2024, Statement of Intent dated 9/4/2024, Full Environmental Assessment Form (FEAF) Part 1 dated 8/29/2024, Redacted Lease with Montgomery County Authorizing Submission of Application for Town Approvals dated 3/25/2024, Documentation of Public Utility Status and Overview of Rosenberg Decision, Overview of Telecommunications Act of 1996, Copy of Verizon Wireless' FCC Licenses for Montgomery County area, Radio Frequency Justification Analysis prepared by John DeCarlo and Site Selection Analysis Prepared by Airosmith Development dated 8/3/2024, Radio Frequency Safety Report, Non-Interference Letter prepared by John DeCarlo dated 9/3/2024, Appendix B State Environmental Quality Review Visual EAF Addendum, FAA Notice Criteria Tool Statement of No Notice Requirement and TOWAIR Report dated 9/3/2024, Tower Design Letter prepared by Tectonic Engineering dated 8/1/2024, Maintenance Letter prepared by Kathy Pomponio dated 8/29/2024, Noise Generation Information on the Emergency Generator dated 8/1/2024, and Site Plans dated 8/29/2024 prepared by Tectonic Engineering Consulting, Geologists & Land Surveyors, D.P.C.

The project involves the installation of a Verizon Wireless antenna array at a centerline height of 175' above ground level on a 180' monopole for a total height of 184' including a 4' lightning rod, at 200 Clark Drive in the Town of Glen, 0.22 miles South for NYS-5S. The project also includes the installation of power and fiber utilities to service the facility. The project is proposed to disturb 0.12 acres out of the 37.79-acre total project site. A review of the aforementioned documents resulted in the following comments:

#### Application

1. All required documents of the Site Plan Submission Checklist have been provided.
2. The Statement of Intent mentions that the proposed construction will occur on a 100 ft x 100 ft portion of land owned by Montgomery County, however, the Overall Site Plan shows a leased area of 75'x75'. The fenced area of 50'x50' on the map agrees with the text in the Statement of Intent.
3. It is stated that the "Applicant agrees to remove all structures if facilities become technically obsolete or cease to be used. Upon removal, the land will be restored to its previous condition (foundation/footing excepted)." and that "it will post with the Town a tower removal bond in the amount to be reasonably set by the Town." We ask the Applicant to provide an estimate for review.

### FEAF

1. The total Current Acreage and Acreage After Project Completion listed in the table in question E.1.b does not equal the stated total acreage of the site. The listed Current Acreage and Acreage After Project Completion both total 35.79 while the stated total acreage of the site in question D.1.b.a is 37.79. We ask the Applicant to revise their appropriate answers to reflect the correct total site acreage, current acreage, and acreage after project completion.
2. The Applicant has indicated in their answer to question E.3.f that the project site, or any portion of it, is not located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory however the EAF Mapper results provided by the Applicant show that the answer to question E.3.f is “yes.” We ask the Applicant review and revise their answer to question E.3.f.

### Engineering Necessity Case – “Auriesville”

1. The data and maps show how the proposed facility will fill in gaps and expand coverage and capacity in the I-90, Route 5, Route 5S and Route 30A corridors, as well as neighboring residential and commercial properties that are currently lacking signal due to topography or foliage. No comments.

### Site Selection Analysis

1. The report details how an area of insufficient coverage or sites that have or will reach data capacity are identified, the analysis of sites to place a new tower with sufficient height and proper location, and the process to select a site where the tower can be placed in conformance with local zoning. No comments.

### SEQR Visual EAF Addendum

1. The Visual EAF Addendum provides additional information regarding the visibility of the proposed project to Question 11 of the FEAF Part 2. The Addendum identifies that the project will be visible between ¼-½ miles from the NY Barge Canal and Interstate 90, and ¼ or less miles from the Canalway Trail, NY-5S, Clark Drive and Riverside Drive. The frequency of visibility will be daily and not seasonal. As the proposed project has a total height of 184 ft the stated visibility responses in the Addendum are consistent. No further comments.

### Structural and Grounding Design Letter

1. The August 1, 2024 letter from Tectonic to Verizon presents the design information for the 184’ tall monopole tower (including 4’ lightning rod) including the design for up to three additional carriers with up to 12 panel antennas each and associated grounding of all equipment. No comments.

### Noise Comparison Letter

1. The August 1, 2024 from Tectonic to Verizon details the noise analysis for the backup generator that is to be installed as part of the project. The generator will perform a routine testing process for 30 minutes every two (2) weeks during daytime hours. The anticipated noise level at the nearest property line (278' away) is approximately 42.4 dBA and the anticipated noise level at the nearest residence (925' away) is approximately 31.9 dBA. These sound levels are well within acceptable levels. No further comment.

### Site Plan

1. The proposed compound has a side setback of 800 ft, 589 ft rear setback, 256 ft side setback, and 737 ft front setback. The proposed cell tower has a side setback of 824 ft, 615 ft rear setback, 278 ft side setback, and 768 ft front setback. The proposed project meets the setback requirements of 50 ft front, 25 ft one/ 50ft both, and 50 ft rear. No further comments.
2. We find the proposed 6 ft fence with 1 ft of 3-strand barbed wire surrounding the 50 ft by 50 ft compound surrounding the cell tower acceptable as it meets the 7 ft height required by the National Electric Code (NEC).
3. The Applicant is proposing a 12ft wide gravel access road with a 15 ft wide parking and turn around area with a 12 ft double gate entrance to the 50ft-by-50ft compound. We find this acceptable for parking and emergency services access to the site. The local fire department should be consulted for comments on the proposed access. The Applicant should advise if a lock box for fence keys will be provided.
4. The proposed cell tower will be at a total height of 184 ft, with the last 4 ft being the lighting rod. Section 5.03 of the Town of Glen Local Land Use Management Local Law states that the height limitations of the ordinance does not apply to radio or television antennae or towers and similar structures, and such features should only be erected to such height as necessary to accomplish the purpose for which they are intended. The Applicant states that 175 ft for the Antenna Center Line (AC) with a top antenna of 180 ft is the minimum height necessary for adequate coverage. Based on a review of the Radio Frequency Justification Analysis, the proposed height at the proposed location is reasonable to provide the intended coverage.
5. The Applicant has sited the proposed cell tower behind an existing tree line to minimize the view of the project to the extent possible.
6. The Applicant has identified on Sheet C-1B a proposed tree line, which appears to be pointing to the wrong line. Please correct the tree line leader and advise if the line that it currently points to is supposed to be silt fence or a proposed grading line for elevation 416.
7. We ask that the Applicant provide any lighting details that are proposed including location, height, intensity and bulk type.
8. We ask that the Applicant provide the location, height, size, materials, and design of all proposed signage.
9. We ask the Applicant to show the proposed construction disturbance limits on the site plan and state the area in acres.
10. A construction entrance detail and details for silt fencing or silt sock should be added to the plan set as well as shown where they should be installed on the site plan.

Town of Glen  
Verizon Wireless Cell Tower Review  
9/30/2024

Please feel free to call or email me with any questions.

Sincerely,



Douglas P. Cole, P.E.  
Senior Director of Engineering

cc: Timothy Reilly, Supervisor  
William J. Mycek, Town Attorney