

LAW OFFICES OF  
**SNYDER & SNYDER, LLP**

94 WHITE PLAINS ROAD

TARRYTOWN, NEW YORK 10591

(914) 333-0700

FAX (914) 333-0743

WRITER'S E-MAIL ADDRESS

e-mail to [RGaudioso@Snyderlaw.net](mailto:RGaudioso@Snyderlaw.net)

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NEW YORK OFFICE  
445 PARK AVENUE, 9TH FLOOR  
NEW YORK, NEW YORK 10022  
(212) 749-1448  
FAX (212) 932-2693

LESLIE J. SNYDER  
ROBERT D. GAUDIOSO (NY/NJ)  
DOUGLAS W. WARDEN  
JORDAN M. FRY (NY/NJ)  
MICHAEL SHERIDAN (NY/NJ)  
DAVID KENNY (NY/NJ)

DAVID L. SNYDER  
(1956-2012)

NEW JERSEY OFFICE  
ONE GATEWAY CENTER, SUITE 2600  
NEWARK, NEW JERSEY 07102  
(973) 824-9772  
FAX (973) 824-9774

REPLY TO:

Tarrytown Office

Honorable Supervisor Lachterman and  
Members of the Town Board  
Town of Yorktown  
363 Underhill Avenue  
Yorktown Heights, NY 10598

RE: Homeland Towers, LLC  
62 Granite Springs Road, Town of Yorktown, NY

Dear Honorable Supervisor Lachterman and Members of the Town Board:

We are the attorneys for Homeland Towers, LLC (“Homeland Towers”) in connection with its proposal to lease a portion of the above captioned property from the Town for a proposed public utility wireless telecommunication facility (“Facility”), including a 130-foot tower and equipment compound designed for the collocation of multiple wireless carriers and Town emergency services entities. Please note that 62 Granite Springs Road is the correct address as provided by the Town to Homeland Towers. This address was included in the public notices and has been included in all of the materials since the address was issued.

At the outset, it is important to recall that Section 300-59(D)(1) of the Town Code expressly requires that “wireless telecommunication facilities shall be located on Town-owned lands or facilities.” Such facilities are subject to Town Board lease approval. Moreover, Section 300-59(C) of the Town Code expressly states that Town Code Section 300-59 does not apply to the proposed Facility as it is on Town-owned property.

In response to the comments made at the public hearing on February 3, 2026, and the Town Board’s expert consultant report from Mr. Fishman (“Fishman Report”), dated January 25, 2026, enclosed please find ten (10) copies of the following documents:

1. Letter from Vincent Xavier, Homeland Towers, dated February 13, 2026, detailing that: (a) the Facility is proposed in the least intrusive and least dense location and in accordance with the Town Code, and will have minimal visibility based on the Viewshed Map, (b) the existing utility poles are not feasible to support small cells based on their height and structural and mounting limitations, (c) six (6) new fifty-foot towers for each of the three carriers (for a total of 18 towers) as contemplated by the CityScape report would be located in the

right-of-way directly in front of homes in dense residential neighborhoods and would not provide reliable service in the area or support public safety equipment, and (d) the CityScape report included polling information evidencing that the residents of Yorktown expect improved wireless services.

2. RF Justification Report, dated February 24, 2026, from VComm, responding to the Fishman Report and including: (a) additional coverage maps and capacity data from Verizon Wireless demonstrating the need for the Facility and the proposed height, (b) a best server map to demonstrate that the Lincoln Hall site covers Somers and the proposed Facility is necessary for Yorktown, and that a site in Somers to the east will be required, (c) detailed information regarding the infeasibility of small wireless facilities as an alternative to the proposed Facility, including the infeasibility of existing utility poles and the use of multiple fifty-foot towers throughout the community.
3. Revised Environmental Assessment Form to include clarifications based on public comments.
4. Letter from EBI, dated February 6, 2026 including the following information: (a) Stuart Farm is not listed or eligible for listing as an historic resource, (b) SHPO has concurred that there will not be any adverse effects on historic or archeological resources; (c) the project is not likely to adversely affect listed endangered or threatened species, (d) there will be no adverse impact on protected or non-protected species, (e) Homeland Towers has agreed to provide that erosion and sediment control measures are utilized and seasonal clearing restrictions are implemented, with tree and drilling disturbance only occurring between October 1 and March 31, and (f) **although no species surveys or additional mitigation measures are required by the USFWS, Homeland Towers is committed to implementing a pre-construction environmental survey and avoidance measures out of an abundance of caution.** The pre-construction survey will be completed by a qualified biologist, and on-site avoidance procedures will be implemented should any sensitive resources be encountered during construction.
5. Signed and sealed letter from Dave Weinpahl, P.E., dated February 3, 2026, confirming the tower design loading and that the tower will be structurally designed to meet all applicable NYS Building Code requirements.
6. Reports from Pinnacle Telecom Group, dated February 2, 2026, and January 9, 2026, responding to the Fishman Report and confirming that the Facility will comply with the applicable FCC regulations for RF exposure. The Pinnacle reports confirm that the FCC exposure guidelines include a safety factor of 50 and apply to either sex, all ages, all sizes and under all conditions. Moreover, the RF calculations were performed in accordance with the required FCC methodology and incorporate numerous conservative values.
7. Letter from Manuel Vicente, President of Homeland Towers, dated January 15, 2026, confirming that the Yorktown VAC and Fire Department currently operate

on two of Homeland Towers' facilities, free of rent (including on private property on Dell Avenue), a savings of approximately \$100,000.00 per year. Moreover, Homeland Towers has spent over \$128,000 purchasing and installing equipment for the VAC and the Fire Department and completed a renovation of the Radio Club's equipment shelter. Here, Homeland Towers has offered free space on the tower and \$25,000 for the purchase of public safety equipment that is needed for reliable service in this area as documented by the Fire Department and VAC in letters to the Town Board.

8. Property Value Report, prepared by Lane Appraisals, dated February 9, 2026, confirming that the Facility will not result in the diminution of property values or reduce the marketability of properties in the immediate area, based on actual paired sales analyses covering nineteen property reports in fifteen separate study areas covering various time periods from 2014 to the present.
9. Letter from KSCJ, dated February 13, 2026, responding to the CAC and public comments, and detailing the changes to the Site Plan.
10. Revised Site Plan.

In summary, the Facility has been sited in accordance with the requirements of the Town Code and in the least intrusive and least dense location furthest from residences. Visibility of the Facility will be minimal as established by the Viewshed Map and visual renderings. The Facility is necessary to provide needed wireless service, not only for Verizon, but also for emergency service providers. The Facility has been designed for emergency services and future collocation to avoid the proliferation of towers. The Facility is necessary to remedy both a coverage and capacity gap in Yorktown and provide the service that the residents of Yorktown expect based on the CityScape poll. Alternative small cell technology will not provide the necessary service and would result in numerous towers located in dense residential neighborhoods bringing the antennas significantly closer to residences.

The Facility will comply with FCC regulations regarding RF exposure by a wide margin of safety. The design of the Facility has been revised to eliminate impact on wetlands. The wetland boundary was confirmed by the NYSDEC and the Town's own wetland expert. The USFWS reviewed the project and raised no objections to the proposed work. The project avoids direct wetland impacts, incorporates erosion and sediment controls to avoid indirect impacts to wetlands, and includes seasonal timing restrictions to further reduce impacts to bog turtles and bats. Homeland Towers has also voluntarily committed to ensure that natural resources, including bog turtles and bats, will be protected during construction. The Facility will be designed and constructed in accordance with all required structural design requirements and the Facility will not create a diminution of property values.

The Facility will not create any significant adverse environmental impacts, and a Negative Declaration should be issued.

We look forward to discussing this matter with the Town Board at the March 3, 2026, continued public hearing. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,  
SNYDER & SNYDER, LLP

By:   
Robert D. Gaudio

Enclosures  
RDG/ldr  
cc: Town Attorney