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October 25, 2022

***VIA FEDERAL EXPRESS AND  
ELECTRONIC MAIL***

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Ms. Melanie A. Bachman, Esq., Executive Director  
Connecticut Siting Council  
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**Re: Docket 511**

Dear Attorney Bachman:

This office represents Barrett Outdoor Communications, Inc. (“Applicant”). On behalf of the Applicant, I have enclosed one original and fifteen hardcopies of its post-hearing brief concerning the above-captioned matter.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

Enclosures

**Updike, Kelly & Spellacy, P.C.**

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**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

APPLICATION FOR A CERTIFICATE	:	DOCKET NO. 511
OF ENVIRONMENTAL COMPATIBILITY	:	
AND PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE	:	
AND OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY	:	
AT 200 EAST MAIN STREET REAR,	:	
STRATFORD, CONNECTICUT	:	October 25, 2022

**POST-HEARING BRIEF OF APPLICANT**

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## **I. INTRODUCTION**

The Applicant, Barrett Outdoor Communications, Inc. (“BOC”), respectfully submits this Post-Hearing Brief in accordance with § 16-50j-31 of the Regulations of Connecticut State Agencies. The cumulative evidence presented in connection with the above-captioned application for a Certificate of Environmental Compatibility and Public Need (“Application”), which incorporated the record in Petition 1467, amply demonstrates that there is a public need for the telecommunications facility proposed at 200 East Main Street, Rear, Stratford, Connecticut (“Facility”), and that the nature of the probable environmental impact of the Facility, which is limited to potential views of parts of the Facility, is not sufficient reason to deny the Application.

## **II. PROCEDURAL MATTERS**

### **A. Petition 1467**

BOC submitted previously a petition for declaratory ruling concerning this site, which was docketed as Petition 1467 by the Connecticut Siting Council (“Council”). The Council and its staff thoroughly vetted the proposed site to determine whether the proposal would have an adverse environmental effect. Based on this thorough review, the staff report did not indicate any adverse environmental impacts and recommended conditions typical of a telecommunications facility. (*Petition 1467 [“Pe”] February 24, 2022, Staff Report.*) The Council ultimately denied Petition 1467 because it concluded that an application for a Certificate was necessary. The Council took administrative notice of the record in Petition 1467 in this Docket. (*Hearing Program, I.B.34.*)

### **B. Application for a Certificate**

On July 22, 2022, BOC filed the Application for the Facility, a 135 foot monopole telecommunications structure to be located at 200 East Main Street, Rear, Stratford, Connecticut (“Property”), with the Council in accordance with General Statutes § 16-50g *et seq.* and § 16-50j-

1 *et seq.* of the Regulations of Connecticut State Agencies. (*Exhibit [“Ex.”]1.*)<sup>1</sup> BOC published notice of its intent to file the Application on two separate occasions in the *Connecticut Post* pursuant to General Statutes § 16-50l(b). (*Ex. 2.*) In accordance with General Statutes § 16-50l(b), BOC sent notices to each person appearing of record as the owner of the Property and of real property abutting the Property. (*Ex. 1, Attach. 3.*) BOC also provided a copy of the Application to all applicable municipal, regional, State and Federal agencies and officials.<sup>2</sup> (*Ex. 1, Attach. 2.*) On September 9, 2022, BOC installed a four-foot by six-foot sign in proximity to the entrance to the Property, which presented information concerning the proposed Facility and the Council’s public hearing. (*Ex. 3.*)

On October 6 2022, pursuant to General Statutes § 16-50m, the Council, after giving due notice thereof, held a public evidentiary hearing, beginning at 2:00p.m. (*October 6, 2022 Hearing Transcript 2:00p.m. [“Tr.”], p. 1.*) Thereafter, the Council continued with the public comment session at 6:30p.m. (*Public Session Tr. 6:30p.m.*)

### **III. PARTIES TO THE PROCEEDINGS**

Barrett is a stock corporation organized under the laws of the State of Connecticut, with a business address of 381 Highland Street, West Haven, Connecticut. Barrett hosts wireless installations on billboard structures and is intimately involved in the design of those wireless installations and maintenance of the underlying structures. (*Ex. 1., pp. 1-2; Pe Interrogatory [“Int.”] Set I Responses [“Set I”], Nos. 9, 11.*) Additionally, the following wireless carriers intervened in the proceedings to present evidence in support of their intent to collocate on the

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<sup>1</sup> All references to the Hearing Exhibits follow the designations in the Hearing Program, dated October 6, 2022.

<sup>2</sup> Barrett also sent an email to each agency and official with a link to the Council’s website specifically concerning Petition 1467. Each agency and official listed in Attachment 2 to the Application also received notice of Petition 1467 contemporaneously with that filing in accordance with § 16-50j-40 of the Regulations of Connecticut State Agencies.

proposed Facility: (1) New Cingular Wireless PCS, LLC's (AT&T); (2) Cellco Partnership *d.b.a.* Verizon Wireless ("Verizon"); and (3) Dish Wireless, LLC ("DISH").

#### **IV. THE PROPOSED FACILITY**

##### **A. The Redevelopment**

The Property is part of an overall redevelopment plan for an area between the Housatonic River and Main Street generally known as the Dock Shopping Center and considered by Stratford as the gateway to the Town. The redevelopment plan includes: (1) development of a multi-story self-storage facility and two standalone restaurants; (2) relocation of the billboard and demolition of the existing telecommunications facility, designated by the Council as a non-tower antenna array ("NTAA"), located at what was once 28 Sidney Street;<sup>3</sup> and (3) significant landscaping along the former Sidney Street. (*Pe Int. Set I, Nos. 3, 8-9, Attach. 2.*) The NTAA is slated for removal in furtherance of the redevelopment plan. The plan includes the development of a Starbucks in the location of the NTAA. (*Tr., p. 16; Pe Int. Set I, Nos. 3, 8-9, Attach. 2.*)

The contemplated removal of the NTAA and location of the proposed Facility at the Property maximizes the commercial use of the UB properties while continuing to recognize the critical nature of wireless communication along the I-95 corridor and surrounding area. It should be noted that implementation of the redevelopment plan is well under way; the multi-story storage facility immediately to the northeast has been constructed. (*Pe Int. Set I, Nos. 3, 8-9, Attach. 2.*)

##### **B. The Proposed Facility**

The Facility is proposed in the northern portion of the Property and would consist of a 4,210 square foot compound and telecommunications easement area. The compound would include an elevated equipment platform consisting of approximately 1,489 square feet, which can

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<sup>3</sup> Stratford discontinued Sidney Street. All of the buildings except the former garage used for telecommunications equipment have been demolished.

be expanded another sixteen feet to accommodate an additional equipment bay. A 135 foot above grade level (“AGL”) monopole, with a lightning rod on top, would host AT&T’s antenna array at a centerline of 132 feet AGL and Verizon’s antenna array at a centerline of 121 feet AGL. (*Ex. 1, Attach. 1, Ex. 4, No. 7.*) DISH would collocate their antenna array at ninety-one feet AGL. (*Tr., p. 12; DISH Ex. 2, p. 2.*) T-Mobile has also expressed an interest to collocate its antenna array at 101 feet AGL. (*Tr., p. 16.*)

The monopole tower design would include a hinge point at approximately fifteen feet from the top of the monopole, or 120 feet AGL. (*Tr., pp. 12, 18-19.*) The location of the hinge point is based upon the edge of the United Illuminating (“UI”) easement boundary. (*Id.*) The Facility would be engineered to accommodate a twenty foot extension, which would include a second hinge point. (*Id.*) Although the flexibility to accommodate future wireless needs makes the availability of an extension prudent design, it is unlikely that an extension would be necessary as four carriers are associated with the proposed Facility. (*Tr., p. 19.*)

Related equipment cabinets would be placed on the elevated equipment platform nearby within the leased area. The compound would be surrounded by an eight foot chain link fence with anti-climb mesh. Access to the proposed tower would be across an existing bituminous drive. A fiber optic cable run would extend underground from East Main Street, with the underground electric service extending from an existing UI transformer. (*Ex. 1, Attach. 1; Tr., pp. 12, 15.*)

### **C. The Property**

The Property is an approximate 4.37 acre parcel located east of East Main Street in Stratford. The Property sits within a Retail Commercial District (CA) and is used as a storage area for boats. The Property is developed with a single metal framed building on an asphalt lot, enclosed with a tall, chain-link fence, with entrances located at the east end of the parcel. The Property is

tucked between the Metro North rail line (“MNRR”) to the north, the Housatonic River to the east, commercial development to the west, and Interstate 95 to the south. (*Ex. 1, p. 4, Attach. 1.*)

The proposed Facility is congruent with Stratford’s Zoning Regulations. (*Pe 1467, Bulk Filing; Petition Narrative [“Pe Nar.”], p. 11.*) The Facility also furthers Stratford’s Plan of Conservation and Development, which acknowledges that wireless providers do not have “complete coverage over the Town.” Plan, ch. 12.2.4, p. 109. (*Id.*)

## **V. MUNICIPAL OUTREACH**

On March 29, 2021, BOC notified the Town of Stratford and the City of Milford of its intent to develop the Facility. BOC submitted a Technical Report concerning Petition 1467, which satisfied the requirements under General Statutes § 16-50l(g)(1). BOC invited Stratford and Milford to hold public information meetings and requested the municipalities to provide BOC with any alternative sites for consideration, including municipal parcels in accordance with General Statutes § 16-50l(g)(2) and (3). (*Pe Bulk Filing; Pe Staff Report.*) Neither municipality chose to conduct a public information meeting, offered any alternative sites for consideration, nor made any suggestions for changes to the proposal. Rather, in the course of BOC’s municipal consultation, both municipalities issued letters of support for the Facility. (*Pe Nar., Attach. 4.*)

BOC would provide space on the Facility for Stratford and Milford’s emergency communications services for no compensation. (*Ex. 1, Attach. 1.*) BOC communicated with the municipalities’ emergency service providers and learned that they are not currently interested in locating its equipment on the Facility. (*Tr., p. 20.*)

## **VI. THERE IS A PUBLIC NEED FOR THE PROPOSED FACILITY**

General Statutes § 16-50p sets forth the criteria the Council must consider in rendering a decision on a proposal such as the Facility. To approve the Application, the Council must find and

determine “a public need for the facility and the basis of the need.” General Statutes § 16-50p(a)(3)(A). The record demonstrates unequivocally that a need exists for the proposed Facility.

*AT&T.* AT&T has a “proven, significant coverage deficiency” in this area of Stratford. (*AT&T Ex. 2, pp. 2-3; AT&T Ex. 3, A4; AT&T Ex. 4, A4.*) To address “AT&T’s significant gaps in coverage” in this area of Stratford, AT&T needs to collocate its antennas on the monopole at 132 feet AGL. (*AT&T Ex. 3, A5; AT&T Ex. 4, A4; Tr., pp. 83-84.*)

*Verizon.* BOC’s submissions in Petition 1467 detailed Verizon’s need for the proposed Facility. The proposed Facility is a replacement for the long-standing Verizon site at the NTAA, dating back to 1996. (*Verizon Ex. 2; Tr., pp. 60-61; Pe Nar., p. 8, Attachs. 3, 15; Pe Int. Set I, Nos. 3, 12-13, 52-54, 56-67, Attachs. 7A-9.*)

*DISH.* DISH has a need to improve its wireless service along Interstate 95. The Facility would also assist DISH in meeting its federal mandate to provide coverage to at least 70 percent of the United States population no later than June 14, 2023. (*DISH Ex.2; Tr., pp. 49-50.*)

## **VII. THE NATURE OF THE PROBABLE ENVIRONMENTAL IMPACT OF THE FACILITY IS NOT SUFFICIENT REASON TO DENY THE APPLICATION**

Section 16-50p also requires the Council to determine whether the “nature of the probable environmental impact of the facility” is “not sufficient reason to deny the [A]pplication.” General Statutes § 16-50p(a)(3)(B) and (C). Section 16-50p(a)(3)(B) requires the Council to consider:

The nature of the probable environmental impact of the facility alone and cumulatively with other existing facilities, including a specification of every significant adverse effect, including, but not limited to, (i) electromagnetic fields that, whether alone or cumulatively with other effects, impact on, and conflict with the policies of the state concerning the natural environment, (ii) ecological balance, (iii) public health and safety, (iv) scenic, historic and recreational values, (v) agriculture, (vi) forests and parks, (vii) air and water purity, and (viii) fish, aquaculture and wildlife . . .

The proposed Facility would not have an adverse impact or otherwise conflict with the policies of the State concerning the natural environment. The record, including Petition 1467, is replete with evidence that the probable environmental impact, which is limited to a relatively small area of potential visibility, is an insufficient reason to deny the Application.

**A. Radio Frequency / Power Density**

The FCC has adopted a standard for exposure to RF emissions from telecommunications facilities. C Squared Systems, LLC performed a maximum density calculation in accordance with the standards set forth in a bulletin published by the FCC, specifically the FCC's Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997). The results of those calculations demonstrate that the proposed Facility would operate within the standards set by the FCC.<sup>4</sup> (*Ex. 1, Attach. 7.*)

**B. Ecological Balance and Natural Resources**

BOC commissioned a thorough environmental assessment of the proposed Facility, performed by All-Points Technology Corporation, P.C. ("APT"), which established that the Facility would not have a significant adverse effect on the natural resources of the State. This comprehensive environmental review is detailed in Petition 1467 and applies to this Application. In addition to the comprehensive environmental reports prepared by APT, the record in Petition 1467 reflects responses to nearly 120 interrogatories issued by the Council, many of which addressed environmental issues. As a result of an exhaustive vetting of the site, the Council's Staff Report did not raise any concerns about the "nature of the probable environmental impact of the facility." (*Pe Staff Report.*)

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<sup>4</sup> If approved, BOC would provide a cumulative power density calculation pursuant to the Council's standard Order.

1. Natural Diversity Database

BOC consulted with the Department of Energy & Environmental Protection (“DEEP”) for a review of the Facility under the DEEP’s Natural Diversity Database. The DEEP issued a determination letter indicating that it does not anticipate negative impacts to State-listed species . . . resulting from your proposed activity at the site . . . .” (*Pe Nar.*, p. 15, *Attach. 9.*)

2. United States Fish and Wildlife Service

A threatened species, the northern long-eared bat (“NLEB”), is known to occur in the vicinity of the proposed Facility. There is no clearing required for the development of the Facility. As confirmed by the United States Fish and Wildlife Service (“USFWS”), the proposed Facility would have no effect on NLEB. (*Pe Nar.*, p. 15, *Attach. 9.*)

3. Avian Assessment

The Facility is not anticipated to impact any migratory bird species. Most notably, the Facility would comply with the USFWS guidelines because the height would be below 199 feet, would not include guy wires and would not require lighting. (*Pe Nar.*, p. 17, *Attach. 14.*)

4. Coastal Resources (Wetlands)

The Property is located within the coastal boundary as defined by General Statutes § 22a-94(b). As part of its comprehensive environmental review, APT conducted a field verification of the locations of coastal resources on or adjacent to the Property. The nearest wetland area or watercourse is a wetland area approximately 316 feet to the east of proposed compound. That wetland resource is identified as a stormwater outfall and riprap armored channel, tidal wetland and intertidal mud flat that borders on the tidally influenced Housatonic River.

APT performed an evaluation of whether the proposed Facility is consistent with the Connecticut Coastal Management Act, codified at General Statutes § 22a-90 *et seq.* The

construction, operation and maintenance of the Facility would not affect water quality or result in a disturbance of or any impact to any wetlands and watercourses, including coastal resources. The proposed Facility would likely not result in an adverse impact to nearby tidal wetlands or other coastal resources associated with the Housatonic River because of the distance from the Facility to the nearest resource area and because of the existing developed and disturbed nature of the Property and surrounding area. (*Pe Nar.*, pp. 11-12, *Attachs. 1, 7.*)

APT's conclusion of no likely adverse impact is reinforced by the design change in the utility connection, which previously would have required work forty feet from the nearest title wetland. Now the nearest disturbance is the eastern end of the proposed Facility compound, which is more than 300 feet west of the nearest title wetland. (*Tr.*, pp. 29-31.)

Additionally, the proposed Facility would not impact any water dependent use. The Facility configuration incorporates an elevated platform, which would enable the wireless providers to locate their backup generators underneath. This design reduces the amount of space to be occupied by the proposed Facility, thus limiting any impact on the use of the Property for boat storage. (*Ex. 1, Attach. 1;* No. 7; *Pe Int. Set I, No. 92; Tr.*, pp. 25, 31-32.)

Lastly, the project area is not located within a 100 year flood zone. (*Ex. 1, Attach. 1; Pe Nar.*, p. 12, *Attachs. 7, 13.*) Although there is no increase in impervious area that would require stormwater analysis; (*Pe Int. Set I, No. 100; Tr.*, p. 39); Barrett would implement Best Management Practices during construction to control storm water and erosion. Additionally, there are no Aquifer Protection Areas in Stratford.<sup>5</sup> (*Pe Nar.*, p. 12.)

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<sup>5</sup> The DEEP does not include any mapping of municipalities without an Aquifer Protection Area. Please see [https://www.ct.gov/deep///cwp/view.asp?q=322248&deepNav\\_GID=1654](https://www.ct.gov/deep///cwp/view.asp?q=322248&deepNav_GID=1654).

## 5. Other Environmental Considerations

BOC evaluated the Facility pursuant to the FCC's regulations implementing the National Environmental Policy Act of 1969 (NEPA). The Property is not designated as a wilderness area and is not located in any areas identified as a wildlife preserve or in a USFW National Wildlife Refuge. There are no National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands located in the vicinity of the Facility. Furthermore, based on field investigations by APT as shown in the survey, the Facility would not have an adverse impact on any federal or state regulated wetlands or watercourses. (*Pe Nar.*, p. 16, *Attach. 12.*) Also, the situs of the Facility is not located within a 100 year or 500 year floodplain. (*Pe Nar.*, p. 17, *Attach. 13.*)

### **C. Public Health and Safety**

The Facility would be a benefit to the public health and safety. The proposed Facility would comply with all applicable safety standards and codes, as amended, relative to the equipment, machinery and technology deployed at the site. (*Pe Int. Set I, Nos. 49-50, 81; AT&T Ex. 2, No. 14; Verizon Ex. 2, No. 18; DISH Ex. , No. 15; Tr., pp 20-21, 41.*)

The proposed Facility would meet all required clearances, including those required by the MNRR, UI and the Connecticut Department of Transportation ("DOT"), as applicable. These clearances include those associated with construction activities as well as permanent structures. BOC consulted with the DOT, MNRR and UI and confirmed that the proposed Facility meets all required clearances. (*Ex. 1, Attach. 1; Ex. 4, Nos. 6-10, Attach. 2; Pe Int. Set I, Nos. 41, 45-46, 82-83, 87; Tr., pp. 17-18, 43.*)

The wireless providers collocating on the Facility would also support text-to-911 service and otherwise comply with all applicable federal E911 requirements. Additionally, the wireless

providers' installation would comply with the Warning, Alert and Response Network Act of 2006. (*AT&T Ex. 2, Nos. 15-17; Verizon Ex. 2, Nos. 19-21; DISH Ex. , Nos. 16-18.*)

BOC would secure the site with an eight foot high chain link fence. The double swing gates would have a lock to prevent unauthorized access. BOC would limit access to its authorized representatives and the wireless carriers leasing space on the monopole. Additionally, the wireless providers would also lock their equipment, with some having alarms to notify their respective operations centers. (*Ex. 1, Attach. 1; Pe Int. Set I, Nos. 81, 90; Tr., pp. 70, 81.*)

BOC designed the proposed Facility to ensure sufficient room for backup generators with integrated diesel tanks for each wireless provider. (*Ex. 1, Attach. 1; Tr., pp. 25-26.*) There may be some additional space that could accommodate a propane tank as a potential backup power source. (*Ex 1, Attach. 1; Tr., p. 42.*) The soil conditions of the Property support the use of backup diesel generators. (*Pe Int. Set I, No, 85.*)

The operation would not adversely impact the public welfare. The Facility would be unmanned, requiring infrequent maintenance visits by each carrier that typically last approximately one hour in duration. (*Pe Nar., p. 16.*) The wireless providers would monitor their equipment at the Facility from remote locations. (*Tr., pp. 70, 81.*)

The Facility would not require a water supply or wastewater utilities. The Facility would not require outdoor storage or solid waste receptacles and the Facility would not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations. Additionally, the proposed Facility would not constitute a hazard to air navigation and otherwise require any additional measures or authorizations from the FAA. (*Ex. 4, No. 11, Attach. 3; Pe Nar., pp. 16, Attach. 11.*)

Lastly, the Facility would not be expected to generate noise beyond the cooling fans within the equipment cabinets. The surrounding area is fully developed with commercial properties that

generate a high volume of traffic. Interstate 95 is immediately to the southeast, and active rail lines run along the northern property boundary. Thus, the ambient noise levels in the area are significant and would qualify as excessive noise under the DEEP Noise Regulations. Any incremental noise from the cooling of wireless providers' equipment would be minor. (*Pe Int. Set I, No. 79.*)

#### **D. Scenic, Historic and Recreational Values**

##### **1. Scenic Values**

The visual impact of the proposed Facility would vary from different locations around the proposed Facility depending on factors such as topography, vegetation and distance from the Facility, as well as the location of structures around the Facility.

The topography and vegetation within a two mile radius of the proposed Facility (“Study Area”) serve to minimize the potential visual impact of the Facility. Only 15.5 percent (1,244 acres) of the Study Area would potentially have year-round views of portions of the proposed Facility. Approximately 94 percent of those views (1,168 acres) would occur over open water and the tidal wetlands associated with the mouth of the Housatonic River. The potential seasonal views of the proposed Facility would include approximately 197 acres. The total potential year-round and seasonal views of the proposed Facility, including those from the water, represent approximately 17.9 percent of the Study Area.

The potential landward year-round views of the proposed Facility would be limited primarily to the commercial areas immediately surrounding the situs of the proposed Facility and along Interstate 95, within 0.5 to 0.75 miles of the Facility. The nearest potential residential year-round views of the proposed Facility are from over 0.25 miles away.

The character of those limited potential views demonstrate that the proposed Facility would not have a substantial adverse environmental effect in the state. The existing conditions include

infrastructure associated with the nearby rail line, raised sections of I-95, electrical transmission structures and large swaths of retail and commercial development.

There are no schools or commercial day care centers within 250 feet of the proposed Facility. The nearest school, Wilcoxson Elementary School, is located approximately 0.52 miles to the northwest of the proposed Facility. The nearest commercial day care center, Mama N’ Cubs Playschool, LLC, is located approximately 0.54 miles to the southeast of the site. Based on APT’s thorough assessment, including a field reconnaissance, APT does not predict that either would have views of the proposed Facility. (*Ex. 1, pp. 6-7; Attach. 6.*)

## 2. Historic Values

On November 19, 2020, the State Historic Preservation Office determined that the proposed Facility “will have no adverse effect to sites listed on or eligible for listing on the National Register of Historic Places” under the following conditions: (1) the antennas, wires, mounts, and associated equipment will be designed and installed to be as non-visible as possible and (2) if not in use for six consecutive months, the equipment shall be removed within ninety days of such consecutive six month period. BOC is amenable to the Council incorporating these conditions into a final decision in the event the Council approves the Facility. (*Pe Nar., pp. 15-16; Attach. 10.*)

## 3. Recreational Values

The proposed Facility would not have a substantial adverse effect on any outdoor recreational facilities or resources. (*Ex. 1, pp. 6-7; Attach. 6.*) The proposed Facility would adhere to the DEEP Long Island Sound Blue Plan. (*Pe Int. Set I, No. 98.*) There would be no views from the Silver Sands State Park and any potential views of the proposed monopole from the Charles E. Wheeler Wildlife Area would be as part of the significant infrastructure in the immediate area of

the proposed Facility. Additionally, boats launching from the nearby marina would see the Facility blended in with the significant existing infrastructure associated with Interstate 95, MNRR and UI.

### **VIII. CONCLUSION**

The record, including Petition 1467, amply supports the finding of a public need, the basis of that need and a finding that the probable environmental impact is not a sufficient reason to deny the Application. The record also demonstrates that the Facility would be instrumental to the public health and safety in that the wireless providers would provide reliable service in the area (or maintain that service in the case of Verizon), including enhanced 911 services. Accordingly, BOC respectfully requests the Council to approve the Application.

Respectfully submitted by,

BARRETT OUTDOOR COMMUNICATIONS,  
INC.

By: \_\_\_\_\_



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**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Docket No. 511 on October 25, 2022:

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