Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS

verizon

WOLCOTT SOUTH
CHESTNUT HILL ROAD
WOLCOTT, CONNECTICUT

DOCKET NO. _____

SEPTEMBER 2, 2020

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EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless ("Cellco") ("Applicant") proposes to construct a wireless telecommunications facility on a 10.17-acre parcel south of Chestnut Hill Road in Wolcott, Connecticut (MBLU 104-1-5B) (the "Property"). The Property is owned by PAL Properties LLC and is undeveloped. The remnants of an old stone structure remain in the northeast corner of the Property. Cellco refers to this cell site as its "Wolcott South Facility". The Wolcott South Facility will provide improved wireless voice and data services in southwest portions of Wolcott and northeast portions of Waterbury, Connecticut.

Cellco proposes to construct a 120-foot tall monopole tower within a 50' x 50' fenced compound (75' x 75' leased area) in the north-central portion of the Property, approximately 650 feet south of Chestnut Hill Road. Cellco would install twelve (12) panel-type antennas and twelve (12) remote radio heads on an antenna-mounting platform at the top of the tower. The top of Cellco's antennas will not extend above the top of the tower. Cellco's radio equipment, a propane-fueled back-up generator and a 500-gallon propane fuel tank would be located on concrete pads within the facility compound. Vehicular access to the Wolcott South Facility would extend from Chestnut Hill Road over a new gravel access driveway to the cell site. Utilities would extend from Chestnut Hill Road, underground along the proposed site access driveway.

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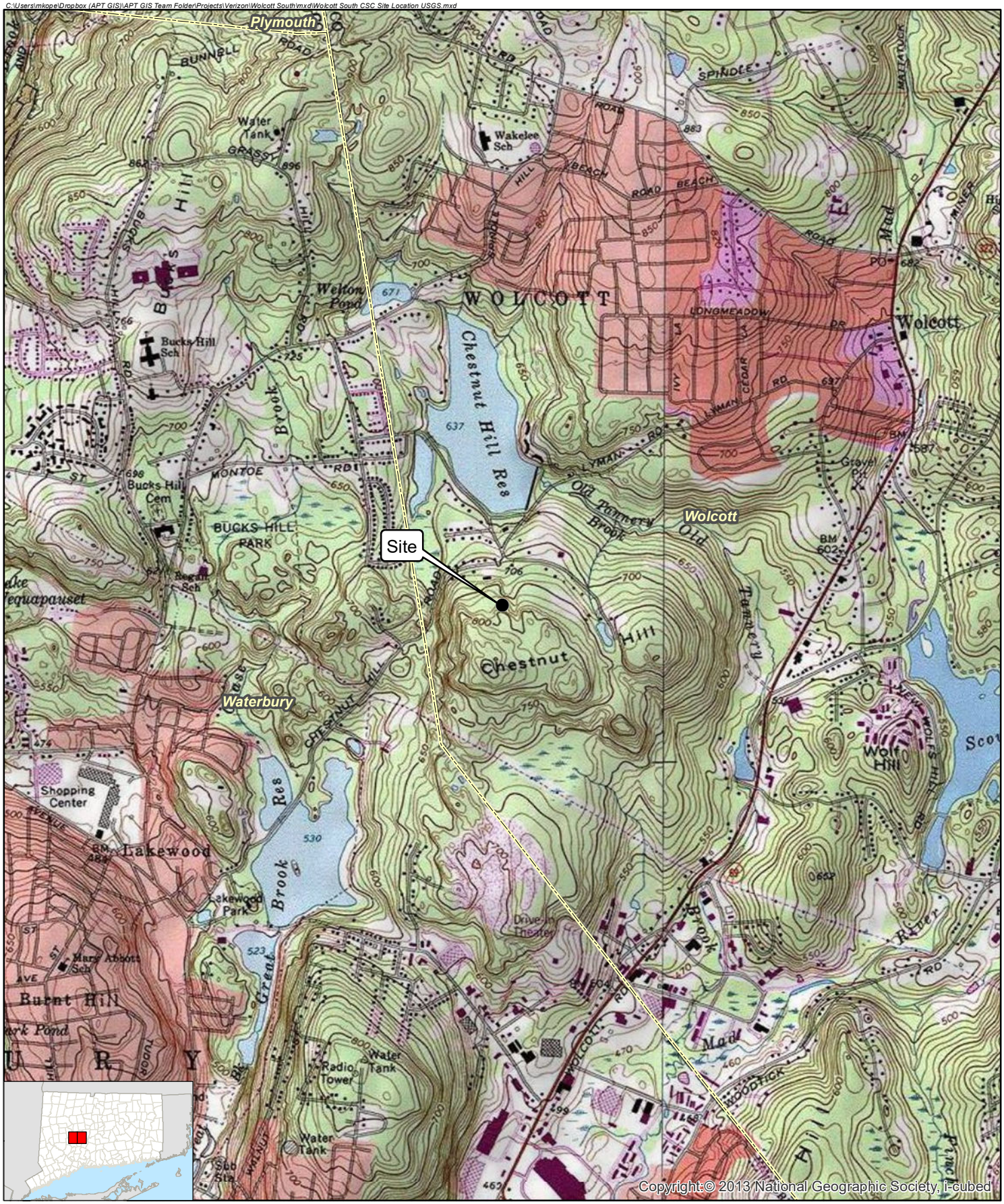

Legend

- Site
- Municipal Boundary

Map Notes:
Base Map Source: USGS 7.5 Minute Topographic Quadrangle Map, Southington, CT (1992) and Waterbury, CT (1984)
Map Scale: 1:24,000
Map Date: September 2019

N W E S

1,000 500 0 1,000 Feet

Site Location Map

Proposed Wireless
Telecommunications Facility
Wolcott South CT
Chestnut Hill Road
Wolcott, Connecticut

verizon

ALL-POINTS TECHNOLOGY CORPORATION

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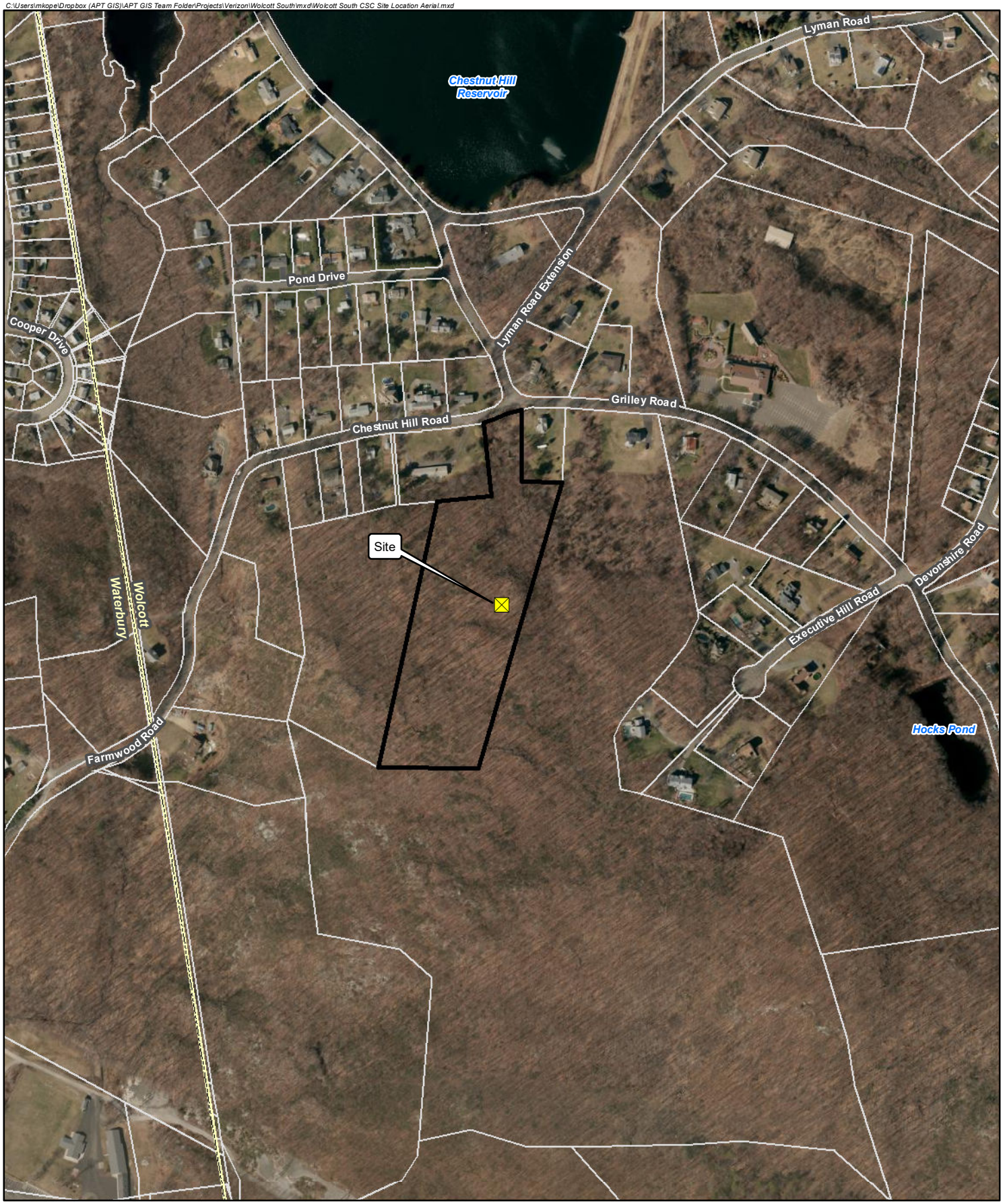

Legend

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

N
W E
S

450 225 0 450 Feet

Site Location Map

Proposed Wireless
Telecommunications Facility
Wolcott South CT
Chestnut Hill Road
Wolcott, Connecticut

verizon

ALL-POINTS TECHNOLOGY CORPORATION

Map Notes:
Base Map Source: 2016 CT ECO Imagery
Map Scale:1 inch = 450 feet
Map Date: September 2019

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT OFF CHESTNUT HILL ROAD, WOLCOTT, CONNECTICUT	:	**DOCKET NO. ____**
	:	**SEPTEMBER 2, 2020**

APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (collectively, the "Application") is submitted by Cellco Partnership d/b/a Verizon Wireless ("Cellco" or the "Applicant"), pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes ("C.G.S."), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies ("R.C.S.A."), as amended. The Application requests that the Connecticut Siting Council ("Council") issue a Certificate of Environmental Compatibility and Public Need ("Certificate") for the construction, maintenance, and operation of a wireless telecommunications facility on a 10.17-acre parcel south of Chestnut Hill Road in Wolcott, Connecticut (MBLU 104-1-5B) (the "Property"). Cellco identifies this cell site as its "Wolcott South Facility". The proposed Wolcott South Facility will consist of a 120-foot monopole tower in the northerly portion of the Property. Cellco would install antennas and remote radio heads on an antenna platform at the top

of the tower. The tower, Cellco's radio equipment and a 25-kilowatt ("kW") propane-fueled generator will be installed within a 50' x 50' fenced compound (75' x 75' leased area).

Included in this Application, as Attachment 1 is a factual summary and project plans for the proposed Wolcott South Facility. This summary, along with the other attachments submitted as part of this Application, contain all of the site-specific information required by statute and the regulations of the Council.

B. The Applicant

Cellco is a Delaware Partnership with an administrative office located at 20 Alexander Drive, Wallingford, CT 06492. Cellco is licensed by the Federal Communications Commission ("FCC") to operate a wireless telecommunications system in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public. Operation of the wireless telecommunications systems and related activities are Cellco's sole business in the State of Connecticut.

Correspondence and/or communications regarding this Application may be addressed to:

Cellco Partnership d/b/a Verizon Wireless
20 Alexander Drive
Wallingford, Connecticut 06492
Attention: Andrew Candiello – Sr. Manager - Real Estate/Regulatory

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP
280 Trumbull Street
Hartford, Connecticut 06103-3597
(860) 275-8200
Attention: Kenneth C. Baldwin, Esq.

C. Application Fee

The estimated total construction cost for the Wolcott South Facility would be less than $5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations of Connecticut State Agencies, an application fee of $1,250 accompanies this Application in the form of a check payable to the Council.

II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50*l*(b)

Copies of this Application have been mailed to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50*l*(b). A certificate of service, along with a list of the officials served with a copy of the Application, is included as Attachment 2.

Notice of Cellco's intent to submit this Application was published on August 27 and August 28, 2020, by Cellco in the *Waterbury Republican-American* pursuant to C.G.S. Section 16-50*l*(b). A copy of the legal notice is included in Attachment 3. A copy of an Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Cellco's intent to file this Application was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50*l*(b), as well as a list of the property owners to whom such notice was sent and a sample notice letter, including attachments.

III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES

The purpose of this section is to provide an overview and general description of the proposed Wolcott South Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the

"Act"). (Pub. L. No. 104-104, 110 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation in all aspects of the telecommunications industry to foster lower prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by states and municipalities, including the Council, with respect to public need for the service to be provided by the facility described in this Application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirement in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco's system throughout its New England and national markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States, Congress also enacted the Wireless Communications and Public

Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004, Congress enacted the Enhanced 911 (E-911) Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued Presidential Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy[1] to 1) ensure that all Americans would have access to broadband capability, whether wired or wireless, 2) establish the United States as a leader in wireless service innovation, and 3) establish, in America, the fastest and most extensive wireless network. In an effort to encourage a more timely review and approval of wireless facility siting applications, the FCC, in 2011, established specific time limits for local and State land use decisions on wireless facilities.[2]

In 2012, Congress passed the Middle-Class Tax Relief and Job Creation Act which included a provision (Section 6409) which mandates the approval of certain eligible wireless facility modifications. The provisions of Section 6409 were further clarified in the FCC's October 17, 2014 Report and Order (FCC-14-153) and again on June 9, 2020 (FCC-20-75) and were specifically designed to accelerate broadband deployment by improving wireless siting policies.

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[1] Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

[2] FCC Declaratory Ruling WT Docket No. 08-165.

Included as Attachment 5 is a copy of the FCC's authorization issued to Cellco for its 700, 850, 1900 and 2100 MHz wireless services in Connecticut. The FCC's rules permit a licensee to modify its system, including the addition of new cell sites, without prior approval by the FCC, as long as the licensee's authorized service area is not enlarged. The Wolcott South Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Wolcott South Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Connecticut, Cellco holds FCC Licenses to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. Cellco will deploy its 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequencies at the Wolcott South Facility. Pursuant to its FCC Licenses, Cellco has developed and continues to develop a network of cell sites to serve the demand for enhanced wireless services throughout the nation and more specifically, the State of Connecticut.

Cellco currently provides wireless service in southwest portions of Wolcott and northeast portions of Waterbury from nine (9) existing macro-cell sites and one (1) small cell facility. These facilities are identified as Cellco's Waterbury 4, Waterbury 5, Waterbury, Wolcott, Waterbury Fulton, Waterbury East, Wolcott North, Thomaston S, Waterbury 3 and Wolcott Center Small Cell (SC) cell sites. Wireless service plots showing the extent of reliable wireless service in the area around the proposed Wolcott South cell site reveal gaps in reliable wireless service and signal level deficiencies along portions of Route 69, to the east and more generally in areas to the north and west of the proposed Wolcott South Facility. In addition, a perhaps more

importantly, Cellco's existing Waterbury cell site (Alpha sector antennas), Wolcott cell site (Gamma sector antennas) and Wolcott North cell site (Beta sector antennas) are currently operating at or near their current capacity limits, resulting in a significant reduction in reliable wireless service in the area. Improvements in the level of reliable service in these areas will occur once the proposed Wolcott South Facility is constructed and activated. Coverage plots showing Cellco's "existing" wireless service in the area around the Property and its wireless service with the proposed Wolcott South Facility are included in Attachment 6.

2. Proposed Cell Site Information

The proposed Wolcott South Facility would be located in the northerly portion of an approximately 10.17-acre parcel south of Chestnut Hill Road near its intersection with Lyman Road. The Property is owned by PAL Properties LLC. The Property is undeveloped. The remnants of an old stone structure remain in the northern portion of the Property, just south of Chestnut Hill Road. At this site, Cellco would construct a 120-foot self-supporting monopole telecommunications tower within a 50' x 50' fenced compound (75' x 75' leased area). Cellco would install a total of six (6) panel-type antennas and six (6) remote radio heads on an antenna mounting platform at the top of the tower. Cellco's antennas will not extend above the top of the tower. Radio equipment associated with Cellco's antennas, a 25-kW propane-fueled generator and a 500-gallon propane fuel tank will be installed on the ground within the fenced compound. Cellco's equipment cabinet would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The back-up battery system and generator will allow the facility to remain operational if commercial power to the facility is interrupted. The equipment would remain unstaffed, except as required for maintenance. Once the cell site is operational,

Cellco technicians will visit the cell site periodically for maintenance purposes. Cellco's back-up generator is exercised once every two (2) weeks for approximately 30 minutes, and always during daytime hours.

Vehicular access to the proposed cell site would extend from Chestnut Hill Road over a new gravel access driveway a distance of approximately 650 feet. Utilities will extend underground along the existing access driveway.

Cellco will deploy its 700 MHz, 850 MHz, 1900 MHz and 2100 MHz wireless services at the Wolcott South Facility. The proposed Wolcott South Facility would provide reliable wireless service to a four mile portion of Route 69; and an overall area of twenty square miles at 700 MHz frequencies; a four mile portion of Route 69; and an overall area of twenty square miles at 850 MHz frequencies; a one mile portion of Route 69; and an overall area of seven square miles at 1900 MHz frequencies; and a one mile portion of Route 69; and an overall area of seven square miles at 2100 MHz frequencies.

Cellco's existing surrounding cell sites that will interact with the proposed Wolcott South include: *Waterbury 4* - antennas on a building rooftop at 150 East Aroura Street in Waterbury located approximately 2.7 miles southwest of the proposed Wolcott South Facility. *Waterbury 5* - antennas on a building rooftop at 835 Wolcott Street in Waterbury located approximately 1.7 miles south of the proposed Wolcott South Facility. *Waterbury* - antennas on a tower off Garden Circle (Farmdale Drive) in Waterbury located approximately 1.5 miles south of the proposed Wolcott South Facility. *Wolcott* - facility consists of antennas on a tower at 347 East Street in Wolcott located approximately 3.8 miles southeast of the proposed Wolcott South Facility. *Waterbury Fulton* - antennas on a rooftop at 330 Bishop Street in Waterbury located

approximately 2.2 miles southwest of the proposed Wolcott South Facility. *Waterbury East* - antennas on the existing tower at 940 Meriden Road in Waterbury located approximately 2.7 miles south of the proposed Wolcott South Facility. *Wolcott North* - antennas on a tower at 1140 Wolcott Road in Wolcott located approximately 2.7 miles northeast of the proposed Wolcott South Facility. *Thomaston South* - antennas on a tower at 170 Mount Tobe Road in Thomaston located approximately 3.7 miles northwest of the proposed Wolcott South Facility. *Waterbury 3* - antennas on a tower at 299 Sheffield Street in Waterbury located approximately 2.2 miles west of the proposed Wolcott South Facility. *Wolcott Center SC* - antennas attached to a utility pole in the public right-of-way near 720 Wolcott Road in Wolcott located approximately 1.4 miles northeast of the proposed Wolcott South Facility.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Wolcott South Facility, in particular, have been designed and developed to allow Cellco to achieve and to maintain high quality, reliable wireless service. The system design is capable of orderly expansion and is compatible with other wireless systems. The resulting quality of service compares favorably with the quality of service provided by conventional wireline telephone service. The wireless system is designed to assure a true cellular configuration of base transmitters and receivers in order to cover the proposed service area effectively while providing the highest quality of service possible.

Mobile telephone switching offices ("MTSOs") in Windsor and Wallingford are interconnected and operate Cellco's wireless systems in Connecticut as a single network, offering the subscriber uninterrupted use of the system while traveling throughout the State. This network is

further interconnected with the local exchange company and long-distance carrier networks.

Cellco has designed its wireless system in conformity with applicable standards and constraints for wireless systems. Cellco's system is also designed to minimize the need for additional cell sites in the absence of additional demand or unforeseen circumstances.

b. Cell Site Equipment

The key elements of the cellular system are the two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller equipment. This equipment is capable of expanding in modules to meet system growth needs. The cell site equipment primarily provides for: message control on the calling channel; call setup and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test commands; data from the mobile or portable unit in both directions and on all channels; scan receiver control; transmission of power control commands; rescanning of all timing; and commands and voice channel assignment.

In addition to the ground-mounted radio equipment, Cellco intends to install twelve (12) panel-type transmit/receive antennas; twelve (12) RRHs; two (2) HYBRIFLEX™ fiber optic antenna cables; and a GPS antenna. Back-up power to the Wolcott South Facility will be provided by a back-up battery system and a 25-kW propane-fueled generator. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

4. Technological Alternatives

Pursuant to authorization by the FCC, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no

equally effective technological alternatives to the proposal contained herein. In fact, Cellco's wireless system represents state-of-the-art technology offering high-quality service. Cellco is aware of no viable and currently available alternatives to its system design for carriers licensed by the FCC.

C. Site Selection and Tower Sharing

1. Cell Site Selection

Cellco's goal in selecting cell sites, like the ones described above, is to locate a facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact. Cellco has determined that the proposed Wolcott South Facility would satisfy this goal and provide high-quality reliable wireless service along portions of Route 69 and local roads, as well as residential, commercial and industrial land uses in the area.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area established by Cellco's Radio Frequency (RF) Engineers and network designers. In any search area, Cellco first examines the use of existing towers or other sufficiently tall structures that might help satisfy its coverage objectives. The existing towers or other non-tower structures considered is described above and included in Attachment 8. Each of these existing facilities are within approximately four (4) miles of the Wolcott South Facility location. These existing sites are identified on the coverage maps included in Attachment 6. The adjacent cell sites cannot, however, satisfy the coverage and capacity objectives for the Wolcott South Facility search area.

Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No such non-tower structures of suitable height

were available in southwest Wolcott. Cellco initiated a site search process for the Wolcott South cell site in March of 2017 and identified the Property as a viable candidate for a cell site. Cellco determined that an antenna centerline height of 116 feet at this location would satisfy its wireless service objectives in the area. The Site Search Summary (Attachment 8) together with the site information contained in Attachment 1 support Cellco's position that the site selected represents the most feasible alternative of the sites investigated.

2. Tower Sharing

The Applicant will design the proposed tower and facility compound to be shared by a minimum of four (4) wireless carriers, the Town, and local emergency service providers, if a need exists. The tower itself could also be designed to be extended up to 20 feet in accordance with past requests from the Council. This type of tower sharing arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future. As of the date of this filing, no other wireless carrier nor the Town of Wolcott has expressed any interest in the Wolcott South Facility.

3. Overall Costs and Benefits

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless service in Wolcott and portions of Waterbury.[3] The Wolcott South

[3] Businesses and individuals across the country have become much more dependent on wireless services especially in emergency situations. The public safety benefits of wireless telephone service are illustrated by the Connecticut State Police Enhanced 911 emergency calling system. The E-911 emergency calling system is available statewide to all wireless telephone users. Numerous other emergency service organizations have turned to wireless telephone service for use during natural disasters and severe storms when wireline service is interrupted or unavailable.

Facility would be a part of a communications system that addresses the public need identified by the FCC and the United States Congress for high-quality, competitive mobile and portable wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in the future. The overall costs to the Applicant for development of the proposed cell site are set forth in Section III.D. of the Application.

4. Environmental Compatibility

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the Council is required to find and to determine, among other things, the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflicting with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

a. Primary Facility Impact is Visual

The wireless system of which the proposed Wolcott South Facility would be a part has been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower site, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a "sight line" toward the tower. Similarly, visual impact of a tower facility can be further reduced through the use of alternative tower structures; so-called "stealth installations" in appropriate circumstances. Attachment 9 contains a Visibility Analysis prepared

by All-Points Technology Corporation ("APT") for the Wolcott South Facility. The Visibility Analysis assesses the visual impact of the tower on the surrounding areas and includes photo simulations for the Council's review and consideration.

According to the Visibility Analysis, due to the rolling terrain in the area around the Property, predicted year-round visibility is limited to three areas. The most prominent views of the tower would be along Chestnut Hill Road to the northeast of the Property. The vast majority of year-round views of the tower are from the Chestnut Hill Reservoir to the north, the closed Waterbury landfill to the south and the area near the Wilby High School complex to the northwest. Together, year-round views of the tower may occur from approximately 60 acres within a two-mile radius of the tower site. Predicted seasonal visibility is estimated to include an additional 44-acres. Together these areas of potential year-round and seasonal visibility amount to less than one percent of the 8,042-acre study area.

There are twenty-seven (27) residences within 1,000 feet of the Wolcott South Facility. The closest residence is located at 90 Chestnut Hill Road approximately 490 feet to the northwest and is owned by Paul and Beverly Devino. The Applicant may be asked to raise a balloon with a diameter of at least three (3) feet at the Wolcott South Facility location on the day of the Council's hearing on this Application, or at a time otherwise specified by the Council.

b. <u>Environmental Reviews and Agency Comments</u>

Section 16-50j of the General Statutes requires the Council to consult with and to solicit comments on the Application from the Commissioners of the Departments of Energy and Environmental Protection, Public Health, Public Utility Regulatory Authority, Economic Development, and Transportation, the Council on Environmental Quality, and the Office of Policy

and Management, Energy Division. In addition to the Council's solicitation of comments, Cellco, as a part of the National Environmental Policy Act ("NEPA") Checklist, solicits comments on the proposed Wolcott South Facility from the U.S. Department of the Interior, Fish and Wildlife Service ("USFWS"), Environmental and Geographic Information Center of the Connecticut Department of Energy Environmental Protection ("DEEP") and the Connecticut Historical Commission, State Historic Preservation Officer ("SHPO").

(1) USFWS & NDDB Reviews

According to the USFWS, Migratory Birds & NDDB Compliance Determination prepared by APT, one federally-listed threatened species is known to occur in the vicinity of the Property, documented as the *Northern Long-Eared Bat* ("NLEB"). For the reasons discussed in the compliance determination, Cellco submits that the proposed Wolcott South Facility will not adversely affect the NLEB.

The proposed Wolcott South Facility would also comply with the USFWS recommended guidelines for reducing impacts to migratory birds. Finally, no known areas of State-listed species are currently depicted on or within 0.25 miles of the most recent DEEP/NDDB maps of the Property. (*See* Attachment 10).

(2) Wetland and Vernal Pool Impact Analysis

As discussed in Section III.C.5.d. below, one wetland area (Wetland 1) was identified on the Property. Wetland 1 is a narrow hill side seep wetland system with a discontinuous and diffuse intermittent watercourse within its limits. The wetland and intermittent watercourse drain to the north. Portions of the northern reaches of the watercourse are channelized. The proposed gravel access driveway will cross Wetland 1 at its narrowest point. The proposed facility compound will

be within 92 feet of a portion of Wetland 1 as it extends off the Property to the southeast.

The wetland crossing has been designed to maintain wetland and watercourse flows and reduce overall impacts to the extent possible. Considering the relatively small area of direct wetland impacts, environmentally sensitive design considerations incorporated into the wetland crossing and wetland protection measures to be implemented during construction, the proposed Wolcott South Facility will not result in a likely adverse impact to the existing wetland resource.

Within the southern portion of Wetland 1, on an adjacent parcel, is a small vernal pool contained within an abandoned well that supports permanent inundation. Construction of the Wolcott South Facility and access driveway will have no direct impact on this vernal pool or its surrounding upland habitat. The proposed Wolcott South Facility development represents a de minimus increase in development of the vernal pool's critical terrestrial habitat ("CTH") and will likely not result in long-term impacts to the CTH. A complete Wetland and Vernal Pool Impact Analysis is included in Attachment 11.

(3) State Historic Preservation Officer

According to a Preliminary Historic Resources Determination prepared by APT for the Wolcott South Facility, there are no historic resources listed on or eligible for listing on the National Register of Historic Places located within one-half mile of the proposed Wolcott South Facility. Further, no state-registered sites are located proximate to the Property. (*See* Attachment 12).

(4) Agriculture

Farmland soils suitable for agricultural use includes land that is defined as prime or farmland of Statewide or local importance, based on soil type. It identifies the location and extent

of the most suitable land for producing food, feed, fiber, forage, and oilseed crops and is available for these uses.[4] According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), there are areas of Prime Farmland soils in the northerly portion of the Property more than 300 feet north of the Wolcott South Facility compound. These farmland soils extend into developed residential areas to north of the Property. (*See* Farmland Soils Map included in Attachment 13).

c. Radio Frequency Emissions

The FCC has adopted standards for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like those proposed in the Application. To ensure compliance with the applicable standards, Cellco has performed a general power density calculation for the proposed Wolcott South Facility according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) ("OET Bulletin 65"). The calculation is a conservative, worst-case approximation for RF emissions at the closest accessible point to the antennas, in this case the base of the tower, and assumes that all antennas are transmitting simultaneously, on all channels, at full power. Even under these absolute worst-case conditions, the calculations indicate that the maximum permissible exposure level for Cellco's antennas at the proposed Wolcott South Facility would remain well below (49.47%) the FCC's Standard. Actual RF emissions levels from the proposed facility would be far below these "worst-case" calculations. A worst-case Cumulative Power Density table is included in Attachment 14.

d. Other Environmental Issues

No sanitary facilities are required for the Wolcott South Facility. The operations at the

[4] Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

Wolcott South Facility will not cause any significant air, water, noise or other environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the Cellco project team, the Applicant submits that the proposed Wolcott South Facility will have no significant adverse effect on scenic, natural, historic or recreational features, and that none of the potential effects alone or cumulatively with other effects is sufficient reason to deny this Application.

5. Consistency with Local Land Use Controls

The Council Application Guide for Community Antenna Television and Telecommunication Facilities, as amended in July 2012, requires the inclusion of a narrative summary of the project's consistency with the Municipality's Plan of Conservation and Development (the "Plan"), Zoning Regulations, and Wetlands Regulations as well as a description of planned and existing uses of the site location and surrounding properties.

a. Planned and Existing Land Uses

The proposed Wolcott South Facility would be located on an approximately 10.17-acre parcel owned by PAL Properties LLC. The Property is zoned Industrial and is currently vacant. The Property is surrounded by undeveloped land to the south and west and residential uses to the east and north along Chestnut Hill Road, Grilley Road and Executive Hill Road.

b. Plan of Conservation and Development

The Town of Wolcott Plan of Conservation & Development dated May 2011 (the "Plan"), does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Wolcott Zoning Map and Geographic Information System (GIS), the Property is located in the Town's Industrial (I) zone district. Wireless telecommunications facilities, involving the development of a new tower site, are permitted in the Industrial zone subject to the approval of a Special Use Permit by the Wolcott Planning and Zoning Commission. The Wolcott Zoning Regulations encourage the use of existing towers and other non-residential structures; new towers in non-residential zones where adequate visual screening is available; and facilities on government or institutional structures in residential zones. Four (4) copies of the Zoning Regulations were filed, in bulk, with the Council.

d. Inland Wetlands and Watercourses Regulations

The Wolcott Inland Wetlands and Watercourses Regulations ("Wetlands Regulations") define Regulated Activity as any operation within or use of a wetland or watercourse or any upland area within 300 feet from a wetland, involving removal or deposition of material, or any obstruction, construction, alteration or pollution, of such wetlands or watercourses. (*See* Section 400-2 of the Wetlands Regulations). Four (4) copies of the Wolcott Wetlands Regulations were filed, in bulk, with the Council. As discussed in more detail above, APT has completed a thorough Wetlands and Vernal Pool Impact Analysis to assess and evaluate potential impacts of the proposed facility. A copy of a Wetlands and Vernal Pool Impact Analysis is included in Attachment 11.

According to the Federal Emergency Management Agency Flood Insurance Rate Map ("FIRM"), Community Panel Number 09009C0109H (Effective December 17, 2010) the Wolcott South Facility would be located in Flood Zone X, an area outside the 500-year flood zone. A

copy of the FIRM is also included in Attachment 15.

6. Local Input

Section 16-50*l*(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On May 8, 2020, Cellco representatives attempted to contact Wolcott Mayor Thomas Dunn by telephone to commence the ninety (90) day municipal consultation process. Due to the closure of Wolcott Town Hall, an in-person meeting with Mayor Dunn was not possible. Mayor Dunn received an electronic copy of technical information summarizing Cellco's plans to establish the Wolcott South Facility on May 8, 2020. Cellco representatives reached out to Mayor Dunn on three (3) other occasions, by telephone and email attempting to solicit comments and or feedback on the tower proposal. Cellco received no response from Mayor Dunn prior to the filing of the Application. Four (4) copies of Cellco's Technical Report were filed in bulk with the Council.

7. Consultations with State and Federal Officials

Attachments 10, 11, 12, 13, 15 and 17 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Wolcott South Facility.

a. Federal Communications Commission

The FCC did not review this tower proposal. As discussed above, FCC approval is not required where the authorized service area is not enlarged.

b. Federal Aviation Administration (FAA)

Cellco completed a Federal Airways & Airspace Analysis, consistent with FAA Regulations Part 77 Sub-Part C Obstruction Analysis Report, for the proposed Wolcott South Facility to determine if the proposed tower would constitute an obstruction or hazard to air navigation. This

analysis has confirmed, pursuant to FAA standards and guidelines, that the proposed tower would not constitute an obstruction or hazard to air navigation. Therefore, no obstruction marking, or lighting would be required. A copy of the Federal Airways & Airspace Analysis report is included in Attachment 16.

c. United States Fish and Wildlife Service

See Section III.C.4.b.(1) above.

d. Connecticut Department of Energy and Environmental Protection

(1) Natural Diversity Data Base

See Section III.C.4.b.(1) above.

(2) Bureau of Air Management

Under normal operating conditions, Cellco's equipment at the Wolcott South Facility would generate no air emissions. During the loss of commercial power and periodically for maintenance purposes, Cellco would utilize a propane-fueled generator to provide emergency back-up power to the proposed cell site. Cellco's back-up generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b.

e. Connecticut State Historic Preservation Officer

See Section III.C.4.b.(3) above.

D. Estimated Cost and Schedule

1. Overall Estimated Costs

The total estimated cost of construction for the Wolcott South Facility is approximately

$565,000. This estimate includes:

(1) Cell site radio equipment $150,000

(2) Tower 50,000

(3) Generator 25,000

(4) Miscellaneous (e.g. site preparation, access, grading, utilities) 340,000

2. Overall Scheduling

Site preparation and engineering would commence following Council approval of Cellco's Development and Maintenance ("D&M") Plan and are expected to be completed within two to four weeks. Equipment installation is expected to take an additional four weeks after installation of the building and installation of the tower. Cell site integration and system testing is expected to require two weeks after equipment installation.

IV. CONCLUSION

Based on the facts contained in this Application, Cellco submits that the establishment of the Wolcott South Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town of Wolcott as determined by the FCC and the United States Congress, and a competitive framework for providing such service has been established by the FCC and the Telecommunications Act of 1996. Cellco submits that the need far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, Cellco respectfully requests that the Council grant this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Wolcott South Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

By: _____

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