

**MESSAGE CENTER MANAGEMENT, INC. (MCM)
NEW CINGULAR WIRELESS PCS, LLC (AT&T)**

**Application to the
State of Connecticut Siting Council**

**For a Certificate of
Environmental Compatibility and Public Need**

—REDDING RIDGE FACILITY—

Docket No. _____

**MESSAGE CENTER MANAGEMENT, INC.
40 WOODLAND STREET
HARTFORD, CT 06105**

**NEW CINGULAR WIRELESS PCS, LLC (AT&T)
500 ENTERPRISE DRIVE
ROCKY HILL, CT 06067**

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¹ A Copy of the Technical Report sent to Redding on December 31, 2013 is included in the Bulk Filing.

**APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

I. Introduction

A. Purpose and Authority

Pursuant to Chapter 277a, § 16-50g et seq. of the Connecticut General Statutes (C.G.S.), as amended, and § 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (R.C.S.A.), as amended, Message Center Management, Inc. (“MCM”) and New Cingular Wireless PCS, LLC (“AT&T”) (together the “Applicants”), hereby submit an application and supporting documentation (collectively, the “Application”) for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications tower facility (the “Facility”) replacing an existing lattice tower. The Facility is proposed at property owned by Redding Ridge Fire District No. 1 which currently hosts an existing fire house and communications tower. The removal of the existing tower and construction of a new replacement tower and compound as proposed for this Facility will permit AT&T, an FCC licensed wireless carrier, to provide services in the vicinity of Blackrock Turnpike and other local roads, schools, and homes in the surrounding Redding Ridge area.

B. Executive Summary

The Facility is proposed to be located on property owned by Redding Ridge Fire District 1. MCM proposes to construct a wireless telecommunications tower facility on a 0.62 acre parcel of land owned by Redding Ridge Fire District 1 and located at 186 Black Rock Turnpike, Redding Connecticut (the "Parcel"). MCM has entered into a long term ground lease with the Redding Ridge Fire District 1. The anchor tenant on this project is New Cingular Wireless PCS, LLC ("AT&T") which has entered into a long term lease with MCM for use of the proposed tower facility. The tower component is a proposed 150' monopole which would replace the existing 80' tall lattice tower currently used by the volunteer fire department. In 1999 the Town of Redding reviewed and approved the shared use of the tower by Nextel. In Docket 334 the Siting Council approved Sprint's application for a replacement 120' monopole with associated equipment compound. That approved facility was never built and the Certificate granted in that proceeding subsequently expired. This tower facility is proposed to allow AT&T, fire department as well as other FCC licensed wireless carriers to provide reliable wireless services in the area of the Town. AT&T has determined that a new facility is required to provide reliable wireless services to the eastern area of Redding and an investigation of the existing site indicates that a replacement tower at the existing tower location is a viable technical alternative. In addition, it is MCM's understanding

that Cellco Partnership d/b/a Verizon Wireless intends to co-locate at this Facility in the near future and as such Verizon's antennas and equipment have been depicted on the drawings included in Attachment 3; though a final lease with Verizon is still pending.

AT&T would install up to twelve (12) panel antennas at a centerline height of 150' AGL along with additional equipment on the tower. An associated 2,256 s.f. equipment compound would accommodate a shelter at the tower base on a concrete pad together with hookups for a back-up power generator. The compound will include equipment space for other carriers and will be enclosed by an eight (8) foot tall chain link fence. Vehicle access to the Facility would be over the existing bituminous parking/driveway area to the tower compound. Utility connections would be run underground from a proposed new utility pole to the south of the Facility compound. A vast majority of the Facility development area has been previously disturbed as part of the operations of Redding Ridge Fire District 1.

C. The Applicants

Applicant Message Center Management, Inc. ("MCM") is a Connecticut corporation with offices at 40 Woodland Street, Hartford, Connecticut. MCM owns and/or operates numerous facilities in the state of Connecticut. MCM is a lessee pursuant to an agreement with Redding Ridge Fire District No. 1.

MCM will construct, maintain and own the proposed Facility and would be the Certificate holder.

Applicant New Cingular Wireless PCS, LLC (“AT&T”) is a Delaware limited liability company with an office at 500 Enterprise Drive, Rocky Hill, Connecticut 06067. The company’s member corporation is licensed by the Federal Communications Commission (“FCC”) to construct and operate a personal wireless services system, which has been interpreted as a “cellular system”, within the meaning of CGS Section 16-50i(a)(6). The company does not conduct any other business in the State of Connecticut other than the provision of personal wireless services under FCC rules and regulations.

Correspondence and/or communications regarding this Application shall be addressed to the attorneys for the Applicants:

Cuddy & Feder, LLP

445 Hamilton Avenue, 14th Floor

White Plains, New York 10601

Attention: Daniel M. Laub, Esq.

Christopher B. Fisher, Esq.

A copy of all correspondence shall also be sent to:

Message Center Management, Inc.

40 Woodland Street

Hartford, Connecticut 06105

Attention: Virginia King

AT&T

500 Enterprise Drive

Rocky Hill, Connecticut

Attention: Michele Briggs

D. Application Fee

Pursuant to R.C.S.A. § 16-50v-1a (b), a check made payable to the Siting Council in the amount of \$1,250 accompanies this Application. Included in this Application and its accompanying attachments are reports, plans and visual materials detailing the design and location for the proposed Facility and the environmental effects, if any, associated therewith. A copy of the Siting Council's Community Antennas Television and Telecommunication Facilities Application Guide with page references from this Application is also included in Attachment 8.

E. Compliance with C.G.S. §16-50/ (c)

Neither of the Applicants is engaged in generating electric power in the State of Connecticut. Therefore, the Facility is not subject to C.G.S. § 16-50r.

Furthermore, the proposed Facility has not been identified in any annual forecast reports. Accordingly, the proposed Facility is not subject to § 16-50/ (c).

II. Service and Notice Required by C.G.S. § 16-50/ (b)

Pursuant to C.G.S. § 16-50/ (b), copies of this Application have been sent by certified mail, return receipt requested, to municipal, regional, state, and federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is included in Attachment 7. Pursuant to C.G.S. § 16-50/ (b), notice of the Applicant's intent to submit this application was published on two occasions in The Redding Pilot, a paper of wide circulation in the area. The text of the published legal notice and publisher's affidavits of publication are included in Attachment 7. Furthermore, in compliance with C.G.S. § 16-50/ (b), notices were sent to each person or entity appearing of record as the owner of a property which abuts the premises on which the Facility is proposed. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are also included in Attachment 7.

III. Statements of Need and Benefits

A. Statement of Need

1. United States Policy & Law

United States policy and laws continue to support the growth of wireless networks. In 1996, Congress recognized the important public need for high quality wireless communications service throughout the United States in part through adoption of the Telecommunications Act (the “Act”). A core purpose of the Act was to “provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans.” H.R. Rep. No. 104-458, at 206 (1996) (Conf. Rep.). With respect to wireless communications services, the Act expressly preserved state and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of such authority, and preempted state or local regulatory oversight in the area of emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In essence, Congress struck a balance between legitimate areas of state and/or local regulatory control over wireless infrastructure and the public’s interest in its timely deployment to meet the public need for wireless services.

Eighteen years later, it remains clear that the current White House administration, Congress and the FCC continue to take a strong stance and act in favor of the provision of wireless service to all Americans. In December 2009, President Obama issued Proclamation 8460, which included wireless

facilities within his definition of the nation's critical infrastructure and declared in part:

Critical infrastructure protection is an essential element of a resilient and secure nation. Critical infrastructure are the assets, systems, and networks, whether physical or virtual, so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety. From water systems to computer networks, power grids to cellular phone towers, risks to critical infrastructure can result from a complex combination of threats and hazards, including terrorist attacks, accidents, and natural disasters.²

President Obama further identified the critical role of robust mobile broadband networks in his 2011 State of the Union address.³ In 2009, The Congress directed the FCC to develop a national broadband plan to ensure that every American would have access to "broadband capability" whether by wire or wireless. What resulted in 2010 is a document entitled "Connecting America:

² Presidential Proclamation No. 8460, 74 C.F.R. 234 (2009).

³ Cong. Rec. H459 (Jan. 25, 2011), also *available at* <http://www.whitehouse.gov/the-press-office/2011/01/25/remarks-president-state-union-address>. Specifically the President stressed that in order "[t]o attract new businesses to our shores, we need the fastest, most reliable ways to move people, goods, and information—from high-speed rail to high-speed Internet."

The National Broadband Plan” (the “Plan”).⁴ Although broad in scope, the Plan’s goal is undeniably clear:

[A]dvance consumer welfare, civic participation, public safety and homeland security, community development, health care delivery, energy independence and efficiency, education, employee training, private sector investment, entrepreneurial activity, job creation and economic growth, and other national purposes.⁵ [internal quotes omitted]

The Plan notes that wireless broadband access is growing rapidly with “the emergence of broad new classes of connected devices and the rollout of fourth-generation (4G) wireless technologies such as Long Term Evolution (LTE) and WiMAX.”⁶ A specific goal of the Plan is that “[t]he United States should lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation.”⁷

In April 2011, the FCC issued a Notice of Inquiry concerning the best practices available to achieve wide-reaching broadband capabilities across the nation including better wireless access for the public.⁸ The public need for timely

⁴ Connecting America: The National Broadband Plan, Federal Communications Commission (2010), *available at* <http://www.broadband.gov/plan/>.

⁵ *Id.* at XI.

⁶ *Id.* at 76.

⁷ *Id.* at 25.

⁸ FCC 11-51: Notice of Inquiry, In the Matter of Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless

deployment of wireless infrastructure is further supported by the FCC's Declaratory Ruling interpreting § 332(c)(7)(B) of the Telecommunications Act and establishing specific time limits for decisions on land use and zoning permit applications.⁹ More recently, the critical importance of timely deployment of wireless infrastructure to American safety and economy was confirmed in the Middle Class Tax Relief and Job Creation Act of 2012, which included a provision, Section 6409, that preempts a discretionary review process for eligible modifications of existing wireless towers or base stations.¹⁰

2. United States Wireless Usage Statistics

Over the past thirty years, wireless communications have revolutionized the way Americans live, work and play.¹¹ The ability to connect with one another in a mobile environment has proven essential to the public's health, safety and welfare. As of June 2012, there were an estimated 321.7 million wireless subscribers in the United States.¹² Wireless network data traffic was reported at 341.2 billion megabytes, which represents a 111% increase from the prior

Facilities Siting, available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0407/FCC-11-51A1.pdf.

⁹ WT Docket No. 08-165- Declaratory Ruling on Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance ("Declaratory Ruling").

¹⁰ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §6409 (2012), available at <http://gpo.gov/fdsys/pkg/BILLS-112hr3630enr/pdf/BILLS-112hr3630enr.pdf>; see also H.R. Rep. No. 112-399 at 132-33 (2012)(Conf. Rep.), available at <http://www.gpo.gov/fdsys/pkg/CRPT-112hrpt399/pdf/CRPT-112hrt399.pdf>.

¹¹ See, generally, History of Wireless Communications, *available at* http://www.ctia.org/media/industry_info/index.cfm/AID/10388 (2011)

¹² CTIA's Wireless Industry Indices: Semi-Annual Data Survey Results, A Comprehensive Report from CTIA Analyzing the U.S. Wireless Industry, Mid-Year 2012 Results (Semi-Annual Data Survey Results). See also, "CTIA-The Wireless Association Semi-Annual Survey Reveals Historical Wireless Trend" *available at* <http://www.ctia.org/media/press/body.cfm/prid/2133>.

year.¹³ Other statistics provide an important sociological understanding of how critical access to wireless services has become. In 2005, 8.4% of households in the United States had cut the cord and were wireless only.¹⁴ By 2012, that number grew exponentially to an astonishing 38.2% of all households.¹⁵ Connecticut in contrast lags behind in this statistic with 20.6% wireless only households.¹⁶

Wireless access has also provided individuals a newfound form of safety. Today, approximately 70% of *all* 9-1-1 calls made each year come from a wireless device.¹⁷ Beginning May 15, 2014, wireless carriers in the U.S. will voluntarily support Text-to-911, a program that allows users to send text messages to emergency services as an alternative to placing a phone call. AT&T and other licensed FCC wireless carriers will support texting 911.¹⁸

¹³ Id.

¹⁴ CTIA Wireless Quick Facts, available at <http://www.ctia.org/your-wireless-life/how-wireless-works/wireless-quick-facts> citing *Early Release of Estimates from the National Health Interview Survey, December 2012*, National Center for Health Statistics, June 2013.

¹⁵ Id.

¹⁶ *Early Release of Estimates from the National Health Interview Survey, December 2012*, National Center for Health Statistics, June 2013. See also “Wireless Substitution: State-level Estimates From the National Health Interview Survey, 2012”, National Health Statistics Report, No. 70, December 18, 2013.

¹⁷ Wireless 911 Services, FCC, available at <http://www.fcc.gov/guides/wireless-911-services>

¹⁸ See *Text-to-911: What you need to know (FAQ)* available at <http://www.cnet.com/news/text-to-911-what-you-need-to-know-faq>. It should be noted that while the carriers have committed to supporting 911 texting in their service areas, text-to-911 will not be available everywhere. Emergency call centers, called PSAPs (Public Safety Answering Points), are the bodies in charge of implementing text messaging in their areas. These PSAPs are under the jurisdiction of their local states and counties, not the FCC, which governs the carriers. See also, *What You Need to Know About Text-to-911* available at www.fcc.gov/text-to-911.

Parents and teens have also benefited from access to wireless service. In a 2010 study conducted by Pew Internet Research, 78% of teens responded that they felt safer when they had access to their cell phone.¹⁹ In the same study, 98% of parents of children who owned cell phones stated that the main reason they have allowed their children access to a wireless device is for the safety and protection that these devices offer.²⁰

Wireless access to the internet has also grown exponentially since the advent of the truly “smartphone” device. Cisco recently reported that global mobile data traffic grew 81% in 2013.²¹ In 2013, mobile data traffic alone was eighteen times greater than all global Internet traffic in 2000.²² Indeed, with the recent introduction of tablets, netbooks and wearable devices to the marketplace and increased M2M (“Machine to Machine”) connectivity, this type of growth is expected to persist with Cisco projecting that mobile data traffic will grow at a compound annual growth rate (CAGR) of 61% from 2013 to 2018.²³

3. Site Specific Public Need

¹⁹ Amanda Lenhart, *Attitudes Towards Cell Phones*, Pew Research, available at <http://www.pewinternet.org/Reports/2010/Teens-and-Mobile-Phones/Chapter-3/Overall-assessment-of-the-role-of-cell-phones.aspx>

²⁰ Id.

²¹ Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2013–2018 (Feb. 5, 2014).

²² Id.

²³ Id.; see also Connecticut Siting Council, 2013 Connecticut State-Wide Telecommunications Coverage Plan (Feb. 6, 2014).

The Facility proposed in this Application is an integral component of AT&T's network in its FCC licensed areas throughout the state. There is a significant coverage deficiency in the existing AT&T wireless communications network in the Redding Ridge Area including local roads, homes, businesses, and schools in the surrounding area. A deficiency in coverage is evidenced by the inability to adequately and reliably transmit/receive quality calls and/or utilize data services offered by the network. The proposed facility, in conjunction with other existing and approved facilities in and around Redding is needed by AT&T to provide its wireless services to people living in and traveling through this area of the state. Attachment 1 of this Application includes a Radio Frequency ("RF") Engineering Report with propagation plots and other information which identifies and demonstrates the specific need for a facility in this area of the State to serve the public and meet its need and demand for wireless services.

B. Statement of Benefits

Carriers have seen the public's demand for traditional cellular telephone services in a mobile setting develop into a requirement for anytime-anywhere wireless connectivity with critical reliance placed on the ability to send and receive, voice, text, image and video. Provided that network service is available, modern devices allow for interpersonal and internet connectivity,

irrespective of whether a user is mobile or stationary, which has led to an increasing percentage of the population to rely on their wireless devices as their primary form of communication for personal, business and emergency needs. The proposed facility would allow AT&T and other carriers to provide these benefits to the public that are not offered by any other form of communication system.

Moreover, AT&T will provide “Enhanced 911” services from the Facility, as required by the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, 113 Stat. 1286 (codified in relevant part at 47 U.S.C. § 222) (“911 Act”). The purpose of this federal legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress recognized that networks that provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care with reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill, or injured individuals, such as motorists and hikers. Carriers are able to help 911 public safety dispatchers identify wireless callers’ geographical locations within several hundred feet, a significant benefit to the community associated with any new wireless site.

In 2009, Connecticut became the first state in the nation to establish a statewide emergency notification system. The CT Alert ENS system utilizes the state Enhanced 911 services database to allow the Connecticut Department of Homeland Security and Connecticut State Police to provide targeted alerts to the public and local emergency response personnel alike during life-threatening emergencies, including potential terrorist attacks, Amber Alerts and natural disasters. Pursuant to the Warning, Alert and Response Network Act, Pub. L. No. 109-437, 120 Stat. 1936 (2006) (codified at 47 U.S.C. § 332(d)(1) (WARN), the FCC has established the Personal Localized Alerting Network (PLAN). PLAN will require wireless service providers to issue text message alerts from the President of the United States, the U.S. Department of Homeland Security, the Federal Emergency Management Agency and the National Weather Service using their networks that include facilities such as the one proposed in this Application. Telecommunications facilities like the one proposed in this Application enable the public to receive e-mails and text messages from the CT Alert ENS system on their mobile devices. The ability of the public to receive targeted alerts based on their geographic location at any given time represents the next evolution in public safety, which will adapt to unanticipated conditions to save lives.

C. Technological Alternatives

The FCC licenses granted to AT&T authorize it to provide wireless services in this area of the state through deployment of a network of wireless transmitting sites. Repeaters, microcell transmitters, distributed antenna systems (DAS) and other types of transmitting technologies are not a practicable or feasible means to providing service within the service area for this site. These technologies are better suited for specifically defined areas where new coverage is necessary, such as commercial buildings, shopping malls, and tunnels, or to address capacity. Closing the coverage gaps and providing reliable wireless services in western Farmington requires a tower site that can provide reliable service over a footprint that spans several thousand acres. The Applicant submits that there are no equally effective technological alternatives to the construction of one of the proposed facilities for providing reliable personal wireless services in this area of Connecticut.

IV. Site Selection and Tower Sharing

A. Site Selection

AT&T's network lacks reliable radiofrequency coverage in this area of Redding. From the outset, both MCM and AT&T were aware of the existing facility at the property of Redding Ridge Fire District 1. As an existing site, and one which was subject of a prior Siting Council approval, this was the clear preference to serve the area. Ultimately it was determined that at this location AT&T would

require antennas located at 150' AGL. MCM then developed a proposal in conjunction with AT&T to develop a tower Facility at the Redding Ridge Fire District 1 property.

B. Tower Sharing

The proposed Facility is designed to accommodate the antennas and equipment of AT&T, and will support the antennas and equipment of other carriers as may be needed as well as antennas of Redding Ridge Fire District 1.

V. Facility Design

The proposed Facility is a self-supporting 150' AGL monopole tower designed to accommodate emergency/municipal communications antennas as well as those belonging to federally licensed wireless carriers. AT&T would install up to twelve (12) panel antennas at a centerline height of approximately 150' AGL and some additional equipment on the tower. An associated 12' x 20' equipment shelter would be installed at the tower base on a concrete pad. AT&T's equipment shelter and space for the equipment of other carriers will be enclosed by an eight (8) foot tall chain link fence. A small retaining wall will wrap around the eastern portion of the compound and will require 20 CY of fill in addition to 80CY of crushed stone. Approximately 55 CY of materials will be removed as part of trenching activities.

Receptacles for generator hookups will be mounted on the exterior of the existing building adjacent to the equipment compound. Vehicle access to the Facility would extend from Black Rock Turnpike over an existing parking area to the tower compound. Utility connections would extend from the south underground from a proposed new utility pole to a multimeter center adjacent to the compound.

Attachment 3 contains the specifications for the proposed Facility, including an abutters map, site access maps, a compound plan, tower elevation, and other relevant details of the proposed Facility. Also included as Attachment 4 is a comparative Visual Resource Evaluation Report. Some of the relevant information included in Attachments 3 and 4 reveals that:

- No clearing of the compound area would be required for the construction of the proposed Facility;
- The proposed Facility will have no impact on water flow, water quality, or air quality;
- Areas from where the proposed Facility would be visible above the tree canopy year-round comprise a total of approximately 38 acres;
- When the leaves are off the trees, seasonal views through intervening tree trunks and branches are anticipated to occur over some locations within an area of ±264 acres; and

- The modest height increase of 30' in tower height, topography and vegetation above what was previously approved by the Siting Council will not open up significant new views of the facility.

VI. Environmental Compatibility

Pursuant to C.G.S. §16-50p (a) (3) (B), the Siting Council is required to find and determine as part of the Application process any probable impact of the Facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity, and fish and wildlife. As demonstrated in this Application, the proposed Facility will be constructed in compliance with applicable regulations and guidelines, and best practices will be followed to ensure that the construction of the proposed Facility will not have a significant adverse environmental impact similar to the proposal in Docket 334. In addition, the regular operation and monthly maintenance of the Facility will not have a significant environmental impact.

A. Visual Assessment

Included in Attachment 5 is a visual assessment which contains a view shed map and photo simulations of off-site views. It is anticipated that approximately only 38 acres of the 8,042-acre study area will have visibility of the proposed Facility above the tree canopy year round. Moreover only approximately 264 acres (or approximately 3.2% of the study area) will experience seasonal views

revealed through intervening branches and tree trunks during leaf-off conditions. Topography, vegetation and existing buildings would obscure, partially or totally, views of the 150' tower from several locations. It is also anticipated that visibility of the structure will be principally limited to areas located within a one-half mile radius of the proposed Facility, some of which already have views of the existing tower facility.

Weather permitting, the Applicants will raise a balloon with a diameter of at least three (3) feet at the proposed site on the day of the Siting Council's first hearing session on this Application, or at a time otherwise specified by the Siting Council.

B. Solicitation of State and Federal Agency Comments

Various consultations and analyses for potential environmental impacts are summarized and included in Attachment 4. Representatives of the Applicants submitted requests for review from federal and state entities including the Connecticut Department of Energy and Environmental Protection (CTDEEP) and the Connecticut State Historic Preservation Officer (SHPO). CTDEEP is being consulted for further information regarding a nearby area depicted on the State's Natural Diversity Database maps but no impact to threatened or special concern species is anticipated. Please see NDDB map included in Attachment 4.

No impact to historic resources is anticipated. It should be noted that prior consultation with SHPO and recent correspondence from the Town of Redding Historic Commission indicated concern for historic resources in the area. However, no impact to sensitive historic visual receptors is anticipated as predicted in the visual analysis included in Attachment 5. Prior due diligence conducted as part of the Docket 334 proposal and recent analysis both confirm that the host parcel belonging to Redding Ridge Fire District No. 1 has been substantially developed and reworked over time and as such holds very little potential for the presence of archeological resources.

Any correspondence from either agency will be forwarded to the Siting Council once received. As required by statute, this Application is being served on state and local agencies, which may choose to comment on the Application prior to the close of the Siting Council's public hearing.

C. Power Density

In August of 1996, the FCC adopted a standard for Maximum Permissible Exposure (MPE) for RF emissions from telecommunications facilities like the one proposed in this Application. To ensure compliance with the applicable standards, a maximum power density report is included herein as part of Attachment 4. The report concludes that the calculated worst-case emissions from AT&T's antennas are 6.46% of the MPE standard.

D. Other Environmental Factors

The proposed Facility would be unmanned, requiring monthly maintenance visits approximately one hour long. Carriers that maintain antennas and equipment at an approved Facility monitor same 24 hours a day, seven days a week from a remote location. The proposed Facility does not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Furthermore, the proposed Facility will neither create nor emit any smoke, gas, dust, other air contaminants, noise, odors, nor vibrations other than those created by any heating and ventilation equipment installed by carriers. During power outages an emergency generator would be utilized from which some emissions and noise would be produced. Overall, the construction and operation of the proposed Facility will not have a significant impact on the air, water, or noise quality of the area.

E. National Environmental Policy Act Review

The Applicants have evaluated the project in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852 (codified in relevant part at 42 U.S.C § 4321 et seq.) (NEPA). The existing site was not identified as a wilderness area, wildlife preserve, National Park, National Forest, National Parkway, Scenic River, State Forest, State Designated Scenic River or State Gameland. Furthermore, according to the site survey and field investigations, no federally regulated

wetlands or watercourses or threatened or endangered species will be impacted by the proposed Facility.

F. Air Navigation

Information regarding the proposed Facility was analyzed using the Notice Criteria tool of the Federal Aviation Administration (FAA). The FAA has issued a Determination of No Hazard to air navigation which is provided in Attachment 4.

VII. Consistency with the Town of Redding Land Use Regulations

Pursuant to the Siting Council's Application Guide, a narrative summary of the consistency of the project with the local municipality's zoning and wetland regulations and plan of conservation and development is included in this section. A description of the zoning classification of the site and the planned and existing uses of the proposed site location are also detailed in this section.

A. Redding's Plan of Conservation and Development

The Town of Redding Plan of Conservation & Development ("Plan"), effective December 2008, is included in the Bulk Filing. The Plan does not directly address wireless telecommunication facilities. The Plan does, however, recognize that advances in telecommunication technology and the services of wireless telecommunication providers have spurred a trend toward integrated work and residential settings.

B. Redding's Zoning Regulations and Zoning Classification

Section 5.19 of the Town of Redding Zoning Regulations sets forth the standards for communications tower siting, site design and setback requirements. Consistency of the proposed replacement Facility with these standards is illustrated in the table below.

Zoning Regulation	Standard or Preference	Proposed Replacement Facility
§ 5.19.1	FCC-licensed wireless facilities are permissible in Residential Zones.	The site is zoned R-2 and currently hosts a wireless facility.
§ 5.19.4	Provides a taxonomy of properties. Existing towers within Residential Zones are listed as "Class 3."	The existing and proposed replacement Facility is a "Class 3" facility.
§ 5.19.5	Excludes from various zoning standards and classification collocations at existing sites.	The proposed Facility is the use of an existing wireless site in the form of a replacement tower.

§ 5.19.5	Shall not be located within 250' of a residence.	The closest residence to the existing facility is located on site approximately 297' from the equipment compound.
§ 5.19.5	Shall not be located within 100' of a flagged wetland.	A delineated wetland is approximately 53' from the Facility compound.
§ 5.19.5	Shall not be located within 200' of the outer riparian zone of any perennial stream, watercourse, or vernal pool.	The site is not within 200' of the outer riparian zone of any perennial stream, watercourse or vernal pool.
§ 5.19.5	Shall not be located within 500' of a Historic District or property listed on the State or Federal Register of Historic Places	The site is not within 500' of a Historic District or property listed on the State or Federal Register of Historic Place.

§ 5.19.5	Shall not be located within the habitat of a listed rare or endangered wildlife species or rare plant species.	The site is not known to be within the habitat of a listed rare or endangered wildlife species or rare plant species.
§ 5.19.6	All-weather access roadway with parking, screening of parking and on-site structures	Access to the site is over an existing improved all-weather access road/parking area. Existing buildings, topography, trees, and fencing provide significant screening of the replacement ground based equipment. An existing parking area is being utilized.
§ 5.19.6	No night lighting of tower except for low-level minimum intensity lighting for security walks and fencing etc.	No lighting of the tower is proposed.
§ 5.19.6	Class 3 wireless facilities limited to 200' AGL.	The height of the proposed replacement tower is 150' AGL.

C. Planned and Existing Land Uses

The Facility is proposed at the location of an existing tower facility, a fire house and associated infrastructure. Properties immediately surrounding the subject site include single family residential homes, a church and a cemetery. Consultation with municipal officials did not indicate any planned changes to the existing or surrounding land uses. Copies of the Redding Zoning Code, Inland Wetlands Regulations, Zoning Map and Plan of Conservation and Development are included in the Bulk Filing.

D. Redding's Inland Wetlands and Watercourses Regulations

Redding's Inland Wetlands Regulations ("Local Wetlands Regulations") regulate certain activities conducted in "Wetlands" and "Watercourses" as defined therein. In this case, a review of available information regarding the site indicates a delineated wetland to be approximately 50' to the east of the proposed compound with erosion controls approximately 45 feet from the nearest wetland (identified as "Wetland 1" in the Wetland Investigation included in Attachment 4). Wetland 1 is a hillside seep system located at the base of the fill slope east of the existing fire station development. An interior intermittent watercourse conveys surface and seasonal groundwater discharges from this wetland and surrounding uplands to the south. An intermittent watercourse was also identified north of the host parcel originating from a stormwater outfall from Black Rock Turnpike. It should also be noted that the existing facility and

proposed replacement are located within the Hemlocks Reservoir System Watershed Area of the Aspetuck and Saugatuck Reservoirs public drinking water supply system.

No direct impact to wetlands and watercourses is associated with the proposed development. No temporary impacts to nearby wetland or watercourse resources from construction activities are anticipated in light of proposed sedimentation and erosion controls which will be designed and employed in accordance with the 2002 Connecticut Guidelines For Soil Erosion and Sediment Control, as established by the Council of Soil and Water Conservation. As noted on the drawings included in Attachment 3 a new retaining wall will be a permanent feature between the proposed compound and delineated wetland which will minimize necessary grading. Soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility. Therefore, the Applicant does not anticipate an adverse impact on any wetland or water resource.

VIII. Consultations with Local Officials

C.G.S. § 16-50/ (e) requires an applicant to consult about any proposed facility with the municipality in which a proposed Facility may be located and with any adjoining municipality having a boundary of 2,500 feet from the proposed

Facility. MCM, working together with AT&T, subsequently pursued a lease with the Redding Ridge Fire District 1.

After approval of the lease, the Applicants forwarded a Technical Report to the Town of Redding on December 31, 2013. The Town of Redding requested a public information meeting to review the Technical Report. This meeting was publically noticed in The Redding Pilot and a copy of that notice was also sent to abutting property owners. At a March 4, 2014 public information meeting, the Applicants' representatives provided an overview of AT&T's need in the area and details of the proposed Facility to attending interested citizens and municipal officials. No further consultation or information was requested from the public or Redding.

IX. Estimated Cost and Schedule

A. Overall Estimated Cost

The total estimated cost of construction for the proposed Facility is represented in the table below.

Requisite Component:	Cost (USD)
Tower & Foundation	240,000
Utility Installation	39,000
Facility Installation	54,000

	Subtotal MCM Cost	330,000
	Antennas and Equipment	250,000
	Subtotal AT&T Cost	250,000
B.	Total Estimated Costs	580,000

Overall Scheduling

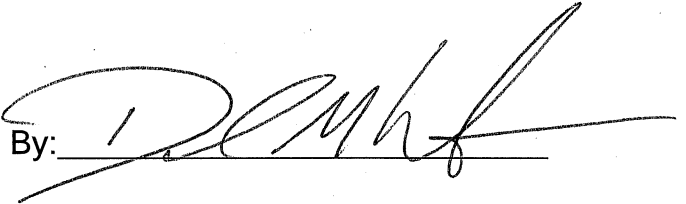
Site preparation work would commence following Siting Council approval of a Development and Management (“D&M”) Plan and the issuance of a Building Permit by the Town of Redding. The site preparation phase is expected to be completed within approximately 4 weeks including the removal of the existing tower and excavation. Installation of the tower, compound and utilities is expected to take an additional two weeks. It is anticipated that installation of carrier antennas and equipment as needed will be approximately another two weeks making the duration of the total construction schedule is approximately 8 weeks. Carriers typically require an additional two weeks post-construction for Facility integration and system testing.

X. Conclusion

This Application and the accompanying materials and documentation clearly demonstrate that a public need for the provision of wireless services to the public exists in eastern portion of Redding, including along Black Rock Turnpike as well as local roads, schools, and homes in the surrounding area. AT&T

has gaps in reliable wireless service in and around this area of the state. The Applicants respectfully submit that the public need for the proposed Facility outweighs any potential environmental effects resulting from the replacement of the existing facility at the site, which this Application demonstrates is insubstantial. Accordingly, the Applicants respectfully request that the Siting Council grant a Certificate of Environmental Compatibility and Public Need to MCM for a new wireless telecommunications Facility at the proposed location in Redding.

Respectfully Submitted,

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