

Petition No. 1121
Cellco Partnership d/b/a Verizon Wireless
353 Pumpkin Hill Road, Ashford
December 29, 2014

On November 25, 2014, the Connecticut Siting Council (Council) received a petition (Petition) from Cellco Partnership d/b/a Verizon Wireless (Cellco) for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed replacement of an existing telecommunications facility located at 353 Pumpkin Hill Road, Ashford. Specifically, Cellco seeks to replace an existing 300-foot guyed lattice tower with a new 240-foot self-supporting lattice tower. This Petition was field reviewed by Council member Robert Hannon and Michael Perrone of the Council staff on December 23, 2014. Attorney Kenneth Baldwin from Robinson and Cole LLP (representing Cellco); Matthew Gustafson, Forester and Scientist, from All Points Technology Corporation (APT); and subject property owner Tim Bunte also attended the field review.

The existing guyed lattice tower was installed circa 1984 in Docket No. 43 to support cable television (CATV) services for Charter Communications. The tower is no longer used for that purpose, and it currently supports Cellco's existing antennas at the 240-foot level of the tower, AT&T at the 197.5-foot level of the tower, and Tolland County Mutual Aid Fire Service, Inc. (TCMA) at the 224.5-foot and 227-foot levels of the tower. Multiple ground-mounted satellite dishes formerly used for CATV have been removed from the site.

On October 17, 2013, the Council granted a transfer of Docket No. 43 Certificate from Charter Communications to Cellco.

In order to improve wireless service in the area, Cellco seeks to make certain modifications to its existing co-location. These modifications include antenna replacements, installation of remote radio heads (RRHs), and fiber optic cables. However, the existing guyed lattice tower is not structurally capable of supporting Cellco's proposed facility modifications. Structural reinforcement of the existing tower was explored, but it was determined to be more costly than a tower replacement. Therefore, Cellco proposes to remove the 300-foot guyed lattice tower and replace it with a new 240-foot self-supporting lattice tower.

The new tower would be shorter than the existing tower because the highest existing carrier, Cellco, only requires 240 feet in tower height. The new tower would be designed to accommodate all existing carriers, as well as Cellco's proposed equipment upgrades. The new tower would also be designed with excess structural capacity so that new co-locations, or further modifications to existing co-locations could be accommodated. Cellco will continue to own the replacement tower. The replacement tower would be located within the existing fenced compound, approximately 88 feet to the southwest of the existing tower. Existing concrete pads that formerly supported the satellite dishes would be removed to the extent they interfere with the tower and foundation construction.

Cellco would install 12 panel antennas and six remote radio heads at the 240-foot level of the new lattice tower. Cellco would also remove the existing Charter Communications equipment shelter and install a new 12-foot by 30-foot equipment shelter to the east of the new tower to house its radio equipment and a diesel-fueled backup generator. After the new tower is constructed and all existing equipment is relocated onto the new tower, the existing guyed lattice tower would be removed.

Once Cellco's new equipment shelter is in place, and the new cell site is operational, Cellco would also remove its existing shelter and pad-mounted generator. AT&T and TCMA antennas would be located onto the replacement tower at the same antenna height that they maintain today. With the exception of six existing guy anchors (to be removed), all construction activity would remain within the limits of the existing fenced compound.

Two guy anchors from the existing tower are located less than 10 feet north of the access road within an inland wetland. (See attached photographs.) Furthermore, crushed stone berms were placed over the anchors, resulting in the filing of approximately 580 square feet of wetland. The contractor who performed that work was evidently unaware that the area was regulated wetlands. However, Cellco has committed to restoring the wetlands as part of the proposed project. Cellco's environmental consultant, APT has provided a Wetland Restoration Plan (WRP). The WRP includes excavation to remove fill material until the underlying native wetland soil is exposed. The wetland restoration area would be planted with native trees, shrubs, and herbaceous species and sown with a native New England wetland seed mix after grading is complete. An isolated patch of common reed, an aggressive invasive plant species, is located adjacent to the wetland restoration area. The common reed would be cut to the ground and treated with herbicide. With the WRP employed, the proposed project is not expected to adversely impact wetland resources. Staff recommends that, prior to construction, Cellco submit a three to five year plan for maintaining the restored wetland areas and monitoring and control of invasive species.

Cellco provided an Avian Resource Evaluation. The project would largely comply with the United States Fish and Wildlife Services guidelines for minimizing the potential to adversely impact migrating birds. The proposed tower would be an improvement with regard to minimizing bird impacts due to the lower height and elimination of the guy wires. However, the tower will still be lit (as is the existing tower) per the Federal Aviation Administration (FAA) requirements. Cellco plans to request that the FAA change the intermediate level non-flashing red lights to a flashing red light to achieve bird-friendly benefits. Council staff concurs with this request and recommends that Cellco provide FAA's final determination prior to operation of the new tower.

With regard to visual impacts, while the proposed self-supporting lattice tower has a wider profile, no new views of the tower would be created. Existing trees would help to screen the wider base of the self-supporting lattice tower. Furthermore, the height reduction results in a slightly smaller viewshed area than the existing tower.

The maximum worst-case power density for all users on the tower would be 17.1 percent of the applicable limit.

If approved, staff suggests including the following conditions:

- Prior to construction, Cellco shall submit a three to five year plan for maintaining the restored wetland areas and monitoring and control of invasive species;
- Prior to operation of the tower facility, Cellco shall provide the FAA's determination with respect to the type of lighting on the tower;
- Prior to construction, Cellco shall file the final structural design drawings for the tower and foundation (stamped by a Professional Engineer duly licensed in the State of Connecticut) with the Council.
- Unless otherwise approved by the Council, the existing guyed lattice tower shall be removed within 180 days of the installation of the new lattice tower;
- The Council shall be notified in writing when the existing self-supporting lattice tower is removed and the new tower is operational; and
- Any nonfunctioning antenna and associated antenna mounting equipment on this facility owned and operated by the Petitioner shall be removed within 60 days of the date the antenna ceased to function.

Notice has been provided to the Town of Ashford, the Town of Eastford (within 2,500 feet), as well as abutters, and the subject property owner. One abutter wrote to the Council with comments and noted that “...a smaller tower is welcomed.”

Cellco contends that this project would not have a significant adverse environmental effect.

Existing Tower



Existing Site and Proposed Tower Location



Guy Anchor Location #1 with Gravel Berm



Guy Anchor Location #2 with Gravel Berm

