

Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



WOODBRIAGE NORTH 2
118 NEWTON ROAD
WOODBRIAGE, CONNECTICUT

DOCKET NO. _____

MAY 13, 2021

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY.....	i
LOCATION MAP.....	ii
AERIAL PHOTO.....	iii
I. INTRODUCTION.....	1
A. Authority and Purpose	1
B. The Applicant.....	2
C. Application Fee.....	3
II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50l(b)	3
III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES	4
A. Federal Policy	4
B. Public Need and System Design	6
1. Need for the Woodbridge North 2 Facility	6
2. Proposed Cell Site Information.....	7
3. System Design and Cell Site Equipment	10
a. System Design.....	10
b. Cell Site Equipment.....	10
4. Technological Alternatives	11
C. Site Selection and Tower Sharing.....	12
1. Cell Site Selection.....	12
2. Tower Sharing.....	13
3. Overall Costs and Benefits.....	13
4. Environmental Compatibility.....	14
a. Primary Facility Impact is Visual.....	14
b. Environmental Reviews and Agency Comments.....	15
c. Radio Frequency Emissions.....	17
d. Other Environmental Issues	18
5. Consistency with Local Land Use Controls.....	18
a. Planned and Existing Land Uses.....	19
b. Plan of Conservation and Development	19

TABLE OF CONTENTS
(continued)

	Page
c. Zoning Regulations	19
d. Inland Wetlands and Watercourses Regulations.....	20
6. Local Input	21
7. Consultations With State and Federal Officials.....	21
a. Federal Communications Commission	22
b. Federal Aviation Administration (FAA).....	22
c. United States Fish and Wildlife Service	22
d. Connecticut Department of Energy and Environmental Protection	22
e. Connecticut State Historic Preservation Officer.....	23
D. Estimated Cost and Schedule.....	23
1. Overall Estimated Costs.....	23
2. Overall Scheduling.....	23
IV. CONCLUSION.....	23

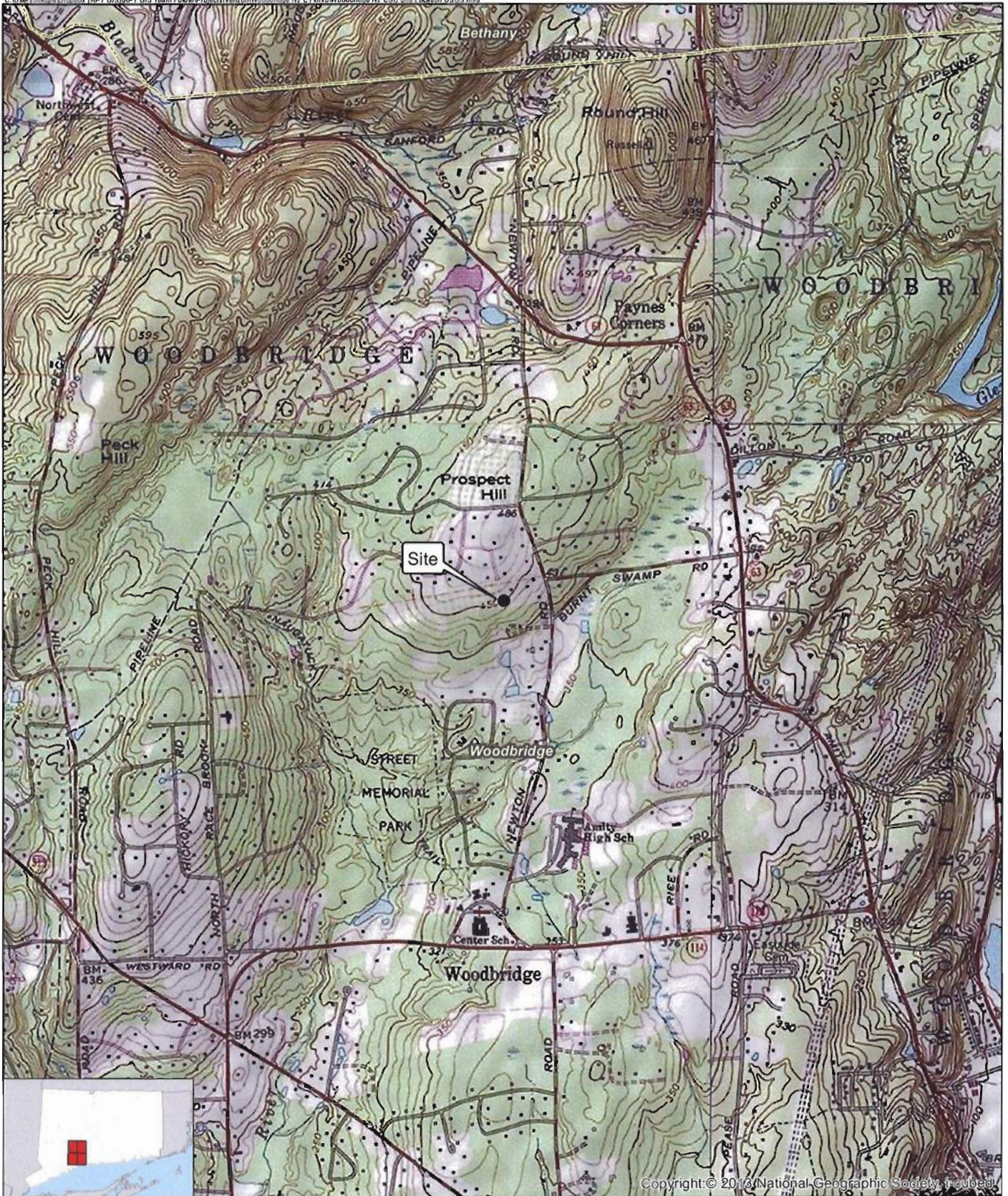
LIST OF ATTACHMENTS

1. Woodbridge North 2 Facility – Factual Summary and Project Plans
2. Certificate of Service of Application on Government Officials; and List of Officials Served
3. Legal Notice in the *New Haven Register*
4. List of Abutting Landowners and Certificate of Service; Notice Letter
5. Federal Communications Commission Licenses
6. Coverage Maps – Location of Woodbridge North 2 and Surrounding Cell Sites
7. Antenna and Equipment Specifications
8. Site Search Summary
9. Visibility Analysis
10. USFWS and NDDDB Compliance Determination
11. Wetlands Inspection Report
12. Preliminary Historic Resources Determination
13. Farmland Soils Map
14. General Power Density Table
15. National Flood Hazard Layer FIRMette
16. Public Information Meeting Legal and Abutters’ Notices and Presentation Materials
17. Federal Airways & Airspace Report
18. Land Lease Agreement - Redacted

EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 6.01-acre parcel at 118 Newton Road in Woodbridge, Connecticut (collectively the “Property”). The Property is owned by Michael Soufrine, Trustee for the Soufrine Family Trust. Cellco refers to this cell site as its “Woodbridge North 2 Facility”. The Woodbridge North 2 Facility will provide improved wireless voice and data services in north-central portions of Woodbridge, Connecticut where reliable wireless service is either lacking or non-existent today.

In order to resolve the wireless service problems, Cellco proposes to construct a 100-foot tall monopole tower within a 50’ x 50’ fenced compound (100’ x 100’ leased area) in the western portion of the Property. Cellco would install up to 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 extend above the top of the tower to a height of approximately 104 feet above ground level. Equipment associated with Cellco’s antenna, a propane-fueled back-up generator and a 500-gallon propane fuel tank would be located within a fenced facility compound. Vehicular access to the Woodbridge North 2 Facility would extend from Soundview Drive over a portion of an existing access driveway, then over a new driveway extension to the proposed cell site. Utilities would extend from existing utility service on Soundview Drive.



Copyright © 2013 National Geographic Society. All rights reserved.

Legend

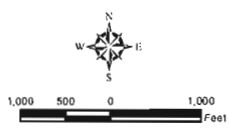
- Site
- Municipal Boundary

Site Location Map

Proposed Wireless
 Telecommunications Facility
 Woodbridge N2 CT
 118 Newton Road
 Woodbridge, Connecticut




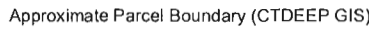


Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrange Maps, Ansonia, CT (1984), Mount Carmel, CT (1984),
 Naugatuck, CT (1984) and New Haven, CT (1984)
 Map Scale: 1:24,000
 Map Date: April 2020





Legend

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

Map Notes:
 Base Map Source: CT ECO 2019 Imagery
 Map Scale: 1 inch = 400 feet
 Map Date: April 2020



Site Location Map

Proposed Wireless
 Telecommunications Facility
 Woodbridge N2 CT
 118 Newton Road
 Woodbridge, Connecticut



**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE: :
 :
 :
APPLICATION OF CELLCO PARTNERSHIP : **DOCKET NO. ____**
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 :
118 NEWTON ROAD IN WOODBRIDGE, :
CONNECTICUT : **May 13, 2021**

**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 at 118 Newton Road in Woodbridge, Connecticut (collectively the “Property”). Cellco identifies this cell site as its “Woodbridge North 2 Facility”. The proposed Woodbridge North 2 Facility will consist of a 100-foot monopole tower in the westerly 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 equipment cabinets, a 30-kilowatt ("kW") propane-fueled generator and a 500-gallon propane fuel tank will be installed within a 50' x 50' fenced compound (100' x 100' leased area).

Included in this Application, as Attachment 1, is a factual summary and project plans for the proposed Woodbridge North 2 Facility. This summary, along with the other attachments submitted as part of this Application, contain 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: Timothy Parks, Real Estate Regulatory Specialist

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 Woodbridge North 2 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(b)

Copies of this Application have been mailed to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50(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 May 11 and May 12, 2021, by Cellco in the New Haven Register pursuant to C.G.S. Section 16-50(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(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 Woodbridge North 2 Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the “Act”). (Pub. L. No. 104-104, 140 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 policy¹ 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

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

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

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.

Included as Attachment 5 is a copy of the FCC's authorizations issued to Cellco for its 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 proposed Woodbridge North 2 Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Woodbridge North 2 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 and intends to deploy its 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequencies at the Woodbridge North 2 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 and around the Town of Woodbridge from nine (9) existing macro-cell sites (Woodbridge East, Woodbridge North, Woodbridge South 2, Westville West, Westville, Hamden, Hamden Relo, Bethany, and Ansonia East) and three (3) small cell sites (Hamden SC09, Hamden SC10 and Hamden SC12). Only two (2) of the twelve

(12) existing facilities (Woodbridge South 2 and Westville West) are actually located in the Town of Woodbridge and both are located in the southerly portion of the Town closer to the Wilbur Cross Parkway. All other wireless service in Woodbridge is provided by wireless facilities in the adjacent towns.

Wireless service plots showing the extent of wireless service in the area around the proposed Woodbridge North 2 facility reveal significant portions of Town where reliable service (service levels greater than or equal to Neg-95 dBm RSRP) is lacking in all of Cellco's operating frequencies. Little or no wireless service currently exists in Cellco's 1900 MHz and 2100 MHz frequencies. These wireless service deficiencies exist particularly along portions of Route 63 (Amity Road), Route 67 (Seymour Road) and Route 114 (Center Road), and in the area surrounding the Property, including the Amity Regional High School parcel and the Alice Newton Street Memorial Park. Coverage plots showing Cellco's "existing" wireless service in north-central Woodbridge and its wireless service with the addition of the proposed Woodbridge North 2 Facility are included in Attachment 6.

2. Proposed Cell Site Information

The proposed Woodbridge North 2 Facility would be located in the westerly portion of an approximately 6.01-acre parcel at 118 Newton Road. The Property is owned by Michael Soufrine, Trustee for the Soufrine Family Trust. The Property is used for residential purposes by the owner. At this site, Cellco would construct a 100-foot³ self-supporting monopole

³ Cellco originally proposed the installation of a 140-foot tower at the Property. In response to concerns raised by Town officials and neighbors to the Property, Cellco performed a drive test from the Property on March 10, 2021. After evaluating the Drive Test results, Cellco agreed to reduce the height of the tower to 100 feet. This reduction in antenna height does, however, result in coverage deficiencies along a portion of Route 67 to the northwest of the Property. Cellco believes that it can resolve this remaining service deficiency through the installation of a small cell facility targeted specifically to that area.

telecommunications tower within a 50' x 50' fenced compound (100' x 100' leased area). Cellco would install up to twelve (12) panel-type antennas and nine (9) remote radio heads on an antenna platform at the top of the tower. Cellco's antennas will extend approximately four (4) feet above the top of the tower. Equipment associated with Cellco's antennas, including an equipment cabinet and a 30-kW propane-fueled backup generator will be installed on a concrete pad, under a steel canopy structure within the fenced compound. A 500-gallon propane fuel tank would also be located 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 and when commercial power to the facility is interrupted. The facility 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 a month for approximately 30 minutes, and always during daytime hours.

Vehicular access to the proposed cell site would extend from Soundview Drive over a portion of an existing access driveway, then over a new driveway extension to the proposed cell site. Utilities would extend from existing utility service on Soundview Drive.

Cellco will deploy its 700 MHz, 850 MHz, 1900 MHz and 2100 MHz wireless services at the Woodbridge North 2 Facility. The proposed Woodbridge North 2 Facility would provide wireless service to a 1.2 mile portion of Route 63; a 0.1 mile portion of Route 67; a 1.9 mile portion of Route 114; and an overall area of 5.45 square miles at 700 MHz frequencies; a 1.2 mile portion of Route 63; a 0.1 mile portion of Route 67; a 1.9 mile portion of Route 114; and an overall area of 5.2 square miles at 850 MHz frequencies; a 0.25 mile portion of Route 63; a 0.0

mile portion of Route 67; a 0.25 mile portion of Route 114; and an overall area of 1.15 square miles at 1900 MHz frequencies; a 0.15 mile portion of Route 63; a 0.0 mile portion of Route 67; a 0.0 mile portion of Route 114; and an overall area of 0.6 square miles at 2100 MHz frequencies.

Cellco's existing surrounding cell sites that will interact with the proposed Woodbridge North 2 include: *Woodbridge South 2* - antennas on a tower at 77 Pease Road in Woodbridge, located approximately 2.0 miles southeast of the proposed Woodbridge North 2 Facility; *Woodbridge North* - antennas on a tower at 6 Progress Street in Seymour, located approximately 2.7 miles northwest of the proposed Woodbridge North 2 Facility. *Woodbridge East* - antennas inside a flagpole tower 100 Pond Lily Avenue in New Haven, located approximately 2.7 miles southeast of the proposed Woodbridge North 2 Facility. *Westville West* - antennas on the tower at 50 Woodfield Road in Woodbridge, located approximately 2.9 miles southwest of the proposed Woodbridge North 2 Facility. *Westville* - antennas on the roof of a building at 1015 Walley Avenue in New Haven, located approximately 3.6 miles southeast of the proposed Woodbridge North 2 Facility. *Hamden Relo* - antennas attached to a tower at 796 Woodin Street in Hamden, located approximately 2.8 miles southeast of the proposed Woodbridge North 2 Facility. *Bethany* - antennas on the tower at 93 Old Amity Road in Bethany, located approximately 2.6 miles northeast of the proposed Woodbridge North 2 Facility. *Ansonia East* - antennas on the tower at 401 Wakelee Avenue in Ansonia, located approximately 2.3 miles southwest of the proposed Woodbridge North 2 Facility. *Hamden SC09* - a small cell antenna attached to a utility pole near 465 Pine Rock Avenue in Hamden, located approximately 3.7 miles southeast of the proposed Woodbridge North 2 Facility. *Hamden SC10* - a small cell

antenna attached to a utility pole near 677 Pine Rock Avenue in Hamden, located approximately 3.7 miles southeast of the proposed Woodbridge North 2 Facility. *Hamden SC12* - a small cell antenna attached to a utility pole near 546 Circular Avenue in Hamden, located approximately 3.9 miles southeast of the proposed Woodbridge North 2 Facility.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Woodbridge North 2 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; nine (9) RRHs; two (2) HYBRIFLEX™ fiber optic antenna cables; and a GPS antenna. Back-up power to the Woodbridge North 2 Facility will be provided by a back-up battery system and a 30-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 Woodbridge North 2 Facility would satisfy this goal and provide high-quality reliable wireless service along portions of Routes 63 and 67, the primary service objective, and also along Routes 69, 114 and 313 and local roads, as well as residential areas around the Property, including Amity Regional High School and the Alice Newton Street Memorial Park.

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. A list of existing towers or other non-tower structures considered is described above and included in Attachment 8. Cellco currently shares each of these existing towers, in the area around the Woodbridge North 2 Facility location. These existing sites are identified on the coverage maps included in Attachment 6 and are listed above. The adjacent cell sites cannot, however, satisfy the coverage objectives for the Woodbridge North 2 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 central portions of Woodbridge.

Cellco initiated a site search process for the Woodbridge North 2 cell site in 2014 and was

unable to find a viable option for tower development. The Project was put on hold in 2015. The site search effort was reinitiated in 2016 when Cellco identified the Property as a viable candidate for a cell site. Cellco initially determined that an antenna centerline height of 140 feet at this location was needed to satisfy its wireless service objectives in the area. In response to concerns raised by Town officials and neighbors to the Property, Cellco was able to reduce the tower height by 40 feet and now proposes the installation of a 100-foot monopole tower. 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 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 Woodbridge has expressed any interest in the Woodbridge North 2 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 Woodbridge.⁴ The Woodbridge North 2 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 Woodbridge North 2 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

⁴ 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.

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 Visual Assessment & Photo Simulations (“Visual Assessment”) prepared by All-Points Technology Corporation (“APT”) for the Woodbridge North 2 Facility. The Visual 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 Visual Assessment, views of the tower would be limited to the area immediately surrounding (within 0.25 miles) the Property. Areas where the monopole tower would be visible above the tree canopy comprise approximately 11 acres. The nearest year-round visibility of the Woodbridge North 2 Facility tower would be from the end of Soundview Drive to the north. Areas of seasonal views (including views through trees in the winter months) would comprise approximately 47 additional acres. Together, the areas where year-round and seasonal views of the tower represent an area that is less than one percent (0.72%) of the 8,042-acre (two-mile radius) study area.

There are thirty-one (31) residences within 1,000 feet of the Woodbridge North 2 Facility. The closest off-site residence is located at 15 Penny Lane, approximately 360 feet to the southwest and is owned by Xiang Li. There are no schools or commercial day care facilities located within 250 feet of the proposed Woodbridge North 2 Facility.

b. Environmental Reviews and Agency Comments

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 Woodbridge North 2 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 & NDDDB Reviews

According to the USFWS, Migratory Birds & NDDDB 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 Woodbridge North 2 Facility will not adversely affect the NLEB.

The proposed Woodbridge North 2 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/NDDDB maps of the Property. (See Attachment 10).

(2) Wetlands Inspection Report

As discussed in Section III.C.5.d. below, there are no wetland areas on the Property. The closest off-site wetland area is located approximately 830 feet to the south. Due to the distance

from the facility compound to the nearest wetland area, we do not anticipate that facility construction will impact these wetland areas. (See Wetlands Inspection Report – Attachment 11).

(3) State Historic Preservation Officer

According to a Preliminary Historic Resources Determination prepared by APT for the Woodbridge North 2 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 Woodbridge North 2 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.⁵ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), the Property and all of the surrounding residential parcels are designated Prime Farmland Soils. (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 Woodbridge North 2 Facility according to the methodology prescribed by the FCC Office of

⁵ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

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 Woodbridge North 2 Facility would remain well below (17.73%) the FCC’s Standard. Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations. A worst-case General Power Density table is included in Attachment 14.

d. Other Environmental Issues

No sanitary facilities are required for the Woodbridge North 2 Facility. The operations at the Woodbridge North 2 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 Woodbridge North 2 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 Woodbridge North 2 Facility would be located on an approximately 6.01-acre parcel owned by Michael Soufrine, as Trustee for the Soufrine Family Trust. The Property is zoned Residential - A and is used for residential purposes. The Property is surrounded by developed and undeveloped residential parcels.

b. Plan of Conservation and Development

The Town of Woodbridge Plan of Conservation & Development (the “Plan”), adopted on March 23, 2015, does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. The Plan does, however, recognize the need to establish strong communications systems generally “to ensure that vulnerable residents” are properly protected during an emergency. (*See* Chapter 8: Sustainability Strategy Section 4 of the Plan). Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Woodbridge GIS and Real Property Information System, the Property is located in the Town’s Residence “A” zone. According to Table 3.1, Telecommunications Facilities are permitted in the A Residence zone subject to the approval of a Special Exception. The Woodbridge Zoning Regulations state that telecommunications facilities shall be located in the following order of preference: existing towers and other non-tower structures when available; the location of towers where adequate screening of the facility is available; the use of towers in the Business or Industrial zone districts; the use of government buildings in residential districts; and the use of new towers in residential zones. The regulations require Telecommunications

Facility applicants to investigate alternative sites; allow for joint use of a tower; avoid clustering of towers in residential areas; provide for screening of the facility if appropriate; discourage lighting of the structure; prohibit signage on the tower; provide parking for maintenance vehicles; and remove the facility when it is no longer in use. Cellco respectfully submits that the proposed facility complies with each of these zoning provisions. The Zoning Regulations require towers to be setback a distance equal the tower's height plus 50 feet from adjacent residential property lines, in this case 150 feet. The proposed tower is setback 291 feet from the northern property line, 370 feet from the eastern property line, 128 feet from the southern property line and 64 feet from the western property line (the undeveloped extension of Soundview Lane). *See* Zoning Regulations Section 3.3.OO.

d. Inland Wetlands and Watercourses Regulations

The Woodbridge 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 100 feet from a wetland, involving removal or deposition of material, or any obstruction, construction, alteration or pollution, of such wetlands or watercourses. (*See* Section 2.1 of the Wetlands Regulations). Four (4) copies of the Woodbridge Wetlands Regulations were filed, in bulk, with the Council. APT completed a thorough wetlands investigation to assess and evaluate potential impacts of the proposed facility. A copy of a Wetlands Inspection Report is included in Attachment 11. As mentioned in the Wetlands Inspection Report, the closest wetland area to the tower site is approximately 830 feet to the south of the tower site.

According to the Federal Emergency Management Agency Flood Insurance Rate Map

(“FIRM”), the Woodbridge North 2 Facility would be located in Flood Zone X, an area of minimal flooding, outside the 500-year flood zone. A copy of the National Flood Hazard Layer FIRMette map is also included in Attachment 15.

6. Local Input

Section 16-50~~(e)~~(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On July 17, 2020, Cellco representatives commenced the ninety (90) day municipal consultation process. First Selectwoman Heller received a copy of technical information summarizing Cellco’s plans to establish a telecommunications facility at the Property as described above. Four (4) copies of Cellco’s Technical Report were filed in bulk with the Council.

On July 28, 2020, Cellco responded to questions from the Town Attorney about the proposed facility. On September 15, 2020, the Town requested that Cellco host a Virtual Public Information Meeting (“VPIM”) on the proposed tower site. The VPIM was held on October 22, 2020. Notice of the VPIM was published in the New Haven Register on October 7, 2020 and was sent to abutting landowner on October 6, 2020. A list of abutting landowners notified of the VPIM, a copy of the notice letter sent to abutters and a copy of the Legal Notice of the VPIM is included in Attachment 16. Following the VPIM, Cellco received additional comments and questions and evaluated additional alternative tower sites suggested by Woodbridge residents and Town officials.

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 Woodbridge North 2 Facility.

a. Federal Communications Commission

The FCC did not review this particular 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 Woodbridge North 2 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 17.

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 Woodbridge North 2 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 Woodbridge North 2 Facility is approximately \$425,000. This estimate includes:

- (1) Cell site radio equipment\$150,000
- (2) Tower50,000
- (3) Generator25,000
- (4) Miscellaneous (e.g. site preparation, access, grading, utilities)20,000

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 Woodbridge North 2 Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town 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 Woodbridge North 2 Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS



By: _____

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, Connecticut 06103-3597
(860) 275-8200
Attorneys for the Applicant