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October 20, 2022

Via Federal Express

Melanie Bachman, Esq.
Executive Director and Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 510 – Application of New Cingular Wireless PCS LLC d/b/a AT&T and Tarpon Towers II LLC For A Certificate Of Environmental Compatibility And Public Need For The Construction, Maintenance And Operation Of A Wireless Telecommunications Facility At 92 Greens Farm Road, Westport, Connecticut**

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced Application for the construction, operation and maintenance of a new telecommunications facility at 92 Greens Farm Road in Westport, Connecticut.

On May 26, 2022, New Cingular Wireless PCS LLC d/b/a AT&T and Tarpon Towers II LLC (collectively, the “Applicant”) filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Proposed Facility”) on an approximately 1.99-acre parcel at 92 Greens Farm Road, Westport, Connecticut (the “Property”). The Property is owned by Pradiv Mahesh and Sharuna Moola-Mahesh and is used for residential purposes.

On June 23, 2022, the Council approved Cellco’s Petition to Intervene in Docket No. 510. If approved by the Council, Cellco intends to share the Proposed Facility by installing antennas on the tower and associated equipment on the ground within a new facility compound.

Facility Description

The Applicant proposes to construct a 124-foot monopole tower, in the central portion of the Property within a 35' x 64' fenced compound. Cellco would install antennas and remote radio heads on an antenna platform at the 108-foot level on the tower. Cellco would install radio cabinets and a backup battery cabinet on a concrete slab near the base of the tower. Cellco also plans to install a 30-kW diesel-fueled backup generator within the fenced facility compound. Access to the Proposed Facility would extend from Greens Farm Road over a new gravel access driveway. Utilities to the tower site will extend from existing service along Greens Farm Road.

Cellco has submitted ample and unrefuted evidence into the Docket No. 510 record to demonstrate its need for improved wireless service in Westport, particularly in the area around the Property, including along significant portions of Interstate 95 ("I-95"), the Metro-North rail line and local roads in the area. The record also contains ample evidence that the nature of the probable environmental effects associated with the Proposed Facility are not substantial and do not outweigh the need for the Proposed Facility.

Public Need

The evidence in the Docket No. 510 record reveals that Cellco currently experiences significant gaps in wireless service in the area around the Proposed Facility in its 700 MHz, 1900 MHz and 2100 MHz frequency ranges, particularly along I-95, the Metro-North rail corridor, Greens Farm Road and Hills Point Road. With antennas at the 108-foot level on the Proposed Facility, Cellco will be able to fill these gaps in service and improve overall wireless services in the area.

In addition to these significant coverage benefits, the Proposed Facility will also allow Cellco to provide capacity relief to its existing Westport, CT cell site (Beta sector antennas) which is currently operating at or above its existing capacity limits. Significant improvements in the level of reliable service in these areas will occur once the Proposed Facility is constructed and Cellco's cell site is activated.

Cellco's need for wireless service described above cannot be satisfied by the use of small cell facilities as suggested by the Town. Small cell facilities have a very small coverage footprint (approximately 0.15 mile radius around the small cell). Small cells also have very limited capacity, handling only a few wireless customers at any one time. The Proposed Facility will allow Cellco to provide services that meets or exceeds its minimum signal strength thresholds to a much larger service area around the Proposed Facility, in all of its licensed

frequencies, and provide the capacity relief needed for the Westport CT facility.

Cellco has installed and currently operates two small cell facilities to the south and west of the Proposed Facility, identified on Cellco's coverage plots as its Westport SC2 and Westport SC2A facilities. Even with these small cell facilities in service, Cellco still experiences the significant coverage gaps and capacity problems described above. Both of these existing small cell facilities would interact with the Proposed Facility once Cellco's service is activated.

Nature of Probable Environmental Impacts

The record contains ample evidence to support a finding by the Council that the Proposed Facility would not have a significant adverse impact on the environment at the Property or the surrounding area. The Applicant has presented evidence that the location and development of the Proposed Facility will have no effect on historic or archeological resources; will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not result in any significant impact on wetlands or watercourses on or near the Property; will not result in an adverse impact to Prime Farmland or Statewide important farmland soils located on the Property; will not be considered to be an obstruction or hazard to air navigation and, therefore, will not require any FAA marking or lighting; and will operate well within safety limits established by the FCC for radio frequency emissions.

In addition, Cellco presented evidence that its intended use of a 30-kw diesel-fueled backup generator at the Proposed Facility will not impact nearby off-site wetlands. Due to space limitations in the Proposed Facility compound, Cellco is unable to install a propane-fueled tank at this location. The diesel-fueled generator that Cellco plans to use is equipped with a special fuel storage system including tertiary fuel and fluid containment and leak detection alarms monitored around the clock by Cellco's cell site technicians. According to Dean Gustafson, the Applicant's wetland's expert, with the proposed tertiary containment system and 24/7 monitoring, the proposed diesel generator will not adversely impact nearby (off-site) wetland resources.

Under normal operating conditions, Cellco's cell site equipment would generate no air emissions. If Cellco's generator is needed to operate its cell site equipment, the generator will be managed to comply with the state's "permit by rule" criteria established by the Air Management Bureau of the Connecticut DEEP (R.C.S.A. §22a-174-3b).

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Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the Proposed Facility and that the environmental impacts from the Proposed Facility location would be limited and outweighed by the benefits to the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth C. Baldwin

KCB/
Copy to:
Service List