

July 22, 2022

VIA ELECTRONIC AND CERTIFIED MAIL

Connecticut Siting Council Attn: Melanie Bachman, Executive Director Ten Franklin Square New Britain, CT 06051

RE: Proposed relocation of wireless telecommunications facility from 28 Sidney Street, Stratford, to nearby 200 East Main Street, Rear, Stratford.

Dear Attorney Bachman:

I write on behalf of Barrett Outdoor Communications ("Barrett"). Barrett is filing with the Connecticut Siting Council ("Council") an Application for a Certificate of Environmental Compatibility and Public Need ("Application"). Fifteen (15) copies and one (1) original, along with the filing fee, have been sent to your attention via certified mail. You are also receiving a copy of the application via electronic mail.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Jesse A. Langer



STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

RE: APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AT 200 EAST MAIN STREET REAR, STRATFORD, CONNECTICUT

APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

July 22, 2022

TABLE OF CONTENTS

I.	INTRODUCTION1				
	A. AUTHORITY AND PURPOSE	. 1			
	B. PETITION 1467	. 1			
	C. THE APPLICANT	. 1			
	D. APPLICATION FEE				
	C. COMPLIANCE WITH GENERAL STATUTES	. 2			
II.	SERVICE AND NOTICE REQUIRED BY GENERAL STATUTES	. 2			
III.	STATEMENT OF NEED AND BENEFITS	. 3			
IV. THE FACILITY AND SITE SELECTION					
	A. THE PROPERTY	. 4			
	В. ТНЕ FACILITY	. 4			
	C. SITE SELECTION	. 5			
V.	NVIRONMENTAL COMPATIBILITY	. 5			
	A. VISIBILITY	. 6			
	8. RADIO FREQUENCY/POWER DENSITY				
VI.	COMMUNITY OUTREACH	. 8			
	A. COLLABORATION WITH STATE AND LOCAL OFFICIALS	. 8			
VII	ESTIMATED COST AND SCHEDULE	. 8			
	A. OVERALL ESTIMATED COST				
	B. Overall Scheduling	-			
VII	CONCLUSION	. 9			

ATTACHMENTS

- Attachment 1 Site Plan, Topographic Site Map and Aerial Image
- Attachment 2 Certificate of Service, with List of Agencies and Officials
- Attachment 3 Notice to Abutters and Certification
- Attachment 4 Radio Frequency Analysis Report
- Attachment 5 Extension of FAA Determination
- Attachment 6 Visibility Assessment

Attachment 7 – Radio Frequency Exposure Report

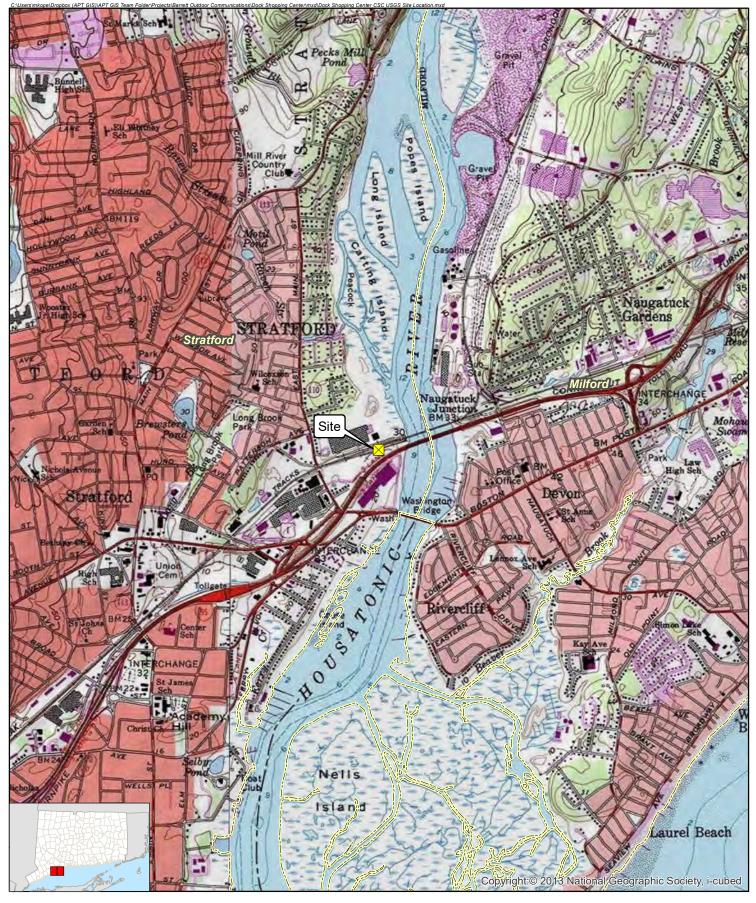
EXECUTIVE SUMMARY

Barrett Outdoor Communications, Inc. ("Barrett") seeks to construct, maintain and operate a wireless telecommunications facility ("Facility") on real property commonly known 200 East Main Street, Rear, Stratford, Connecticut ("Property"). The Property is an approximate 4.37 acre parcel located east of East Main Street in the Town of Stratford. The Property sits within a Retail Commercial District (CA) and is used as a storage area for boats. The Property is developed with a single metal framed building on an asphalt lot, enclosed with a tall, chain-link fence, with entrances located at the east end of the parcel.

The proposed Facility would consist of a 4,210 square foot compound and telecommunications easement area. The compound would include an elevated equipment platform consisting of approximately 1,489 square feet, which can be expanded another 240 feet to accommodate an additional equipment bay. The Facility would include a monopole with a height of 135 above grade level ("AGL"), with a lightning rod on top. The monopole would be designed for a twenty foot extension. The Facility would host the following antenna arrays: (1) New Cingular Wireless PCS, LLC's (AT&T), with a centerline of 132 feet AGL and (2) Cello Partnership *d.b.a.* Verizon Wireless ("Verizon") with a centerline of 121 feet AGL.¹

Related equipment cabinets would be placed on the elevated equipment platform nearby within the leased area. The compound would be surrounded by an eight foot chain link fence with anti-climb mesh. Access to the proposed tower would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer.

¹ DISH Wireless L.L.C. has verified an interest in collocating its antenna array on the proposed Facility.



500

1,000 Feet

Legend

Site

Municipal Boundary

<u>Map Notes:</u> Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps. Bridgeport, CT (1984) and Milford, CT (1984) Map Scale: 1:24,000 Map Date: May 2022

Site Location Map

Proposed Wireless Telecommunications Facility Dock Shopping Center 200 East Main Street, Rear Stratford, Connecticut





200

Legend



Approximate Parcel Boundary

Municipal Boundary

<u>Map Notes:</u> Base Map Source: CT ECO 2019 Imagery Map Scale: 1 inch = 400 feet Map Date: October 2021

Site Location Map

400 Feet

Proposed Wireless Telecommunications Facility Dock Shopping Center 200 East Main Street, Rear Stratford, Connecticut



I. INTRODUCTION

A. Authority and Purpose

Pursuant to General Statutes §§ 16-50g *et seq.* and 16-50j-1 *et seq.* of the Regulations of Connecticut State Agencies, Barrett Outdoor Communications, Inc. ("Barrett"), hereby submits this Application for a Certificate of Environmental Compatibility and Public Need ("Certificate") to the Connecticut Siting Council ("Council") for the construction, maintenance and operation of a 135 foot AGL monopole wireless telecommunications facility ("Facility") on real property commonly known as 200 East Main Street, Rear, Stratford, Connecticut ("Property"). The site plan, topographic site map and aerial of the Facility are appended hereto as <u>Attachment 1</u>.

B. Petition 1467

Barrett submitted previously a petition for declaratory ruling concerning this site, which was docketed as Petition 1467 by the Council. The Council and its staff thoroughly vetted the proposed site to determine whether the proposal would have an adverse environmental effect. Based on this thorough review, the staff report did not indicate any adverse environmental impacts and recommended conditions typical of a proposed telecommunications facility. The Council ultimately denied Petition 1467 because it concluded that an application for a Certificate was necessary. Accordingly, Barrett submits this Application incorporating by reference the full record of Petition 1467. This submission is therefore limited to supplemental information addressing the inclusion of AT&T because the Petition contemplated a twenty foot extension to accommodate AT&T at some future date. *See* <u>Attachment 1</u>.

C. The Applicant

Barrett is a stock corporation organized under the laws of the State of Connecticut, with a business address of 381 Highland Street, West Haven, Connecticut. Barrett hosts wireless

installations on billboard structures and is intimately involved in the design of those wireless installations and maintenance of the underlying structures. Communications concerning this application should be addressed to the attorneys for Barrett as follows:

Updike, Kelly & Spellacy, P.C. One Century Tower 265 Church Street, 10th Floor New Haven, CT 06510 Telephone: (203) 786-8317 Attention: Jesse A. Langer

D. Application Fee

The estimated total construction cost for the Facility would be less than \$5,000,000. In accordance with § 16-50v-1a(b) of the Regulations of Connecticut State Agencies, a check made payable to the Council in the amount of \$1,250 accompanies this Application.

E. Compliance with General Statutes § 16-50r

Barrett is not engaged in generating electric power in the State of Connecticut; therefore, the proposed Facility is not subject to General Statutes § 16-50r. The Facility has not been identified in any annual forecast reports and, thus, is not subject to General Statutes § 16-50r(c).

II. SERVICE AND NOTICE REQUIRED BY GENERAL STATUTES § 16-50/(b)

Pursuant to General Statutes § 16-50*l*(b), Barrett sent copies of this Application to municipal, regional, State and Federal agencies and officials. A certificate of service, along with a list of the agencies and officials served with a copy of the Application, is appended hereto as <u>Attachment 2</u>. Barrett has also published notice of its intent to file this Application on two separate occasions in the *Connecticut Post* in accordance with § 16-50*l*(b). Copies of the legal notices and certificate of publication will be filed with the Council upon receipt. Furthermore, in compliance with § 16-50*l*(b), Barrett sent notices to each person appearing of record as the owner of real

property abutting the Property. Certification of such notice, a sample notice letter, and a list of all property owners to whom the notice was mailed are appended hereto as <u>Attachment 3</u>.

Additionally, Barrett sent an email to each agency and official with a link to the Council's website specifically concerning Petition 1467 to provide easy access to the full record of that proceeding. Each agency and official listed in <u>Attachment 2</u> also received notice of Petition 1467 contemporaneously with that filing in accordance with § 16-50j-40 of the Regulations of Connecticut State Agencies.

III. STATEMENT OF NEED AND BENEFITS

Petition 1467 detailed the need for the installation as well as the benefits associated therewith. Barrett incorporates that narrative herein including radio frequency ("RF") data and attachments, particularly as they relate to Verizon. Additionally, AT&T has a significant coverage deficiency in the area proximate to the proposed Facility. The targeted area includes Interstate 95, secondary roadways and the residential and business properties in the vicinity. The existing terrain characteristics, coupled with the location of existing sites, limit AT&T's options to provide reliable coverage in the areas proximate to the proposed Facility. The proposed Facility would fill existing coverage gaps and improve network reliability in this area of the Town of Stratford ("Stratford"). Appended hereto as <u>Attachment 4</u> is a Radio Frequency Analysis Report, including propagation plots, depicting AT&T's need for the proposed Facility.

The proposed Facility is necessary to maintain the existing coverage, including Emergency 911 service, associated with Verizon's wireless network and to meet the aforementioned coverage and network reliability objectives of AT&T. The Facility would also accommodate two additional wireless carriers, including DISH who has expressed an interest, and municipal emergency communications equipment as needed.

3

IV. THE FACILITY AND SITE SELECTION

A. The Property

The Property is an approximate 4.37 acre parcel located east of East Main Street in Stratford. The Property sits within a Retail Commercial District (CA) and is used as a storage area for boats. The Property is developed with a single metal framed building on an asphalt lot, enclosed with a tall, chain-link fence, with entrances located at the east end of the parcel. The Property is tucked between the Metro North rail line to the north, the Housatonic River to the east, commercial development to the west, and Interstate 95 to the south.

B. The Facility

The Facility is proposed in the northern portion of the Property and would consist of a 4,210 square foot compound and telecommunications easement area. The compound would include an elevated equipment platform consisting of approximately 1,489 square feet, which can be expanded another 240 feet to accommodate an additional equipment bay. A 135 foot AGL monopole, with a lightning rod on top, would host AT&T's antenna array at a centerline of 132 feet AGL and Verizon's antenna array at a centerline of 121 feet AGL. The monopole would be designed for a twenty foot extension.

Related equipment cabinets would be placed on the elevated equipment platform nearby within the leased area. The compound would be surrounded by an eight foot chain link fence with anti-climb mesh. Access to the proposed tower would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer. *See* <u>Attachment 1</u>.

C. Site Selection

Petition 1467 included a detailed explanation as to the selection of the Property for the proposed Facility. Barrett also provided responses to interrogatories issued by the Council requesting additional information on the surrounding area and the availability (or lack thereof) of alternative sites. This explanation also applies to AT&T. AT&T's collocation on the Facility would promote Connecticut's policy of collocation to "avoid the unnecessary proliferation of towers" pursuant to General Statutes § 16-50aa. The Property is ideally situated to achieve the coverage and capacity objectives of Verizon and AT&T.

V. ENVIRONMENTAL COMPATIBILITY

In accordance with General Statutes § 16-50p, the Council is required to find and determine, among other things, the probable environmental impact of the Facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife. As set forth in this Application, the Facility would not have a substantial adverse environmental effect. Barrett commissioned All-Points Technology Corporation, P.C. ("All-Points") to perform a comprehensive environmental review of the Facility.

This comprehensive environmental review is detailed in Petition 1467 and applies to this Application. In addition to the comprehensive environmental reports provided by All-Points, the record in Petition 1467 reflects responses to over 100 interrogatories, many of which addressed environmental matters. Also appended hereto as <u>Attachment 5</u> is an extension of the Federal Aviation Administration's determination that the Facility would not constitute a hazard to air navigation and otherwise would not require additional measures or authorizations from the FAA.

5

A. Visibility

The visual impact of the proposed Facility would vary from different locations around the proposed Facility depending on factors such as topography, vegetation and distance from the Facility, as well as the location of structures around the Facility. A Visibility Assessment prepared by APT, including viewshed maps and photo-simulations of the potential views of the proposed Facility is appended hereto as <u>Attachment 6</u>.

As part of its visibility assessment, APT conducted field reconnaissance on March 23, 2021, during leaf-off conditions. APT utilized a crane at the proposed situs of the monopole, with a bright red flag attached to the top of the boom at a height of approximately 135 feet AGL, during favorable weather conditions (sunny skies and calm winds). During its field reconnaissance, APT took photographs from a variety of publicly accessible locations to depict representative images of potential views of the proposed Facility.

The topography and vegetation within a two mile radius of the proposed Facility ("Study Area") serve to minimize the potential visual impact of the Facility. Only 15.5 percent (1,244 acres) of the Study Area would potentially have year-round views of portions of the proposed Facility. Approximately 94 percent of those views (1,168 acres) would occur over open water and the tidal wetlands associated with the mouth of the Housatonic River. The potential seasonal views of the proposed Facility would include approximately 197 acres. The total potential year-round and seasonal views of the proposed Facility, including those from the water, represent approximately 17.9 percent of the Study Area.

The potential landward year-round views of the proposed Facility would be limited primarily to the commercial areas immediately surrounding the situs of the proposed Facility and along Interstate 95, within 0.5 to 0.75 miles of the facility. The nearest potential residential yearround views of the proposed Facility are from over 0.25 miles away.

The character of those limited potential views demonstrate that the proposed Facility would not have a substantial adverse environmental effect in the state. The existing conditions include infrastructure associated with the nearby rail line, raised sections of I-95, electrical transmission structures and large swaths of retail and commercial development.

General Statutes § 16-50*l*(g)(1) requires an applicant to include in its Technical Report to the host municipality "the location of all schools near the proposed facility, an analysis of the potential aesthetic impacts of the facility on said schools, as well as a discussion of efforts or measures to be taken to mitigate such aesthetic impacts" APT determined that there are no schools or commercial day care centers within 250 feet of the proposed Facility. The nearest school, Wilcoxson Elementary School, is located approximately 0.52 miles to the northwest of the proposed Facility. The nearest commercial day care center, Mama N' Cubs Playschool, LLC, is located approximately 0.54 miles to the southeast of the site. Based on APT's thorough assessment, including a field reconnaissance, APT does not predict that either would have views of the proposed Facility. See <u>Attachment 6</u>.

B. Radio Frequency/Power Density

The FCC has adopted a standard for exposure to RF emissions from telecommunications facilities. C Squared Systems, LLC performed a maximum density calculation in accordance with the standards are set forth in a bulletin published by the FCC, specifically the FCC's Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997). The results of those calculations demonstrate that the proposed Facility would operate within the standards set by the FCC. A copy of the Radio Frequency Exposure Report is appended hereto as <u>Attachment 7</u>.

7

VI. COMMUNITY OUTREACH

A. Collaboration with State and Local Officials

In connection with Petition 1467, Barrett consulted with Stratford and the City of Milford ("Milford"), as Milford's legal boundary is within 2,500 feet of the proposed Facility. Barrett also submitted a technical report to both municipalities. Both municipalities thereafter provided letters of support, which were appended with Petition 1467 and included as part of the record.² Neither Stratford nor Milford requested a public information session or recommended alternative sites. The Council's staff report noted that Barrett complied with the municipal consultation requirement under General Statutes § 16-50*l*.

VII. ESTIMATED COST AND SCHEDULE

Section 16-50j-74 (11) and (12) of the Regulations of Connecticut State Agencies require the applicant for a Certificate to provide a statement of the estimated cost and schedule for proposed Facility.

A. Overall Estimated Cost

The total estimated cost of construction for the Facility is \$300,000. This estimate includes:

- 1. Foundation: \$45,000
- 2. Tower: \$65,000
- 3. Site Development Costs: \$115,000
- 4. Utility Installation Costs: \$75,000

The estimate excludes the installation of AT&T and Verizon's equipment.

² Petition 1467 also included a detailed explanation as to why the proposed Facility is congruent with Stratford's local land use regulations and policies.

B. Overall Scheduling

Barrett would commence site preparation and engineering immediately following the Council's approval of a Development and Management (D&M) Plan. Barrett anticipates that it would take approximately twelve weeks to install the monopole structure as well as the carriers' antennas and associated equipment. Facility integration and system testing would likely require an additional two weeks after the completion of construction.

VIII. CONCLUSION

This Application and the appended attachments, as well as the voluminous record concerning Petition 1467, demonstrate that a public need exists for the proposed Facility and that the Facility would not have any substantial adverse environmental effects. A public need exists for improved and reliable wireless services in the areas proximate to the proposed Facility. The public need for the Facility far outweighs any potential environmental effects resulting from the construction, maintenance and operation of the Facility.

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

Respectfully submitted by,

BARRETT OUTDOOR COMMUNICATIONS, INC.

By:

Jesse A. Langer Updike, Kelly & Spellacy, P.C. One Century Tower 265 Church Street, 10th Floor New Haven, CT 06510 (203) 786-8310 Email: jlanger@uks.com

TAB

BARRETT OUTDOOR COMMUNICATIONS, INC.

"DOCK SHOPPING CENTER" WIRELESS COMMUNICATIONS FACILITY 200 EAST MAIN ST. REAR STRATFORD, CT 06614





VICINITY MAP

SCALE: 1" = 2,000

1 and	SP-1	SITE PLAN
5	C-1	PARTIAL SITE PLAN & ELEVATION
1	C-2	SECTION
e 10		

DRAWING INDEX

A1 TELECOMMUNICATIONS EASEMENT MAP (1 OF 2) A2 TELECOMMUNICATIONS EASEMENT MAP (2 OF 2)

T-1 TITLE SHEET & INDEX

R-1 ABUTTERS MAP

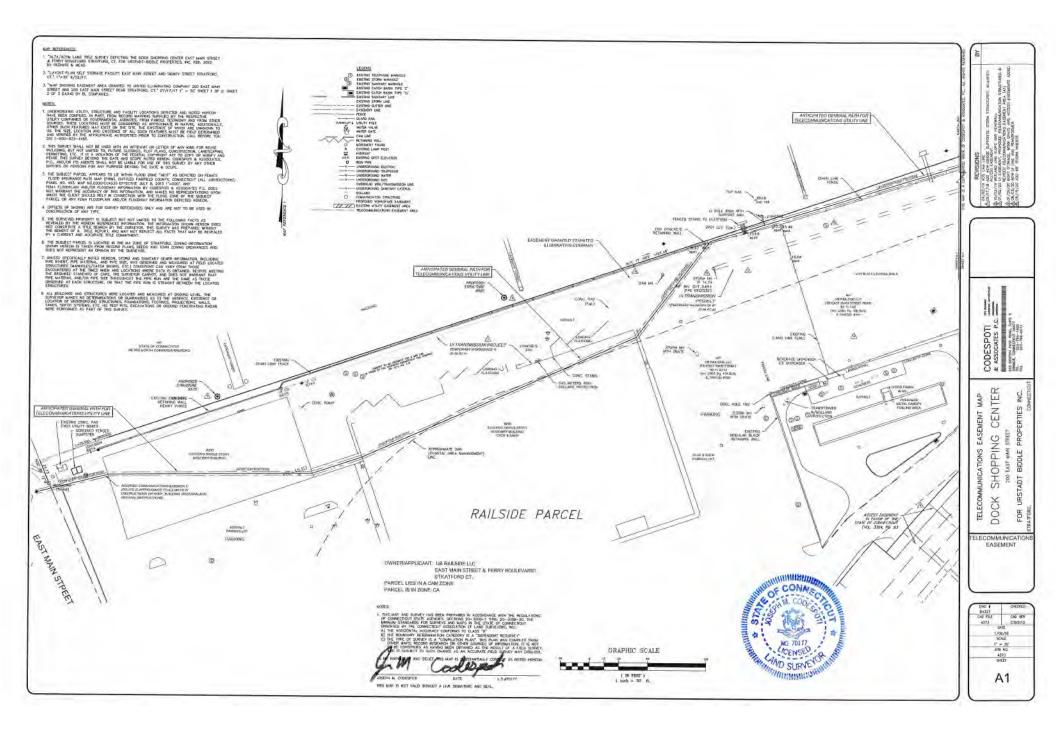
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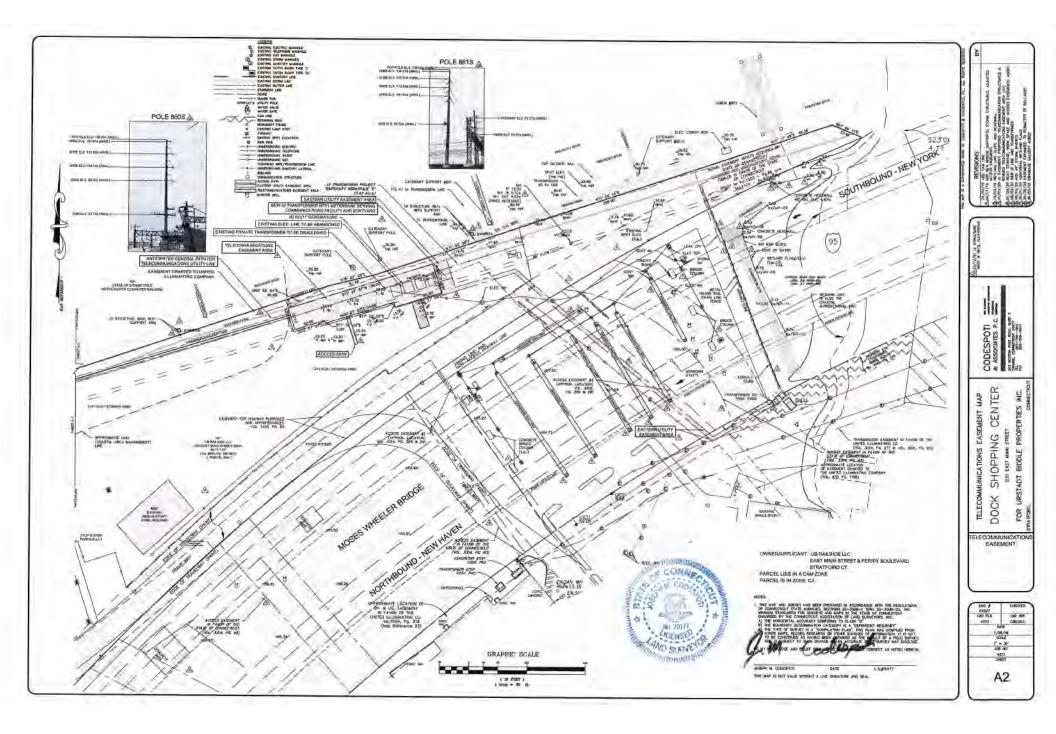
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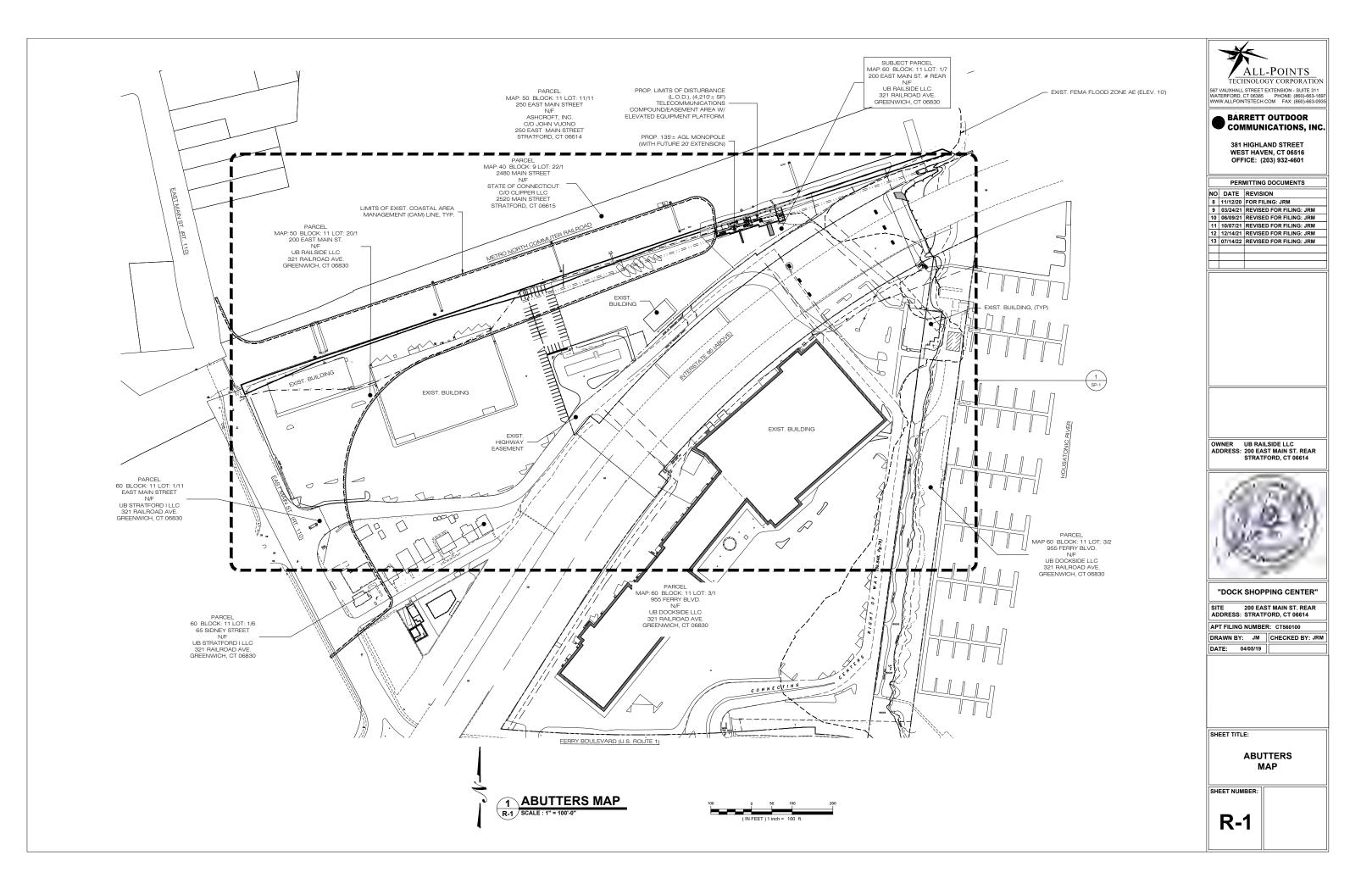
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	"DOCK SHOPPING CENTER" 200 EAST MAIN ST. REAR,				FORD, CT 06614	
SITE TYPE/DESCRIPTION: PROPERTY OWNER:	STRATFORD, CT 06614 INSTALLATION OF A 135'± AGL MONOPOLE (WITH FUTURE 20' EXTENSION) AND ELEVATED WIRELESS COMMUNICATIONS EQUIPMENT PLATFORM WITHIN 4,210'± SF COMPOUND/EASEMENT AREA. UB RAILSIDE LLC 321 RAILROAD AVE. GREENWICH, CT 06830 BARRETT OUTDOOR COMMUNICATIONS, INC.					
	381 HIGHLAND STREET WEST HAVEN, CT 06516	"DOCK SHOPPING CENTER"				
L/REGULATORY COUNSEL:	JESSE A. LANGER UPDIKE, KELLY & SPELLACY, P.C. ONE CENTURY TOWER 265 CHURCH STREET, 10th FLOOR NEW HAVEN, CT 06512=0 (203) 786-8317					
ENGINEERING CONTACT:	ALL-POINTS TECHNOLOGY CORPORATION, P.C. 567 VAUXHALL STREET EXTENSION - SUITE 311 WATERFORD, CT 06385 860 663-1697					
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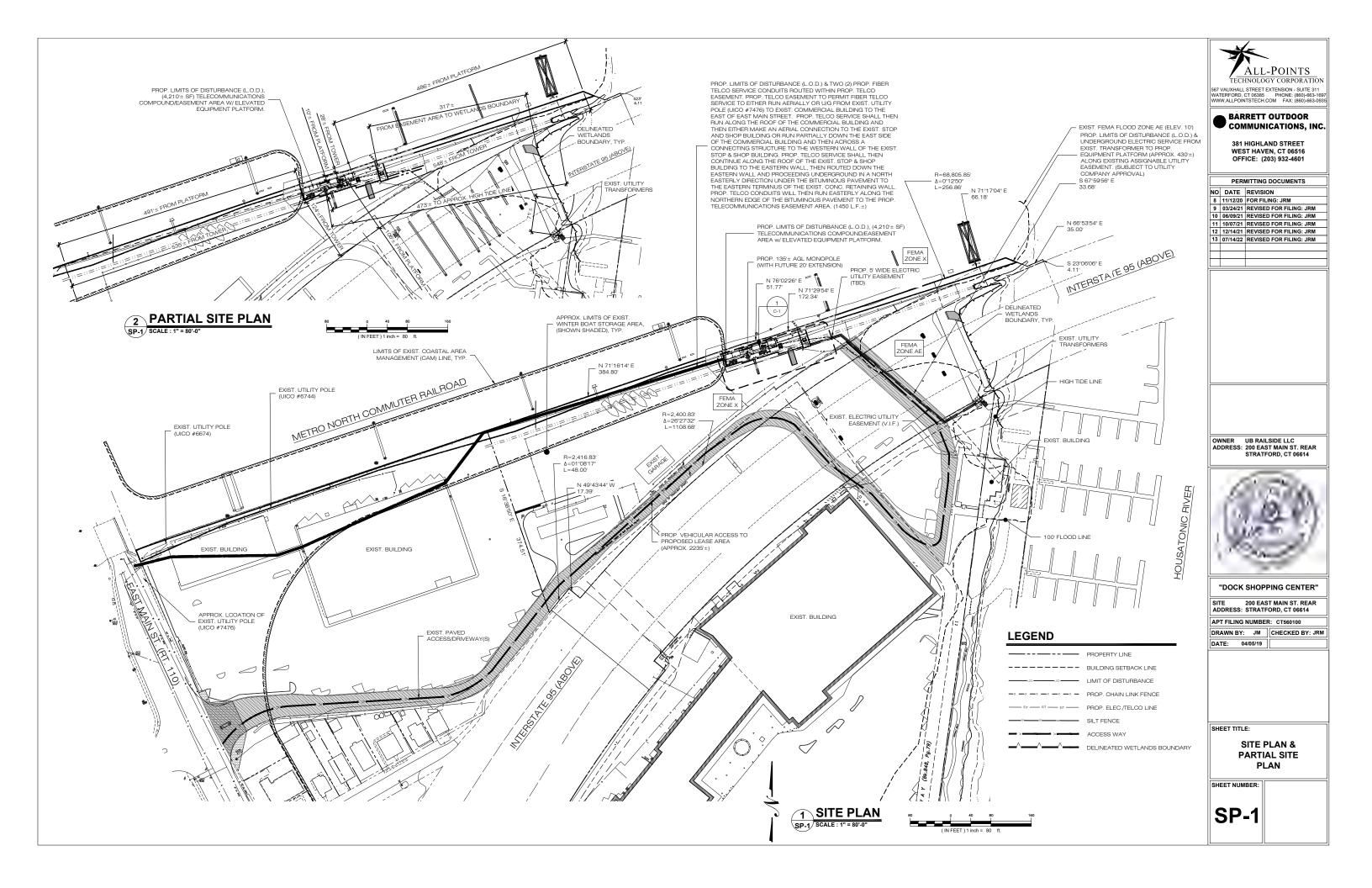
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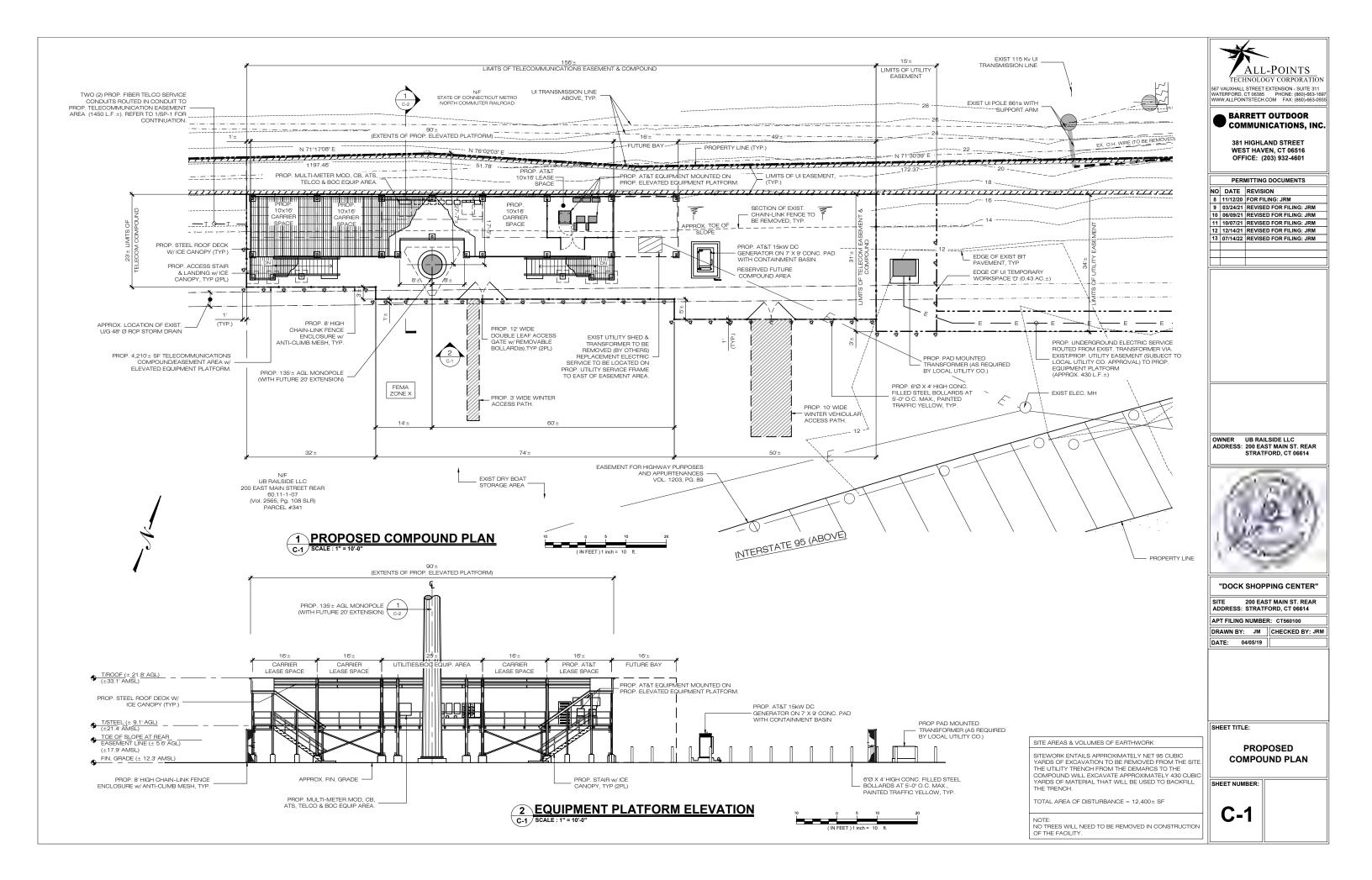
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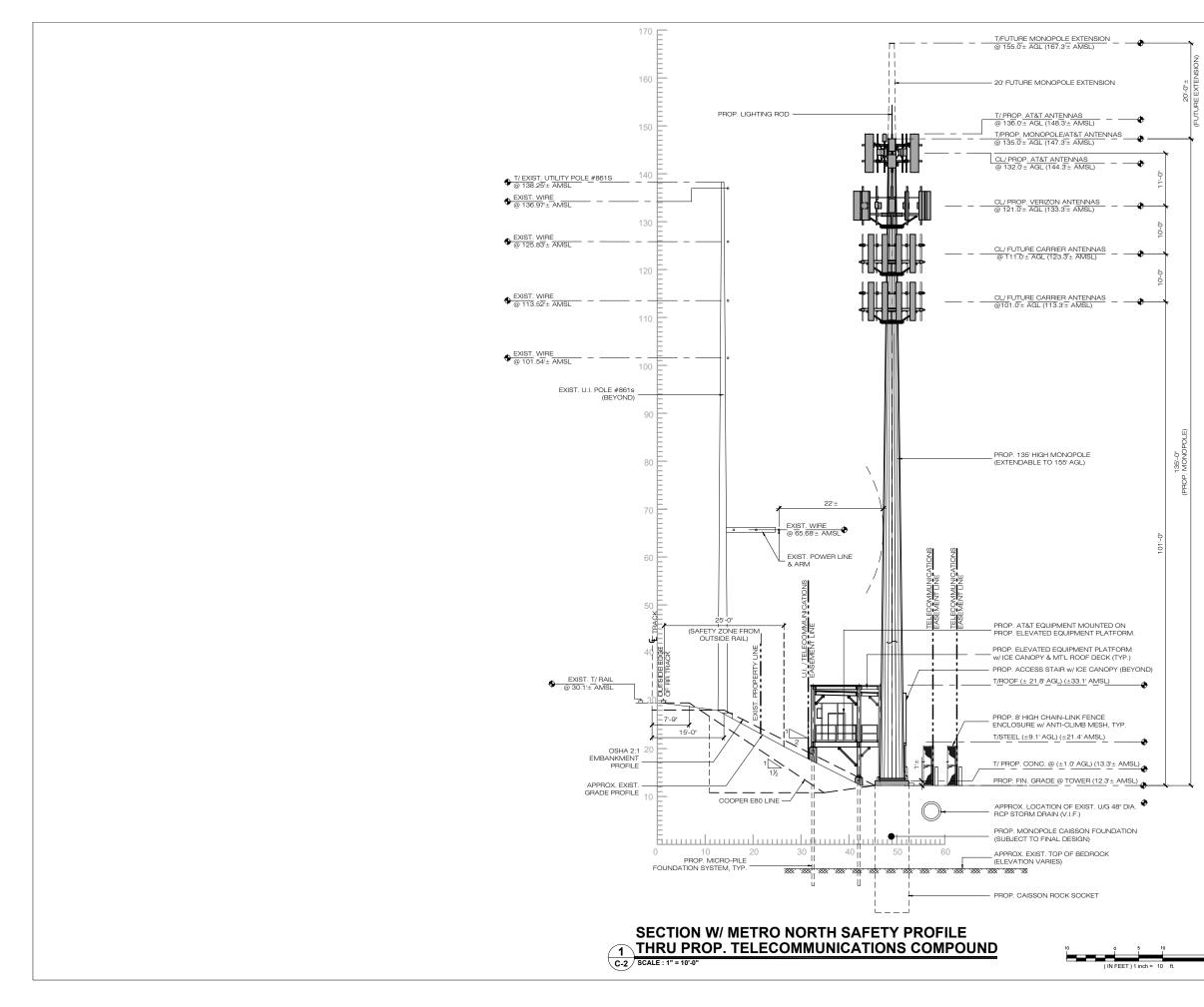




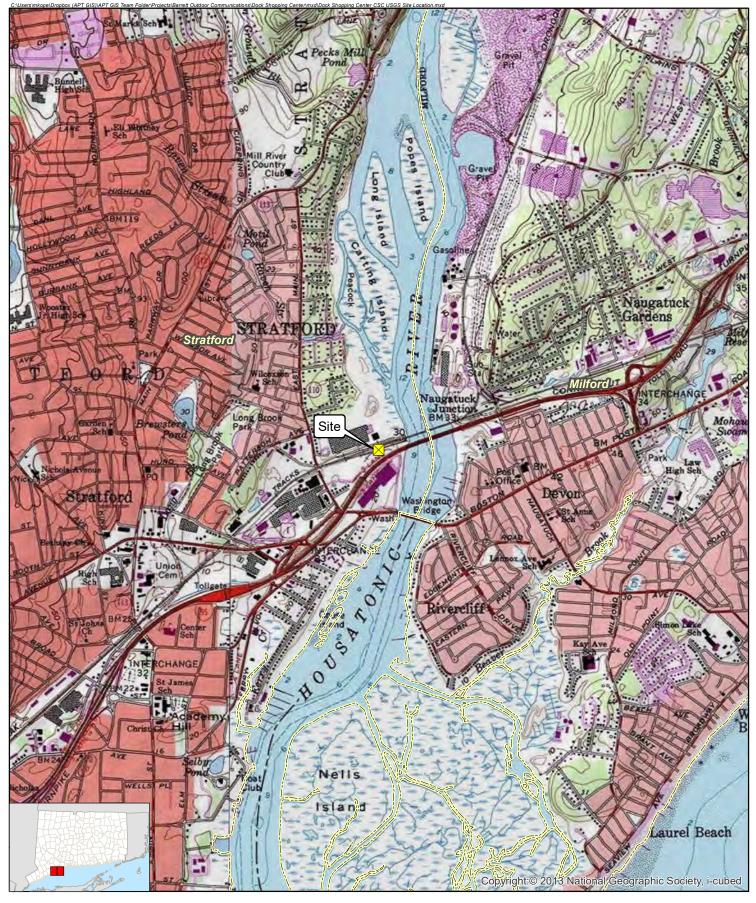








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500

1,000 Feet

Legend

Site

Municipal Boundary

<u>Map Notes:</u> Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps. Bridgeport, CT (1984) and Milford, CT (1984) Map Scale: 1:24,000 Map Date: May 2022

Site Location Map

Proposed Wireless Telecommunications Facility Dock Shopping Center 200 East Main Street, Rear Stratford, Connecticut





200

Legend



Approximate Parcel Boundary

Municipal Boundary

<u>Map Notes:</u> Base Map Source: CT ECO 2019 Imagery Map Scale: 1 inch = 400 feet Map Date: October 2021

Site Location Map

400 Feet

Proposed Wireless Telecommunications Facility Dock Shopping Center 200 East Main Street, Rear Stratford, Connecticut



Tab

CERTIFICATION OF SERVICE

I hereby certify that on the 22nd day of July, 2022, Barrett Outdoor Communication, Inc. provided notice of its Application for a Certificate of Environmental Compatibility And Public Need for the relocation of a wireless telecommunications facility from 28 Sidney Street Stratford, Connecticut to nearby 200 East Main Street, Rear, Stratford, Connecticut, to the following:

Town of Stratford

Town of Stratford Laura Hoydick, Mayor 2725 Main St Stratford, CT 06615	Town of Stratford Chief Administrative Officer Christopher Tymniak, CAO 2725 Main St Stratford, CT 06615
Town of Stratford	Town of Stratford
Planning Commission	Town Clerk
Jay Habansky, Planning and Zoning Administrator	Susan M. Pawluk, Town Clerk
2725 Main St	2725 Main St
Stratford, CT 06615	Stratford, CT 06615
Town of Stratford	Town of Stratford
Zoning Commission	Zoning Board of Appeals
Jay Habansky, Planning and Zoning Administrator	Jay Habansky, Planning & Zoning Administrator
2725 Main St	2725 Main St
Stratford, CT 06615	Stratford, CT 06615
Town of Stratford	Town of Stratford
Conservation Commission	Inland Wetlands and Watercourses Commission
Kelly Kerrigan, Environmental Superintendent	Kelly Kerrigan, Environmental Superintendent
2725 Main St	2725 Main St
Stratford, CT 06615	Stratford, CT 06615

City of Milford

City of Milford Benjamin Blake, Mayor 110 River St Milford, CT 06460

City of Milford Planning and Zoning Board David Sulkis, City Planner 70 West River St Milford, CT 06460 City of Milford Karen Fortunati, City Clerk 70 West River St Milford, CT 06460

City of Milford Zoning Board of Appeals Stephen Harris, Zoning Enforcement Officer 70 West River St Milford, CT 06460 City of Milford Inland Wetlands Agency MaryRose Palumbo, Inland Wetlands Officer 70 West River St Milford, CT 06460 City of Milford Conservation Commission Ryan Keeler, Chairman 70 West River St Milford, CT 06460

State and Regional

The Honorable William Tong Attorney General, State of Connecticut Office of the Attorney General 55 Elm Street Hartford, CT 06106

Connecticut Department of Public Health c/o Manisha Juthani, MD Commissioner 410 Capital Avenue Hartford, CT 06106

Connecticut Council on Environmental Quality c/o Susan D. Merrow, Chair 79 Elm Street Hartford, CT 06106

Connecticut Department of Energy & Environmental Protection c/o Katie Dykes, Commissioner 79 Elm Street Hartford, CT 06106

Connecticut Office of Policy and Management c/o Jeffrey Beckham, Secretary 450 Capitol Avenue Hartford, CT 06106

Connecticut Department of Economic and Community Development State Historic Preservation Office *c/o* Elizabeth Shapiro, Director 450 Columbus Boulevard, Suite 5 Hartford, CT 06103 Connecticut Department of Emergency Services and Public Protection Division of Emergency Management and Homeland Security *c/o* James C. Rovella, Commissioner 1111 Country Club Road Middletown, CT 06457

Connecticut Public Utilities Regulatory Authority c/o Marissa Gillett, Chairwoman Ten Franklin Square New Britain, CT 06051

Connecticut Department of Economic and Community Development c/o David Lehman, Commissioner 450 Columbus Boulevard, Suite 5 Hartford, CT 06103

Connecticut Department of Agriculture c/o Bryan P. Hurlburt, Commissioner 450 Columbus Boulevard, Suite 701 Hartford, CT 06103

Connecticut Department of Transportation c/o Joseph Giulietti, Commissioner 2800 Berlin Turnpike Newington, CT 06131

Connecticut Metropolitan Council of Governments c/o Matthew Fulda, Executive Director 1000 Lafayette Blvd., Ste. 925 Bridgeport, CT 06604 Kevin Kelly Connecticut State Senate; 21st District Legislative Office Building, Room 3400 300 Capitol Avenue Hartford, CT 06106

James Maroney Connecticut State Senator; 14th District Legislative Office Building, Room 2000 300 Capitol Avenue Hartford, CT 06106

Connecticut Department of Labor c/o Dante Bartolomeo, Commissioner 200 Folly Brook Boulevard Wethersfield, CT 06109

Connecticut Department of Consumer Protection c/o Michelle Seagull, Commissioner 450 Columbus Boulevard, Suite 901 Hartford, CT 06103 Phillip Young Connecticut State Representative; 120th District Legislative Office Building, Room 4000 300 Capitol Avenue Hartford, CT 06106

Frank Smith Connecticut State Representative; 118th District Legislative Office Building, Room 4000 300 Capitol Avenue Hartford, CT 06106

South Central Regional Council of Governments c/o Matthew Hoey, Chair 127 Washington Avenue, 4th Floor West North Haven, CT 06473

Connecticut Department of Administrative Services c/o Michelle Gilman, Commissioner 450 Columbus Boulevard Hartford, CT 06103

Federal

U.S. Department of Transportation Federal Aviation Administration *c/o* Steve Dickson, Administrator 800 Independence Avenue, SW Washington, DC 20591

U.S. Senator Christopher Murphy Colt Gateway, Suite 401 120 Huyshope Avenue Hartford, CT 06106

Federal Communications Commission c/o Jessica Rosenworcel Chairwoman 45 L Street NE Washington, DC 20554 U.S. Representative Rosa DeLauro Connecticut 3rd District 101 Water Street, Suite 301 Norwich, CT 06360

U.S. Senator Richard Blumenthal 90 State House Square, 10th Floor Hartford, CT 06103 Respectfully submitted by,

4. M Oh

Jesse A. Langer



July 22, 2022

VIA CERTIFIED MAIL

Town of Stratford Laura R. Hoydick, Mayor 2725 Main St Stratford, CT 06615

RE: Proposed relocation of a wireless telecommunications facility currently located at 28 Sidney Street, Stratford to 200 East Main Street, Rear, Stratford

The Honorable Laura Hoydick:

I write on behalf of Barrett Outdoor Communications ("Barrett"). Barrett intends to file with the Connecticut Siting Council ("Council") an Application for a Certificate of Environmental Compatibility and Public Need ("Application").

Barrett proposes to construct a wireless telecommunications facility ("Facility") on real property commonly known as 200 East Main Street, Rear, Stratford, Connecticut ("Property"). The proposed Facility would be located in the northern portion of the Property. The Facility would consist of a monopole with a height of 135 feet above grade level, with a lightning rod on top, and associated ground equipment within a 4,210 square foot fenced compound. The monopole would host the antenna arrays of several wireless providers. Access to the proposed Facility would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer.

This letter serves as notice to you as an "appropriate municipal official and government agenc[y]" as that term is defined under § 16-50j-40 of the Regulations of Connecticut State Agencies. Barrett will file the Application on or about July 22, 2022 and will request that the Council place the Application on some future agenda.

Attached please find a copy of the Application. If you have any questions or concerns regarding this matter, please contact the undersigned at (203) 786-8317, or the Council at (860) 827-2935.

Very truly yours,

Jesse A. Langer

Enclosure



July 22, 2022

VIA CERTIFIED MAIL

City of Milford Benjamin Blake, Mayor 110 River St Milford, CT 06460

RE: Proposed relocation of a wireless telecommunications facility currently located at 28 Sidney Street, Stratford to 200 East Main Street, Rear, Stratford

The Honorable Benjamin Blake:

I write on behalf of Barrett Outdoor Communications ("Barrett"). Barrett intends to file with the Connecticut Siting Council ("Council") an Application for a Certificate of Environmental Compatibility and Public Need ("Application").

Barrett proposes to construct a wireless telecommunications facility ("Facility") on real property commonly known as 200 East Main Street, Rear, Stratford, Connecticut ("Property"). The proposed Facility would be located in the northern portion of the Property. The Facility would consist of a monopole with a height of 135 feet above grade level, with a lightning rod on top, and associated ground equipment within a 4,210 square foot fenced compound. The monopole would host the antenna arrays of several wireless providers. Access to the proposed Facility would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer.

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Very truly yours,

Jesse A. Langer

Enclosure

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Abutters

UB Dockside LLC 321 Railroad Avenue Greenwich, CT 06830

State of Connecticut c/o Clipper LLC 2520 Main Street Stratford, CT 06615

UB Stratford I LLC 321 Railroad Avenue Greenwich, CT 06830

UB Stratford I LLC 321 Railroad Avenue Greenwich, CT 06830 Ashcroft, Inc. c/o John Vuono 250 East Main Street Stratford, CT 06614

UB Railside LLC 321 Railroad Avenue Greenwich, CT 06830

UB Stratford I LLC 321 Railroad Avenue Greenwich, CT 06830

UB Dockside LLC 321 Railroad Avenue Greenwich, CT 06830

Owner / Applicant

Barrett Outdoor Communications, Inc. 381 Highland Street West Haven, CT 06516 UB Railside LLC 321 Railroad Avenue Greenwich, CT 06830

Respectfully submitted by,

Jesse A. Langer



July 22, 2022

VIA CERTIFIED MAIL

UB Dockside LLC 321 Railroad Avenue Greenwich, CT 06830

RE: Proposed relocation of wireless telecommunications facility from 28 Sidney Street, Stratford, to nearby 200 East Main Street, Rear, Stratford.

To Whom It May Concern:

I write on behalf of Barrett Outdoor Communications ("Barrett"). Barrett intends to file with the Connecticut Siting Council ("Council") an Application for a Certificate of Environmental Compatibility and Public Need ("Application").

Barrett proposes to construct a wireless telecommunications facility ("Facility") on real property commonly known as 200 East Main Street, Rear, Stratford, Connecticut ("Property"). The proposed Facility would be located in the northern portion of the Property. The Facility would consist of a monopole with a height of 135 feet above grade level, with a lightning rod on top, and associated ground equipment within a 4,210 square foot fenced compound. The monopole would host the antenna arrays of several wireless providers. Access to the proposed Facility would be across an existing bituminous drive. A fiber optic cable run would extend from East Main Street, with a proposed electric line extending to an existing United Illuminating transformer.

This letter serves as notice to you as an abutting property owner pursuant to § 16-50j-40 of the Regulations of Connecticut State Agencies. Barrett will file the Petition on or about July 22, 2022, and will request that the Council place the Petition on some future agenda.

You may review the Petition at the office of the Council, which is located at Ten Franklin Square, New Britain, Connecticut, 06051, or at the Office of the Town Clerk at the Stratford Town Hall. If you have any questions or concerns regarding this matter, please contact the undersigned at (203) 786-8317, or the Council at (860) 827-2935.

Very truly yours,

Jesse A. Langer

Tab

Radio Frequency Analysis Report

CT1848 200 East Main Street, Stratford, CT



June 23, 2022



C Squared Systems, LLC 65 Dartmouth Drive, A3 Auburn, NH 03032

Phone: (603) 644-2800 Fax: (603) 644-2801 Support@csquaredsystems.com

Table of Contents

1.	Overview	1
2.	Technology Advances & Design Evolution	1
3.	Coverage Objective	2
4.	Conclusion	5
5.	Statement of Certification	5
6.	Attachments	6

List of Tables

Table 1. Correge Statistics	1
Table 1: Coverage Statistics	

List of Attachments

Attachment 1: CT1848 - Area Terrain Map	6
Attachment 2: CT1848 - Neighbor Site Data	8
Attachment 3: CT1848 - Existing 700 MHz LTE Coverage for the Current AT&T Network	9
Attachment 4: CT1848 - Existing 700 MHz LTE Coverage with Proposed Site for the AT&T Network	10
Attachment 5: Connecticut DOT Average Annual Daily Traffic Data – CT1848	11

1. Overview

C Squared Systems was retained by New Cingular Wireless PCS, LLC ("AT&T") to evaluate the proposed wireless communications facility at 200 East Main Street in Stratford to allow AT&T to install its antennas at 132 feet AGL.

AT&T is licensed by the FCC to provide wireless communications services throughout the State of Connecticut including the Town of Stratford where the proposed facility would be located.

This report addresses AT&T's need for the proposed wireless facility and confirms that there are no other suitable existing structures available that could address the coverage gaps in their wireless communications network.

The coverage analysis completed by C Squared Systems confirms: AT&T has a gap in reliable service in Stratford, and that the Proposed Facility provides AT&T with coverage in that service gap. Included as attachments in this report are coverage, terrain and network layout maps.

2. Technology Advances & Design Evolution

AT&T provides digital voice and data services using advanced 4th Generation (4G) services over LTE technology in the 700 MHz, 850 MHz, 1900 MHz, 2100 MHz and 2300 MHz frequency bands as allocated by the FCC. 5th Generation (5G) services are also being selectively rolled out on available frequencies in the 850 MHz, 1900 MHz, 2100 MHz and 2300 MHz bands. These data networks are used by mobile devices for fast web browsing, media streaming, and other applications that require broadband connections. The mobile devices that benefit from these advanced data networks are not limited to basic handheld phones, but also include devices such as smartphones, PDA's, tablets, and laptop air-cards. 4G LTE services and devices have enabled AT&T customers to have even faster connections to people, information, and entertainment.

AT&T will also deploy FirstNet services from this facility. FirstNet is a federal agency with a mandate to create a nationwide, interoperable public safety broadband network for first responders. First responders across the country currently rely on more than 10,000 separate radio networks which oftentimes do not interoperate with one another. By deploying a nationwide broadband public safety network built specifically to meet the communications needs of first responders, the FirstNet network will provide a solution to the decades-long interoperability and communications challenges first responders have experienced, and which was highlighted by the 9/11 Commission's 2004 Final Report.

FirstNet selected AT&T to build, manage and operate the National Public Safety Broadband Network ("NPSBN") using FirstNet's Band 14 spectrum (Call Sign WQQE234, 20 MHz of the 700 MHz spectrum), together with AT&T's own wireless network. Using a combination of new and existing wireless facilities, AT&T provides prioritized, preemptive wireless services for first responders across Connecticut, New England and nationwide, while also improving 4G LTE coverage for AT&T customers.

AT&T's 4G LTE technology is designed to thresholds of -83 dBm and -93 dBm for their 700 MHz LTE and -86 dBm and -96 dBm for their 1900 MHz LTE.¹ The stronger thresholds (-83 dBm and -86 dBm) yield greater throughputs and improved customer experience. The -93 dBm and -96 dBm thresholds are the minimum acceptable levels required to meet customer expectations for 4G service.

¹ The threshold range differences between the 700 MHz and 1900 MHz frequency bands directly correlates to the type of branch diversity receivers deployed in AT&T's receiver design.

3. Coverage Objective

There is a significant coverage deficiency in the existing AT&T wireless communications network along I-95 as well as other roads in the area and in the vicinity of the proposed location, referred to herein as the "targeted 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. Seamless reliable coverage provides users with the ability to successfully originate, receive, and maintain quality calls and data applications throughout a service area. Appropriate overlapping coverage is required for users to be able to move throughout the service area and reliably "hand-off" between cells to maintain uninterrupted connections.

Due to terrain characteristics and the distance between the targeted area and the existing sites, AT&T's options to provide services in this area are quite limited (maps of the terrain in this area and the distance to neighboring AT&T sites from the proposed site are included as Attachments 1 & 2, respectively.). AT&T's network requires deployment of antennas throughout the area to be covered. These antennas are connected to receivers and transmitters that operate in a limited geographic area known as a "cell." AT&T's wireless network, including their wireless handsets and devices, operate by transmitting and receiving low power radio frequency signals to and from these cell sites. The signals are transferred to and from the landline telephone network and routed to their destinations by sophisticated electronic equipment. The size of the area served by each cell site is dependent on several factors, including the number of antennas used, the height at which the antennas are deployed, the topography of the land, vegetative cover and natural or man-made obstructions in the area. As customers move throughout the service area, the transmission from the portable devices is automatically transferred to the AT&T facility with the best connection to the device, without interruption in service provided that there is overlapping coverage from the cells.

In order to define the extent of the coverage gap to be filled, propagation modeling has been conducted in the area of Stratford. Propagation modeling uses PC software to determine the network coverage based on the specific technical parameters of each site including, but not limited to, location, ground elevation, antenna models, antenna heights, and also databases of terrain and ground cover in the area. Drive testing consists of traveling along area roadways in a vehicle equipped with a sophisticated setup of test devices and receivers that collect a variety of network performance metrics. The data are then processed and mapped in conjunction with the propagation modeling to determine the coverage gaps.

Analysis of the propagation modeling and drive testing in Stratford reveal that AT&T's network is unreliable throughout much of the area due to gaps in coverage, and that there is a service deficiency as a result. In order to fill in these coverage gaps and improve the network reliability to Stratford, a new facility is needed in the area.

Included in this report are Attachments 1 through 5, which are explained below to help describe AT&T's 4G network deployment in and around Stratford, and the need for the proposed facility.

- Attachment 1: "*CT1848 Area Terrain Map*" details the terrain features around the area of deficient service being targeted by the proposed site in Stratford. These terrain features play a key role in determining site designs and dictating the unique coverage achieved from a given location. This map is included to provide a visual representation of the ridges and valleys that must be considered when siting a wireless facility. The blue, green, and yellow shades correspond to lower elevations, whereas the orange and red shades indicate higher elevations.
- Attachment 2: "*CT1848 Neighbor Site Data*" provides site specific information of existing neighboring sites used to perform the coverage analysis provided in Attachments 3 and 4.
- Attachment 3: "*CT1848 Existing 700 MHz LTE Coverage*" for the Current AT&T Network depicts 700 MHz LTE coverage from existing sites and demonstrates that there are currently gaps in 700 MHz LTE coverage effecting service within the targeted area. The coverage shown is where the signal strengths are: > -83 dBm (minimum level required reliable, high quality service and performance at 700 MHz) and, > -93 dBm (minimum required for adequate level of service at 700 MHz). In an effort to provide the required levels of coverage to these areas, AT&T is proposing to install a wireless facility at the East Main Street location.
- Attachment 4: "*CT1848 Existing 700 MHz LTE Coverage with Proposed Site*" shows how this proposed site would fill in the existing coverage gaps and improve AT&T's 700 MHz LTE network.
- Attachment 5: *"Connecticut DOT Average Annual Daily Traffic Data CT1848"* shows the available vehicular traffic volume data for the subject area from the Connecticut Department of Transportation. These data show as many as 88,400 vehicles per day passing through I-95 in the vicinity of the proposed facility.

Table 1 below lists the coverage statistics compiled for the AT&T's 700 MHz 4G LTE network with the deployment of the Proposed Site.

	Incremental Coverage from Proposed Site (700 MHz)		
B opulation ²	(≥ -83 dBm)	4484	
Population: ²	(≥ -93 dBm)	4688	
Business Pops: ³	(≥ -83 dBm)	1835	
	(≥ -93 dBm)	1855	
	(≥ -83 dBm)	1.42	
Area (mi²):	(≥ -93 dBm)	1.36	
	Main (-93 dBm):	3.4	
Roadway (mi):	Secondary (-93 dBm):	15.4	
	Total (-93 dBm):	18.8	

Table 1: Coverage Statistics

² Population figures are based upon 2010 US Census Block Data

³ Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

4. Conclusion

AT&T has identified an area of deficient coverage affecting a significant portion of Stratford, CT including key traffic corridors through the residential and business/retail areas of the Town. The proposed facility will bring the needed fillin coverage to significant portions of I-95 as well as other roads in the area and to the vicinity of the proposed location.

No other existing structures were identified and available that would be able to satisfy the coverage requirements needed for this area.

5. Statement of Certification

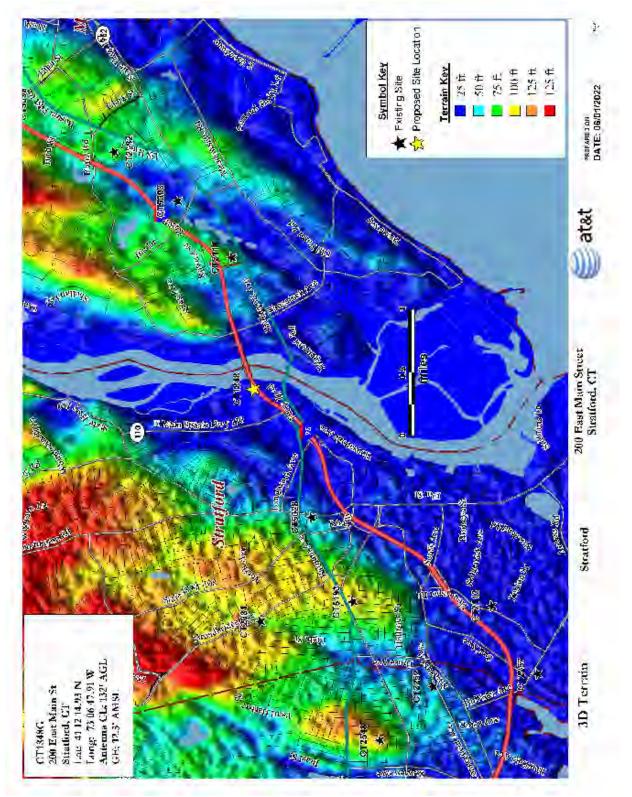
I certify to the best of my knowledge that the statements in this report are true and accurate.

Martof Fand

June 23, 2022

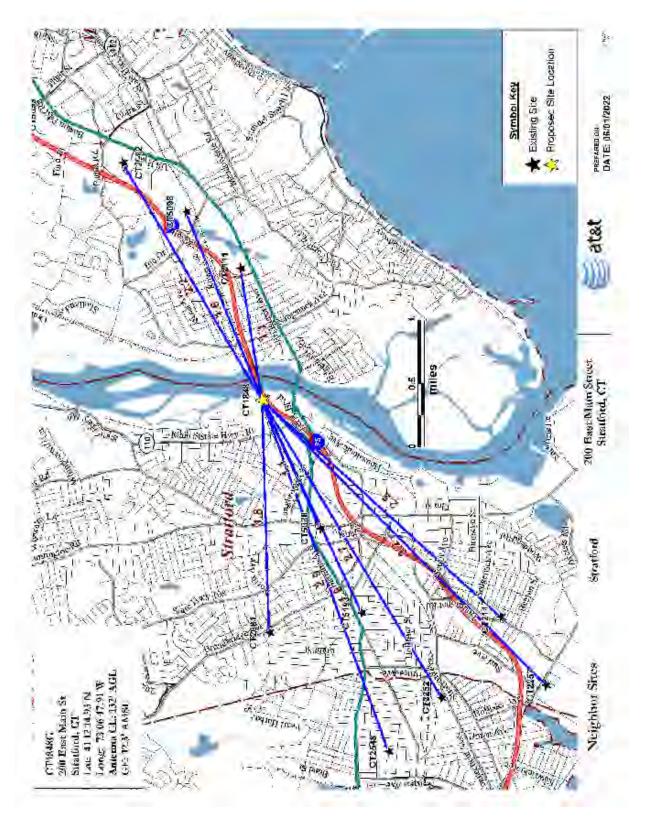
Martin J. Lavin C Squared Systems, LLC Date

6. Attachments

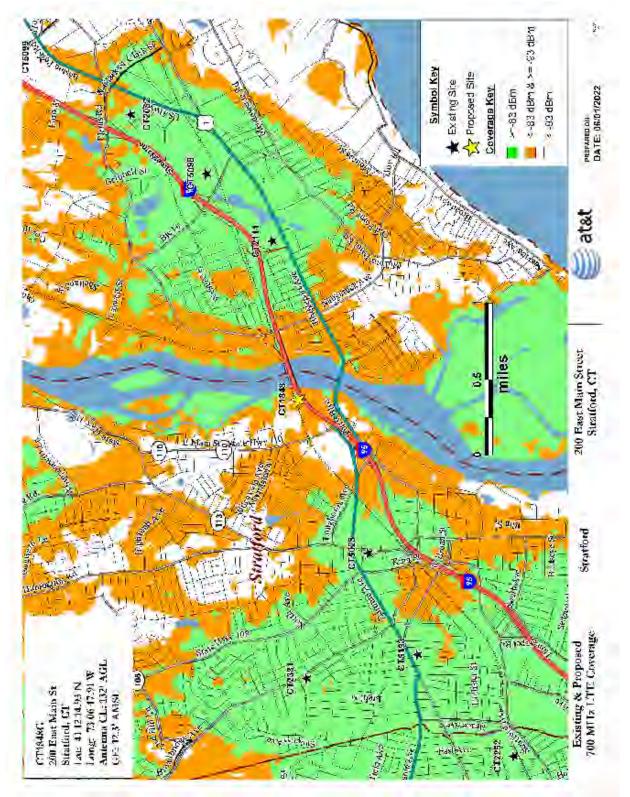


Attachment 1: CT1848 - Area Terrain Map

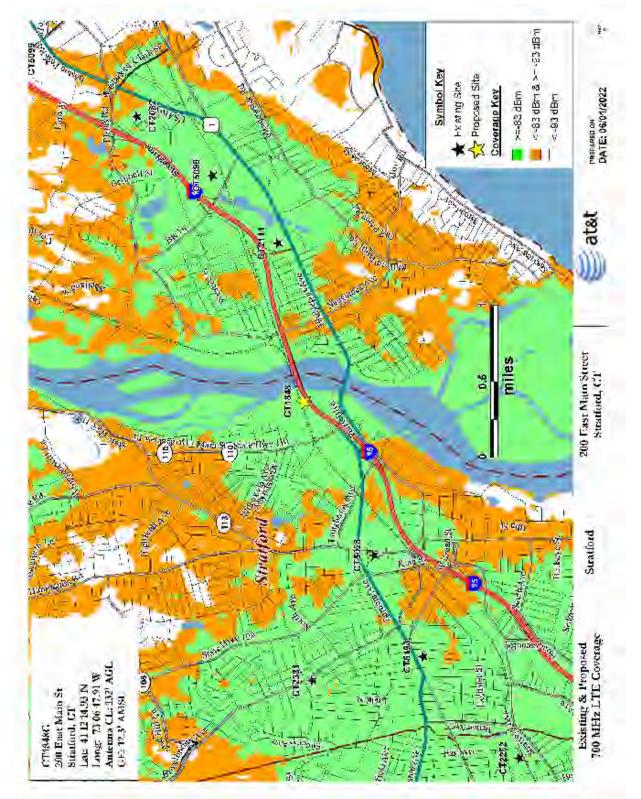
Site Name	Address	City	Latitude	Longitude	Antenna Height (ft AGL)	Ground Elevation	Distance (miles)
CT2082	Bona Street	Milford	41.2201	-73.0774	136	62	2.2
CT2111	438 Bridgeport Avenue	Milford	41.2066	-73.0934	103	52	1.1
CT2112	623 Honeyspot Road	Stratford	41.1769	-73.1462	92	7	2.5
CT2252	1069 Connecticut Avenue	Bridgeport	41.1836	-73.1584	107	23	2.7
CT2257	225 Lordship Boulevard	Stratford	41.1717	-73.1565	63	7	3.2
CT2381	23 Stonybrook Road	Stratford	41.2033	-73.1486	109/117	75	1.8
CT2548	267 Grant Street	Bridgeport	41.1897	-73.1666	142	85	2.9
CT5028	2725 Main Street	Stratford	41.1975	-73.1328	73	36	1.1
CT5098	111 School House Road	Milford	41.2129	-73.0849	125	43	1.6
CT5193	1825 Barnum Avenue	Stratford	41.19278	-73.145551	43	95	1.8



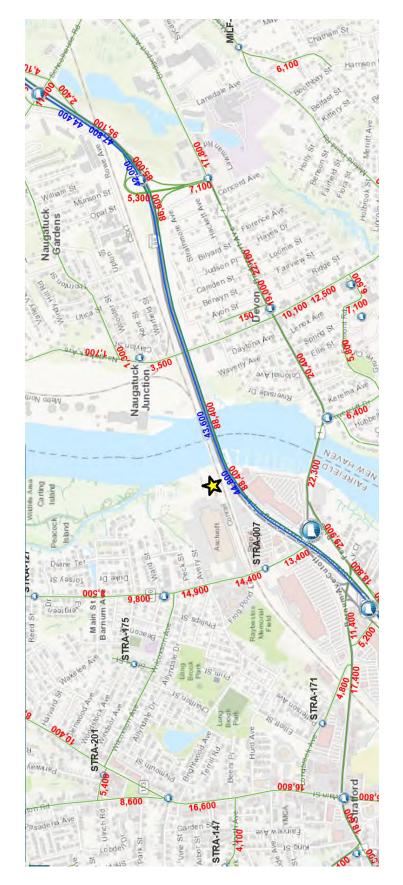
Attachment 2: CT1848 - Neighbor Site Data



Attachment 3: CT1848 - Existing 700 MHz LTE Coverage for the Current AT&T Network



Attachment 4: CT1848 - Existing 700 MHz LTE Coverage with Proposed Site for the AT&T Network



Attachment 5: Connecticut DOT Average Annual Daily Traffic Data - CT1848

Tab

From:	Jennifer Young Gaudet <jyounggaudet@allpointstech.com></jyounggaudet@allpointstech.com>
Sent:	Thursday, February 24, 2022 10:29 AM
То:	Jesse A. Langer
Cc:	John E. Barrett; Chuck Regulbuto (chuck@northeastsitesolutions.com); Brian Gaudet; Jason Mead
Subject:	FW: Status of FAA Filing 2020-ANE-4904-OE

Please see below for FAA approval of the requested extension.

JENNIFER YOUNG GAUDET PROGRAM MANAGER

M 860.798.7454 All-Points Technology Corporation

------ Forwarded message ------From: <<u>noreply@faa.gov</u>> Date: Thu, Feb 24, 2022 at 10:00 AM Subject: Status of FAA Filing 2020-ANE-4904-OE To: <<u>jebarrett@barrettoutdoor.com</u>>, <<u>mkoperwhats@integratedwirelessllc.com</u>>

Your filing is assigned Aeronautical Study Number 2020-ANE-4904-OE.

The FAA has considered your request for an extension and it has been granted. Please review the letter and adhere to all conditions. If you require additional assistance, please contact Natalie Schmalbeck via phone: (816) 329-2525 or email: natalie.schmalbeck@faa.gov. Please refer to the assigned ASN on all future inquiries regarding this filing.

To review your electronic record, go to our website <u>oeaaa.faa.gov</u> and select the Search Archives link to locate your case using the Aeronautical Study Number (ASN). Copies of your letter are available on the website for your convenience.

To ensure e-mail notifications are delivered to your inbox please add <u>noreply@faa.gov</u> to your address book. Notifications sent from this address are system generated FAA e-mails and replies to this address will NOT be read or forwarded for review. Each system generated e-mail will contain specific FAA contact information in the text of the message.

--

Integrated Wireless Consulting, LLC Taylors, SC M: 203.687.6880

Tab

Visual Assessment & Photo-Simulations





Prepared in July 2022 by: All-Points Technology Corporation, P.C. 567 Vauxhall Street Extension – Suite 311 Waterford, CT 06385

Prepared for Barrett Outdoor Communications, Inc.



VISUAL ASSESSMENT & PHOTO-SIMULATIONS

Barrett Outdoor Communications, Inc. ("Barrett") is seeking approval for the development of a relocated wireless communications facility (the "Facility") at 200 East Main Street, Rear in Stratford, Connecticut (the "Host Property"). At the request of Barrett, All-Points Technology Corporation, P.C. ("APT") completed this assessment to evaluate the potential visual effects of the proposed Facility from within a 2-mile radius (the "Study Area"). The Study Area includes portions of the neighboring municipality of Milford to the east. Interstate 95 ("I-95") bisects the Study Area in an east-west direction. The Housatonic River bisects the Study Area in a north-south direction.

Project Setting

The Host Property consists of a ± 4.37 -acre parcel located east of East Main Street, south of the Metro North rail line, north of I-95, and west of the Housatonic River. It is a cleared, primarily undeveloped parcel used as a boat storage yard associated with the Boardwalk Marina. Commercial development and the auto and rail transportation corridors dominate the surrounding area. Residential development is located to the north, northwest, and southwest beyond the commercial developments.

The topography within the Study Area consists of relatively level terrain. Ground elevations range from sea level in the southern portion of the Study Area along the Long Island Sound shoreline to approximately 160 feet above mean sea level ("AMSL") in its northwestern portion. Tree cover within the Study Area (consisting primarily of mixed deciduous hardwoods) occupies approximately 1,599 acres (or $\pm 19.88\%$) of the 8,042-acre Study Area. Open water over Long Island Sound and the Housatonic River occupies approximately 927 acres ($\pm 11.53\%$) of the Study Area.

Project Undertaking

Barrett plans to construct the proposed Facility on the north central portion of the Host Property (the "Site"). The proposed Facility would be located at a ground elevation of approximately 12.3 feet AMSL and include a 135-foot tall monopole with antennas extending to a height of 136' above ground level ("AGL") and associated ground equipment on a raised steel platform within an irregularly shaped \pm 4,210-square foot fenced compound. Access to the Site would be gained over the existing paved driveway and parking lot associated with the boatyard. Please refer to the current Site Drawings prepared by APT, dated July 14, 2022, and provided under separate cover, for details regarding the proposed installation.

Methodology

APT used the combination of a predictive computer model, in-field analysis, and a review of various data sources to evaluate the visibility associated with the proposed Facility on both a quantitative and qualitative basis. The predictive model provides a measurable assessment of visibility throughout the entire Area, including private properties and other areas inaccessible for direct observations. The in-field analyses consisted of a crane test and field reconnaissance of the Study Area to record existing conditions, verify results of the model, inventory seasonal and year-round view locations, and provide photographic documentation from publicly accessible areas. A description of the procedures used in the analysis is provided below.

Preliminary Computer Modeling

To conduct this assessment, a predictive computer model was developed specifically for this project using ESRI's ArcMap GIS¹ software and available GIS data. The predictive model incorporates Project and Study Area-specific data, including the Site location, its ground elevation and the proposed Facility height, as well as the surrounding topography, existing vegetation, and structures (the primary features that can block direct lines of sight).

A digital surface model ("DSM"), capturing both the natural and built features on the Earth's surface, was generated for the extent of the Study Area utilizing State of Connecticut 2016 LiDAR² LAS³ data points. LiDAR is a remote-sensing technology that develops elevation data by measuring the time it takes for laser light to return from the surface to the instrument's sensors. The varying reflectivity of objects also means that the "returns" can be classified based on the characteristics of the reflected light, normally into categories such as "bare earth," "vegetation," "road," "surface water" or "building." Derived from the 2016 LiDAR data, the LAS datasets contain the corresponding elevation point data and return classification values. The Study Area DSM incorporates the first return LAS dataset values that are associated with the highest feature in the landscape, typically a treetop, top of a building, and/or the highest point of other tall structures.

Once the DSM was generated, ESRI's Viewshed Tool was utilized to identify locations within the Study Area where the proposed Facility may be visible. ESRI's Viewshed Tool predicts visibility by identifying those cells⁴ within the DSM that can be seen from an observer location. Cells where visibility was indicated were extracted and converted from a raster dataset to a polygon feature which was then overlaid onto aerial photograph and topographic base maps. Since the

¹ ArcMap is a Geographic Information System desktop application developed by the Environmental Systems Research Institute for creating maps, performing spatial analysis, and managing geographic data.

² Light Detection and Ranging

³ An LAS file is an industry-standard binary format for storing airborne LiDAR data.

⁴ Each DSM cell size is 1 square meter.

DSM includes the highest relative feature in the landscape, isolated "visible" cells are often indicated within heavily forested areas (e.g., from the top of the highest tree) or on building rooftops during the initial processing. It is recognized that these areas do not represent typical viewer locations and overstate visibility. As such, the resulting polygon feature is further refined by extracting those areas. The viewshed results are also cross-checked against the most current aerial photographs to assess whether significant changes (a new housing development, for example) have occurred since the time the LiDAR-based LAS datasets were captured.

The results of the preliminary analysis are intended to provide a representation of those areas where portions of the Facility may potentially be visible to the human eye without the aid of magnification, based on a viewer eye-height of five (5) feet above the ground and the combination of intervening topography, trees and other vegetation, and structures. However, the Facility may not necessarily be visible from all locations within those areas identified by the predictive model, which has its limitations. For instance, the computer model cannot account for mass density, tree diameters and branching variability of trees, or the degradation of views that occurs with distance. As a result, some areas depicted on the viewshed maps as theoretically offering potential visibility of the Facility may be over-predictive because the quality of those views is not sufficient for the human eye to recognize the Facility or discriminate it from other surrounding or intervening objects.

Seasonal Visibility

Visibility also varies seasonally with increased, albeit obstructed, views occurring during "leafoff" conditions. Beyond the variabilities associated with density of woodland stands found within any given Study Area, each individual tree also has its own unique trunk, pole timber and branching patterns that provide varying degrees of screening in leafless conditions which, as introduced above, cannot be precisely modeled. Seasonal visibility is therefore estimated based on a combination of factors including the type, size, and density of trees within a given area; topographic constraints; and other visual obstructions that may be present. Taking into account these considerations, areas depicting seasonal visibility on the viewshed maps are intended to represent locations from where there is a potential for views through intervening trees, as opposed to indicating that leaf-off views will exist from within an entire seasonally-shaded area.

Crane Test and Field Reconnaissance

To supplement and fine tune the results of the computer modeling efforts, APT completed infield verification activities consisting of a crane test, vehicular and pedestrian reconnaissance, and photo-documentation. The crane test and field reconnaissance were completed on March 23, 2021. The field activities consisted of positioning a crane at the proposed Facility location and extending the crane boom with a brightly-colored flag to a height of ± 135 feet AGL. This provided a fixed object unaffected by the wind. Weather conditions were favorable for the infield activities with mostly clear skies.

APT conducted a Study Area reconnaissance by driving along local and State roads and other publicly accessible locations to document and inventory where the flag could be seen above and through the tree canopy and other visual obstructions. Visual observations from the reconnaissance were also used to evaluate the results of the preliminary visibility mapping and identify any discrepancies in the initial modeling.

Photographic Documentation and Simulations

During the Study Area reconnaissance, APT obtained photo-documentation of representative locations where the crane boom and flag were – and were not - visible. At each photo location, the geographic coordinates of the camera's position were logged using global positioning system ("GPS") technology. Photographs were taken with a Canon EOS 6D digital camera body⁵ and Canon EF 24 to 105 millimeter ("mm") zoom lens. APT typically uses a standard focal length of 50mm to present a consistent field of view. On occasion, photos are taken at lower focal lengths to provide a greater depth of field and to provide context to the scene by including surrounding features within the photograph. During this evaluation, two (2) photographs were taken at a 24mm focal length and four (4) photographs were taken at a 35mm focal length as noted in Table 1 – Photo Locations.

Photographic simulations were generated to portray scaled renderings of the proposed Facility from 22 locations presented herein where the Facility may be recognizable above or through the trees. Using field data, site plan information and 3-dimensional (3D) modeling software, spatially referenced models of the Site and Facility were generated and merged. The geographic coordinates obtained in the field for the photograph locations were incorporated into the model to produce virtual camera positions within the spatial 3D model. Photo-simulations were then created using a combination of renderings generated in the 3D model and photo-rendering software programs, which were ultimately composited and merged with the existing conditions photographs (using Adobe Photoshop image editing software). The scale of the subjects in the photograph (the crane boom/flag) and the corresponding simulation (the Facility) is proportional to their surroundings.

For presentation purposes in this report, the photographs were produced in an approximate 7inch by 10.5-inch format. When reproducing the images in this format size, we believe it is important to present the largest view while providing key contextual landscape elements (existing developments, street signs, utility poles, etc.) so that the viewer can determine the proportionate scale of each object within the scene. Photo-documentation of the field

⁵ The Canon EOS 6D is a full-framed camera which includes a lens receptor of the same size as the film used in 35mm cameras. As such, the images produced are comparable to those taken with a conventional 35mm camera.

reconnaissance and photo-simulations of the proposed Facility are presented in the attachment at the end of this report. The field reconnaissance photos include the crane boom in the view to provide visual reference points for the approximate height and location of the proposed Facility relative to the scene. All simulations were created to represent the proposed 135-foot-tall monopole. The photo-simulations are intended to provide the reader with a general understanding of the different view characteristics associated with the Facility from various locations. Photographs were taken from publicly accessible areas and unobstructed view lines were chosen wherever possible.

<u>Table 1 – Photo Locations</u> summarizes the photographs and simulations presented in the attachment to this report, and includes a description of each location, view orientation, distance from where the photo was taken relative to the Site, and the general characteristics of the view. The photo locations are depicted on the photolog and viewshed maps provided as attachments to this report.

Photo	Location	Orientation	Distance to Site	Height of Facility Visible in Photograph	Visibility
1	Brookside Drive**	Southeast	± 0.45 Mile	N/A	Not Visible
2	Bittersweet Lane	Southeast	± 0.36 Mile	N/A	Not Visible
3	Platt Street	Southeast	± 0.28 Mile	60'-70'+	Seasonal
4	Avery Street	Southeast	± 0.26 Mile	70'-80'	Year Round
5	Laughlin Road	Southeast	± 0.35 Mile	80'-90'+	Seasonal
6	Patterson Avenue	East	± 0.34 Mile	70'-80'	Year Round
7	Patterson Avenue	East	± 0.46 Mile	10'-20'	Seasonal
8	Frog Pond Lane	East	± 0.32 Mile	60'-70'	Year Round
9	Stop & Shop Parking Lot – Adjacent to Host Property**	East	± 0.10 Mile	70'-80'	Year Round
10	Joey C's Boathouse Cantina & Grill – Adjacent to Host Property	Northwest	± 490 Feet	20'-30' above I-95; 40'-50' below I-95	Year Round
11	East Main Street	Northeast	± 0.26 Mile	70'-80'	Year Round
12	Barnum Avenue Cutoff**	North	± 0.25 Mile	80'-90'	Year Round
13	Bridgeport Avenue – Milford	Northwest	± 0.32 Mile	80'-90'	Year Round
	h was taken at 24 mm focal length. + . aph was taken at 35 mm focal length.	Is visible within the	e treeline		

Table 1 – Photo Locations

Photo	Location	Orientation	Distance to Site	Height of Facility Visible in Photograph	Visibility
14	Bridgeport Avenue – Milford	Northwest	± 0.45 Mile	70'-80'	Year Round
15	Riverside Drive – Milford	Northwest	± 0.38 Mile	80'-90'	Year Round
16	Riverside Drive at Sachem Street – Milford	West	± 0.35 Mile	60'-70' above I-95; 30'-40' below I-95	Seasonal
17	Spring Street at Bridgeport Avenue – Milford*	Northwest	± 0.53 Mile	N/A	Not Visible
18	Crescent Drive – Milford	Northwest	± 0.48 Mile	90'-100'	Year Round
19	Edgemont Road – Milford	Northwest	± 0.61 Mile	80'-90'	Year Round
20	Housatonic Drive – Milford	Northwest	± 0.66 Mile	N/A	Not Visible
21	Cowles Street at Strathmore Avenue – Milford	West	± 0.82 Mile	N/A	Not Visible
22	Elbon Street – Milford	West	± 0.65 Mile	10'-20'	Year Round
23	Housatonic River State Boat Launch – Milford	West	± 0.28 Mile	50'-60' below I-95	Year Round
24	Naugatuck Avenue – Milford	Southwest	± 0.50 Mile	80'-90'+	Seasonal
25	West Avenue at Naugatuck Avenue – Milford	Southwest	± 0.58 Mile	N/A	Not Visible
26	Naugatuck Avenue – Milford	Southwest	± 0.92 Mile	N/A	Not Visible
27	Oronoque Road – Milford	Southwest	± 1.34 Miles	N/A	Not Visible
28	Bronson Drive at Bridgeview Place*	South	± 1.14 Miles	N/A	Not Visible
29	Highland Avenue**	Southeast	± 1.34 Miles	N/A	Not Visible
30	Glendale Road at Charlton Street, Long Brook Park	East	± 0.69 Mile	N/A	Not Visible
31	North Avenue	East	± 1.27 Miles	N/A	Not Visible
32	Main Street	Northeast	± 1.01 Miles	N/A	Not Visible
33	LA Fitness – Parking Lot	Northeast	± 0.77 Mile	40'-50'	Year Roun
34	Ferry Boulevard	Northeast	± 0.91 Mile	N/A	Not Visible
35	Bond's Dock	Northeast	± 1.33 Miles	20'-30'+	Seasonal
36	Birdseye Street Boat Launch	Northeast	± 1.77 Miles	40'-50'	Year Roun
37	Milford Point Road – Milford	Northwest	± 2.00 Miles	N/A	Not Visible

Table 1 – Photo Locations (continued)

Final Visibility Mapping

Information obtained during the field reconnaissance was incorporated into the mapping data layers, including observations of the field reconnaissance, the photograph locations, areas that experienced recent land use changes and those places where the initial model was found to over or under-predict visibility. Once the additional data was integrated into the model, APT recalculated the visibility of the proposed Facility within the Study Area.

Conclusions

As presented on the attached viewshed maps, views of the Facility would be limited primarily to the commercial areas immediately surrounding the Site, along I-95 within ± 0.5 to ± 0.75 mile of the Facility, and over open water and marshland to the north and south. Photo locations 9 and 10 depict representative year-round views from the nearest areas, at distances ranging from approximately 490 feet to 0.10 mile away. Photo locations 11, 12, and 13 depict representative year-round views from the site, at distances ranging from approximately 0.25 to 0.32 mile away. The nearest residential areas with views are represented in photo locations 4 and 6, over 0.25 mile away.

Seasonally, when the leaves are off the deciduous trees, additional areas of obstructed visibility are predicted in the area surrounding the Facility and extending up to approximately 1.76 mile from the Site in the commercial development and residential area to the north and west of the Site, on the western shore of the Housatonic River north of the Site, and on the eastern shore of the Housatonic River south of the Site.

Predicted year-round visibility of the proposed Facility is estimated to include approximately 1,244 acres, of which $\pm 1,168$ acres occur over open water and the tidal wetlands associated with the mouth of the Housatonic River. Predicted seasonal visibility is estimated to include an additional ± 197 acres. Collectively, the total acreage of visibility represents ± 17.9 percent of the Study Area.

The maps provided as attachments to this report depict the areas of predicted visibility, but they do not address the character of those potential views. As shown in the photographs where the Site is visible, the surrounding area contains infrastructure associated with the rail line, raised sections of I-95, and electric transmission structures taller than the proposed tower, as well as large tracts of retail and commercial development.

Proximity to Schools And Commercial Child Day Care Centers

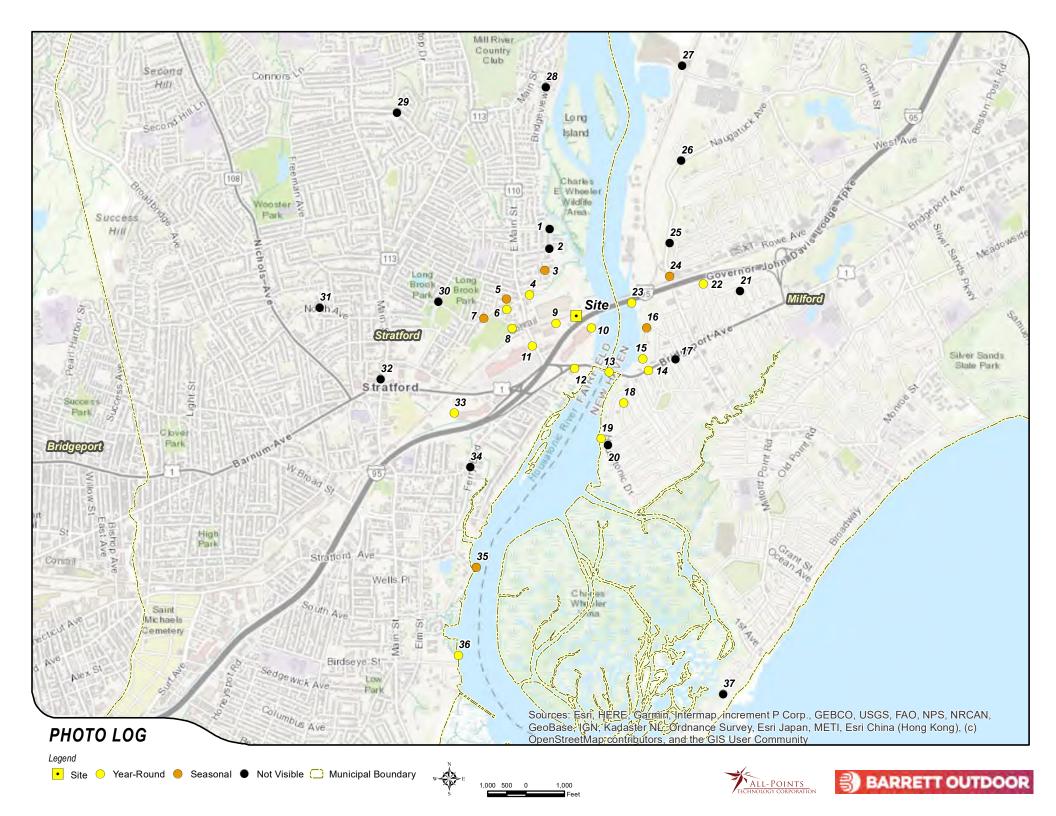
No schools or commercial day care centers are located within 250 feet of the proposed Facility. Wilcoxson Elementary School is located approximately 0.52-mile northwest of the Site at 600 Wilcoxson Avenue in Stratford. No visibility is predicted from the school grounds. The nearest commercial child care center is Mama N' Cubs Playschool, LLC approximately 0.54 mile to the southeast of the Site at 604 Naugatuck Avenue in Milford. No visibility is predicted from or in the vicinity of the day care center.

Limitations

The viewshed maps presented in the attachment to this report depict areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of five (5) feet above the ground and intervening topography, tree canopy, and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating aerial photographs, and in-field observations from publicly accessible locations. No access to private properties was provided to APT personnel. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.

The photo-simulations provide a representation of the Facility under similar settings as those encountered during the field review and reconnaissance. Views of the Facility can change throughout the seasons and the time of day, and are dependent on weather and other atmospheric conditions (e.g., haze, fog, clouds); the location, angle and intensity of the sun; and the specific viewer location. Weather conditions on the day of the field review included partly cloudy skies.

ATTACHMENTS





SOUTHEAST

ALL-POINTS TECHNOLOGY CORPORATION

+/- 0.45 MILE

BROOKSIDE DRIVE

1

BARRETT OUTDOOR

NOT VISIBLE





ALL-POINTS



РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	PLATT STREET	SOUTHEAST	+/- 0.28 MILE	SEASONAL



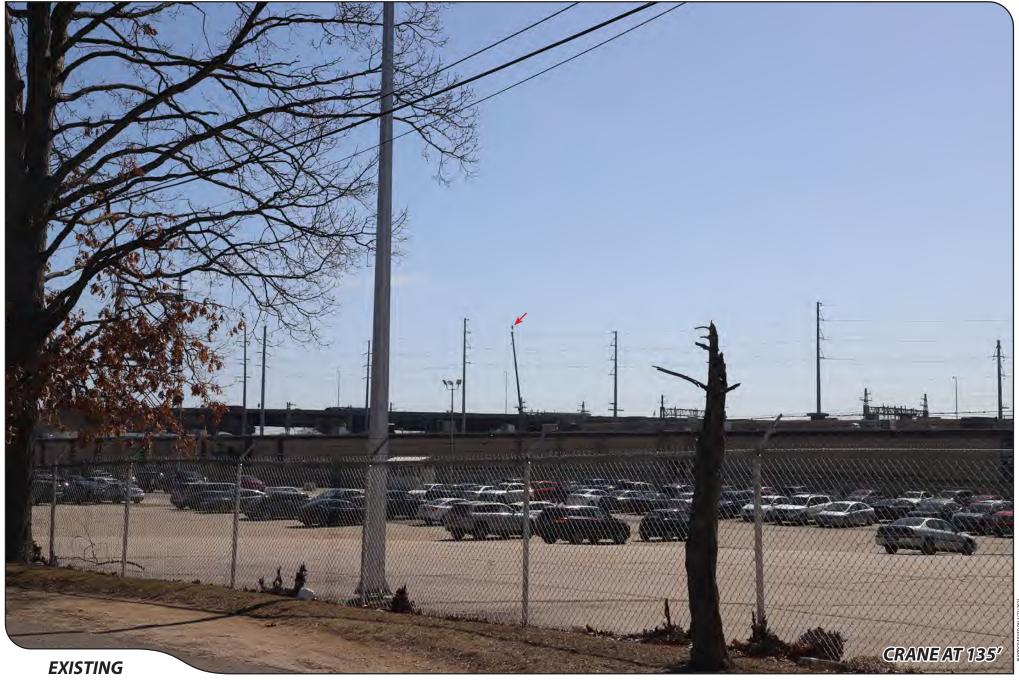




РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	PLATT STREET	SOUTHEAST	+/- 0.28 MILE	SEASONAL







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	AVERY STREET	SOUTHEAST	+/- 0.26 MILE	YEAR ROUND







4	AVERY STREET	SOUTHEAST	+/- 0.26 MILE	YEAR ROUND
РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY





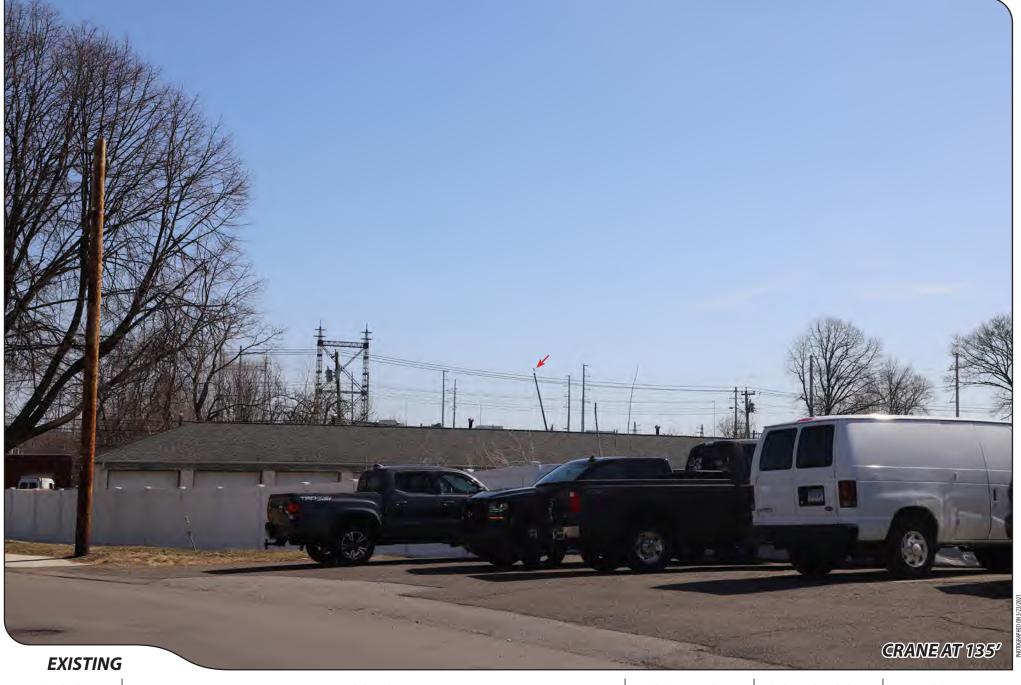




5	LAUGHIN ROAD	SOUTHEAST	+/- 0.35 MILE	SEASONAL
РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	PATTERSON AVENUE	EAST	+/- 0.34 MILE	YEAR ROUND





6	PATTERSON AVENUE	EAST	+/- 0.34 MILE	YEAR ROUND
РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	PATTERSON AVENUE	EAST	+/- 0.46 MILE	SEASONAL







PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	PATTERSON AVENUE	EAST	+/- 0.46 MILE	SEASONAL







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	FROG POND LANE	EAST	+/- 0.32 MILE	YEAR ROUND







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	FROG POND LANE	EAST	+/- 0.32 MILE	YEAR ROUND







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	STOP & SHOP PARKING LOT - ADJACENT TO HOST PROPERTY	EAST	+/- 0.10 MILE	YEAR ROUND







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	STOP & SHOP PARKING LOT - ADJACENT TO HOST PROPERTY	EAST	+/- 0.10 MILE	YEAR ROUND







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	JOEY C'S BOATHOUSE CANTINA & GRILL - ADJACENT TO HOST PROPERTY	NORTHWEST	+/- 490 FEET	YEAR ROUND



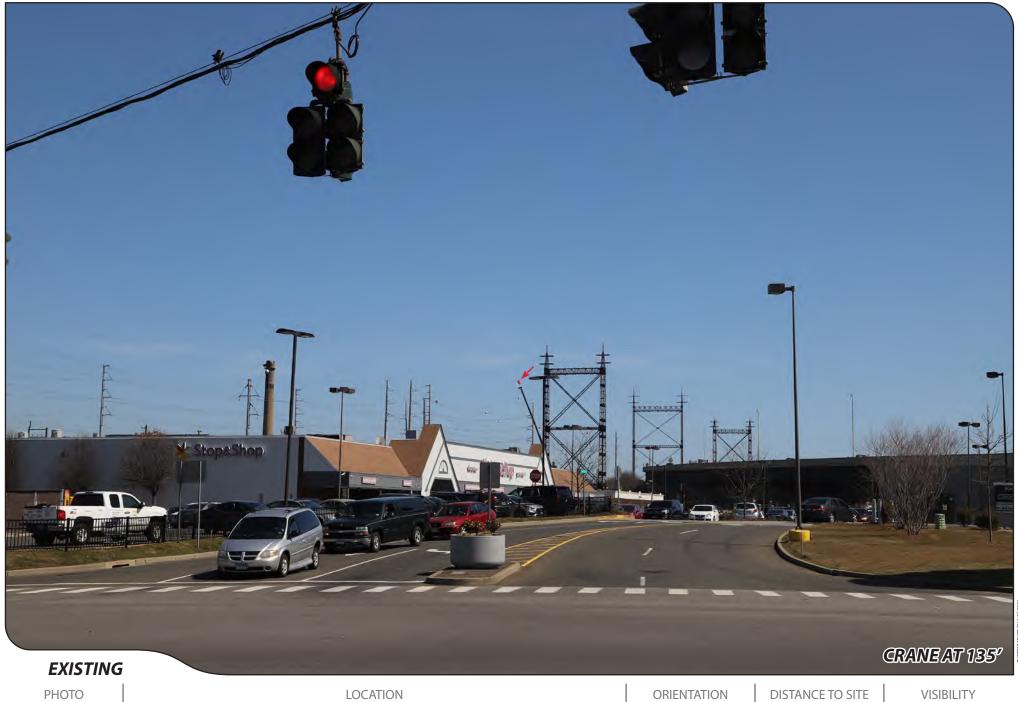




рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	JOEY C'S BOATHOUSE CANTINA & GRILL - ADJACENT TO HOST PROPERTY	NORTHWEST	+/- 490 FEET	YEAR ROUND



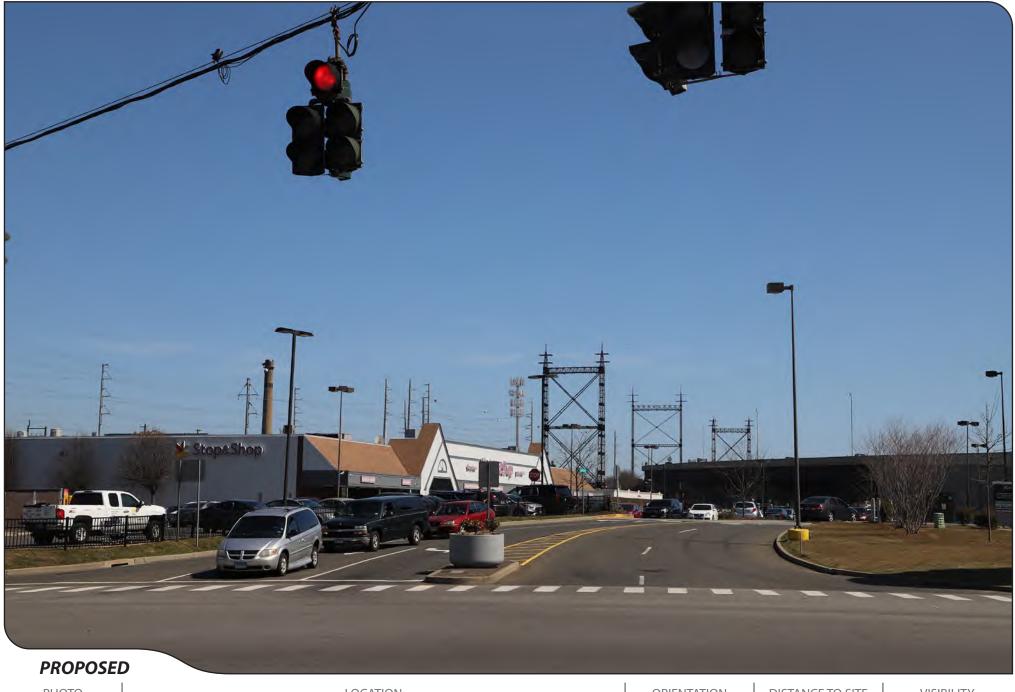




11



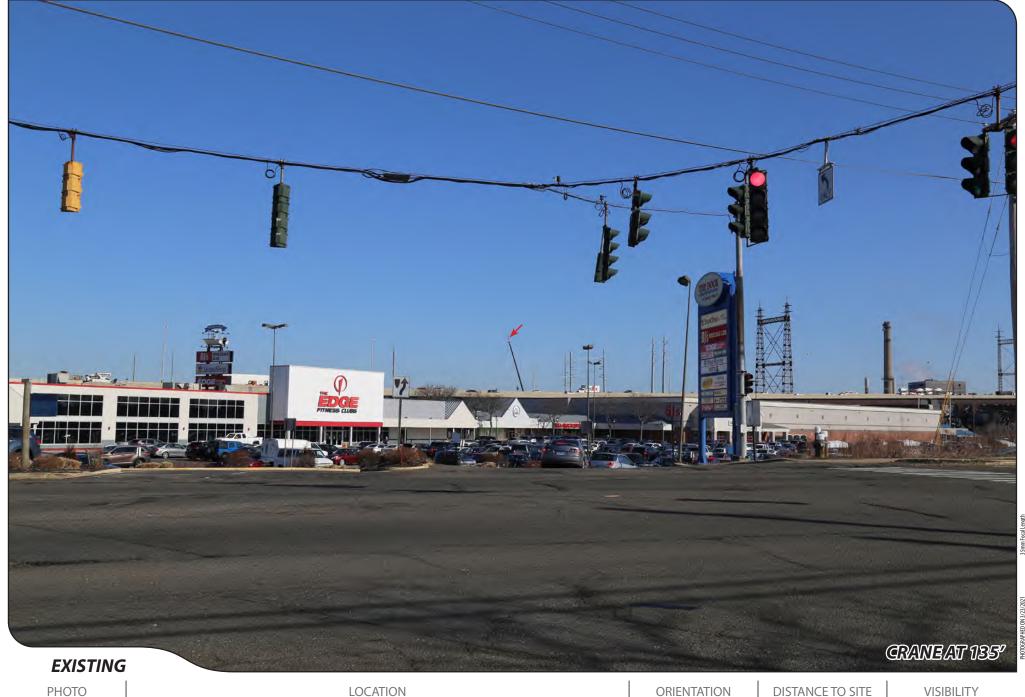




11	EAST MAIN STREET	NORTHEAST	+/- 0.26 MILE	YEAR ROUND
рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	BARNUM AVENUE CUTOFF	NORTH	+/- 0.25 MILE	YEAR ROUND



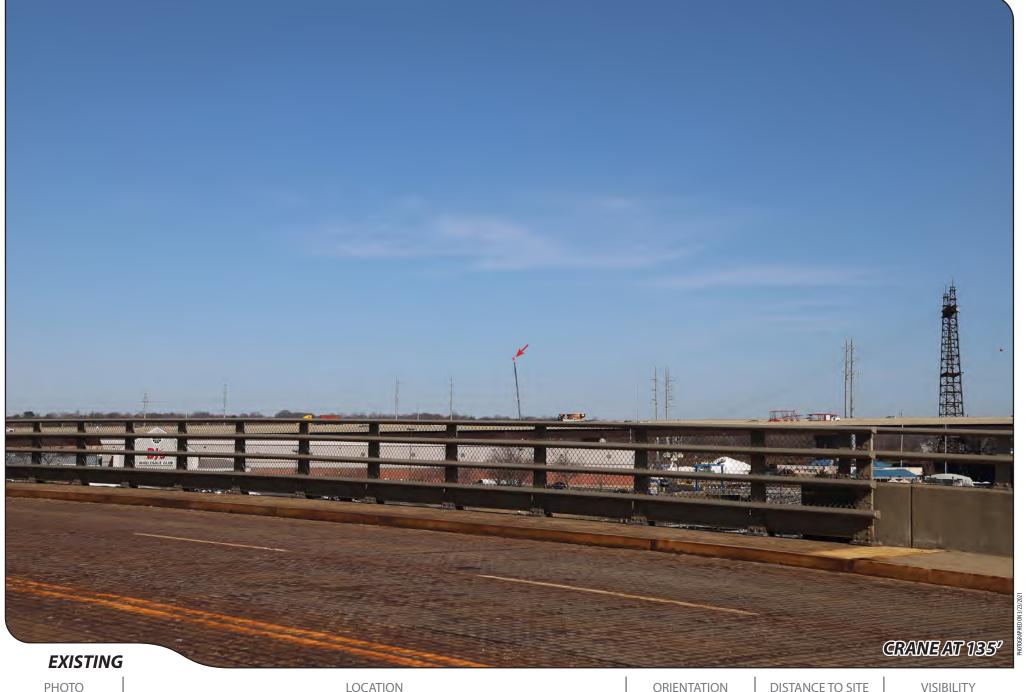




рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	BARNUM AVENUE CUTOFF	NORTH	+/- 0.25 MILE	YEAR ROUND







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
13	BRIDGEPORT AVENUE - MILFORD	NORTHWEST	+/- 0.32 MILE	YEAR ROUND



BARRETT OUTDOOR



	BRIDGEPORT AVENUE - MILFORD	NODTHWEST	+/- 0.32 MILE	YEAR ROUND
PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY













14	BRIDGEPORT AVENUE - MILFORD	NORTHWEST	+/- 0.45 MILE	YEAR ROUND
PHOIO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







 PHOTO
 ORIENTATION
 DISTANCE TO SITE
 VISIBILITY

 15
 RIVERSIDE DRIVE - MILFORD
 NORTHWEST
 +/- 0.38 MILE
 YEAR ROUND



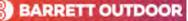


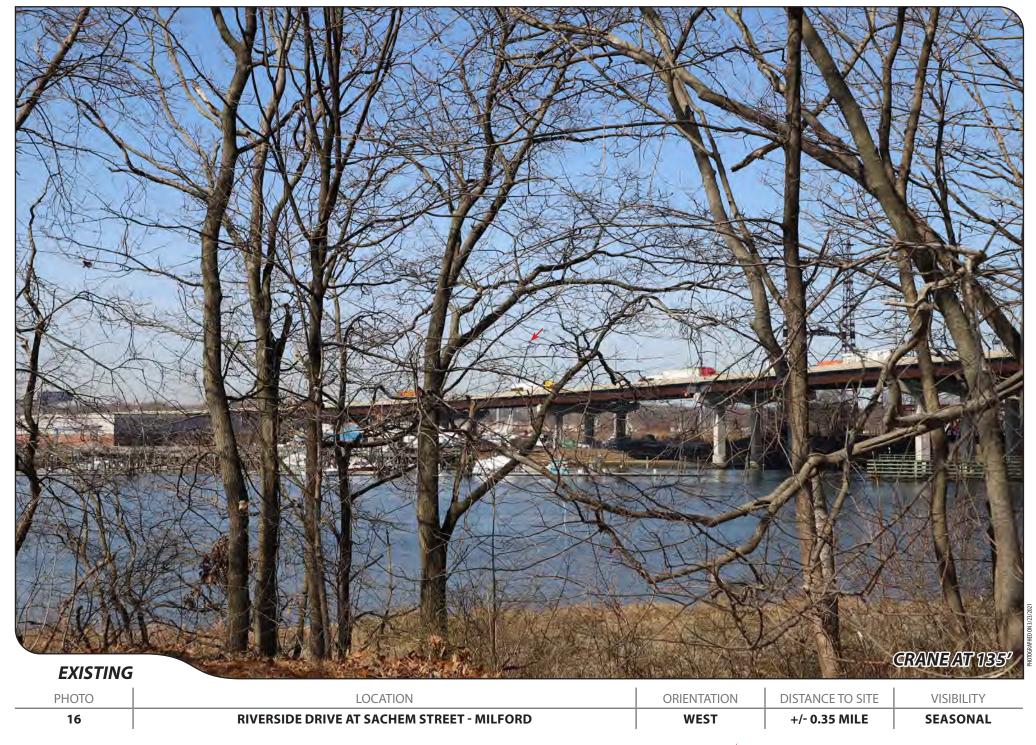


 PHOTO
 LOCATION
 ORIENTATION
 DISTANCE TO SITE
 VISIBILITY

 15
 RIVERSIDE DRIVE - MILFORD
 NORTHWEST
 +/- 0.38 MILE
 YEAR ROUND











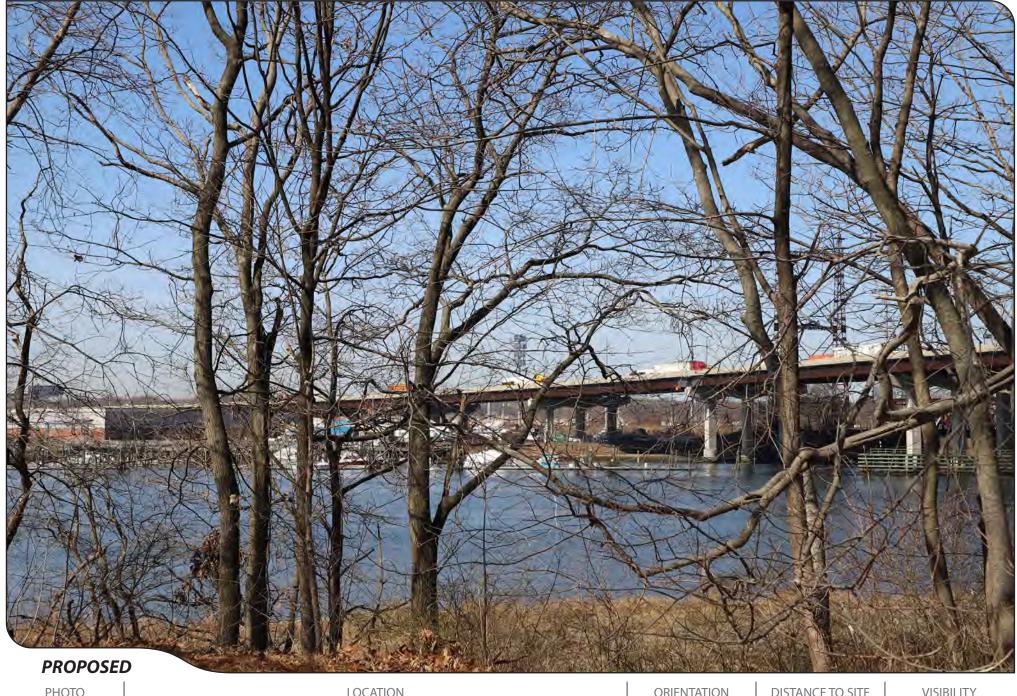


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
16	RIVERSIDE DRIVE AT SACHEM STREET - MILFORD	WEST	+/- 0.35 MILE	SEASONAL







EXISTING

рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	SPRING STREET AT BRIDGEPORT AVENUE - MILFORD	NORTHWEST	+/- 0.53 MILE	NOT VISIBLE











18	CRESCENT DRIVE - MILFORD	NORTHWEST	+/- 0.48 MILE	YEAR ROUND
РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
19	EDGEMONT ROAD - MILFORD	NORTHWEST	+/- 0.61 MILE	YEAR ROUND







PHOTO LOCATION ORIENTATION DISTANCE TO SIT	E VISIBILITY
19 EDGEMONT ROAD - MILFORD NORTHWEST +/- 0.61 MILE	YEAR ROUND

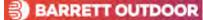






РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
20	HOUSATONIC DRIVE - MILFORD	NORTHWEST	+/- 0.66 MILE	NOT VISIBLE







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
21	COWLES STREET AT STRATHMORE AVENUE - MILFORD	WEST	+/- 0.82 MILE	NOT VISIBLE







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
22	ELBON STREET - MILFORD	WEST	+/- 0.65 MILE	YEAR ROUND



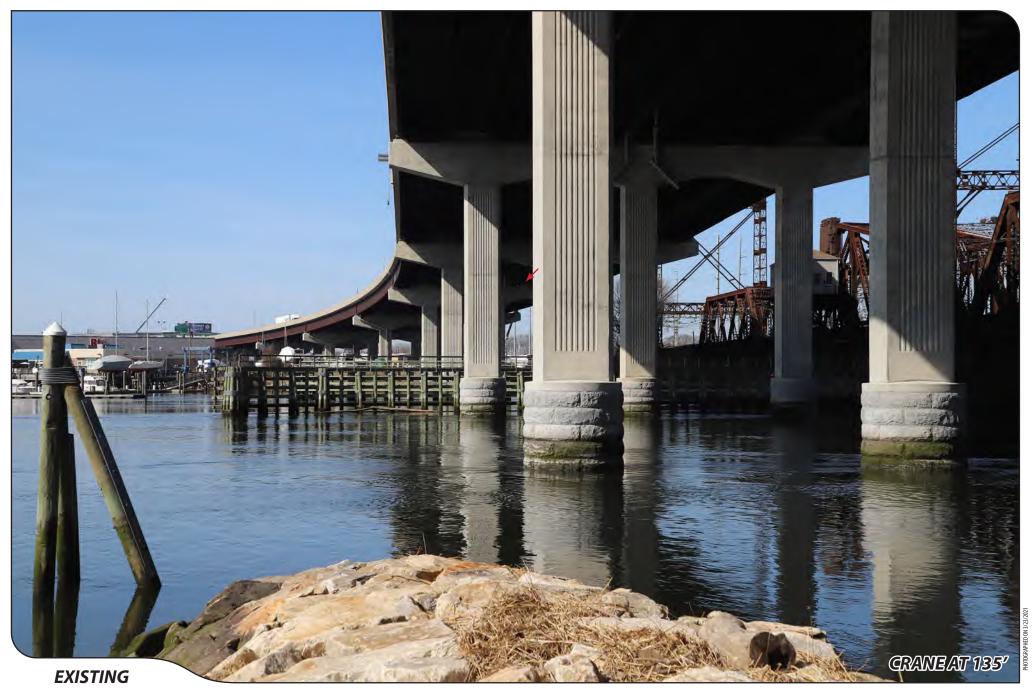




рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
22	ELBON STREET - MILFORD	WEST	+/- 0.65 MILE	YEAR ROUND







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
23	HOUSATONIC RIVER STATE BOAT LAUNCH - MILFORD	WEST	+/- 0.28 MILE	YEAR ROUND







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
23	HOUSATONIC RIVER STATE BOAT LAUNCH - MILFORD	WEST	+/- 0.28 MILE	YEAR ROUND













24	NAUGATUCK AVENUE - MILFORD	SOUTHWEST	+/- 0.50 MILE	SEASONAL
PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY







РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
25	WEST AVENUE AT NAUGATUCK AVENUE - MILFORD	SOUTHWEST	+/- 0.58 MILE	NOT VISIBLE







 PHOTO
 ORIENTATION
 DISTANCE TO SITE
 VISIBILITY

 26
 NAUGATUCK AVENUE - MILFORD
 SOUTHWEST
 +/- 0.92 MILE
 NOT VISIBLE







рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
27	ORONOQUE ROAD - MILFORD	SOUTHWEST	+/- 1.34 MILES	NOT VISIBLE







BARRETT OUTDOOR

TECHNOLOGY CORPORATION









EXISTING

РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
30	GLENDALE ROAD AT CHARLTON STREET, LONG BROOK PARK	EAST	+/- 0.69 MILE	NOT VISIBLE



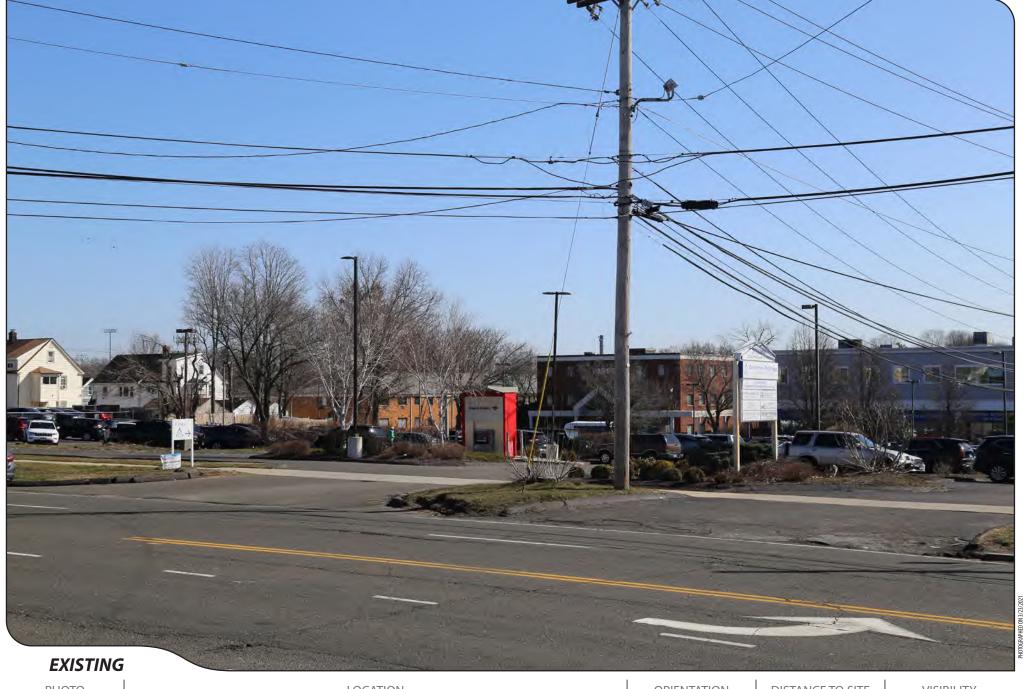




PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
31	NORTH AVENUE	EAST	+/- 1.27 MILES	NOT VISIBLE





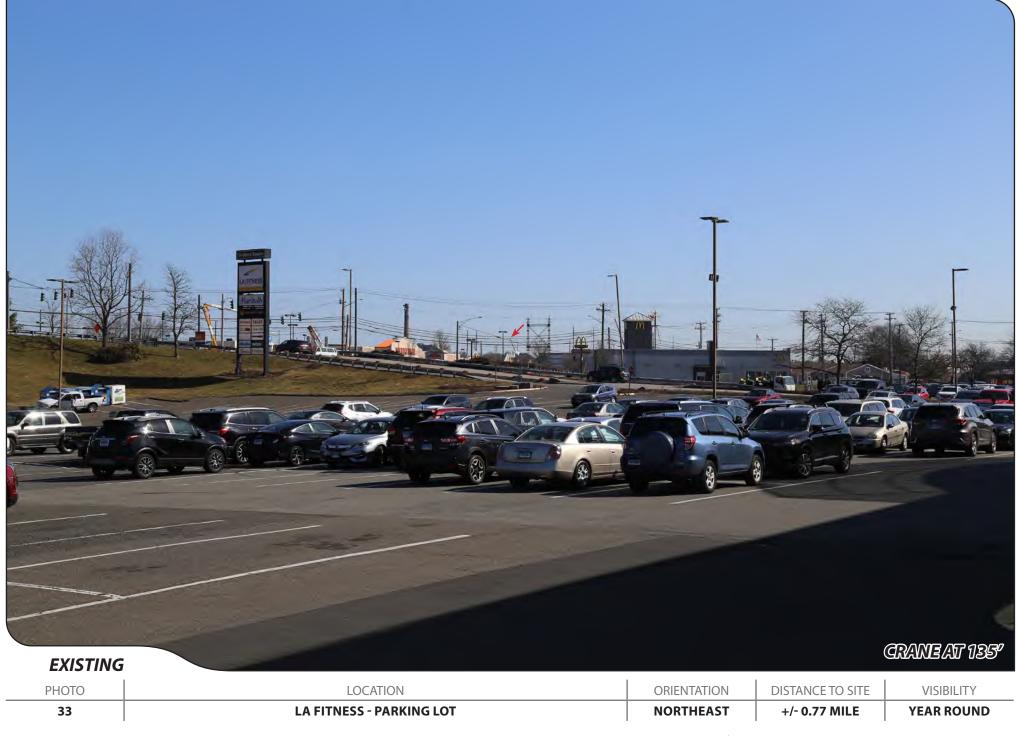


- T

рното	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
32	MAIN STREET	NORTHEAST	+/- 1.01 MILES	NOT VISIBLE











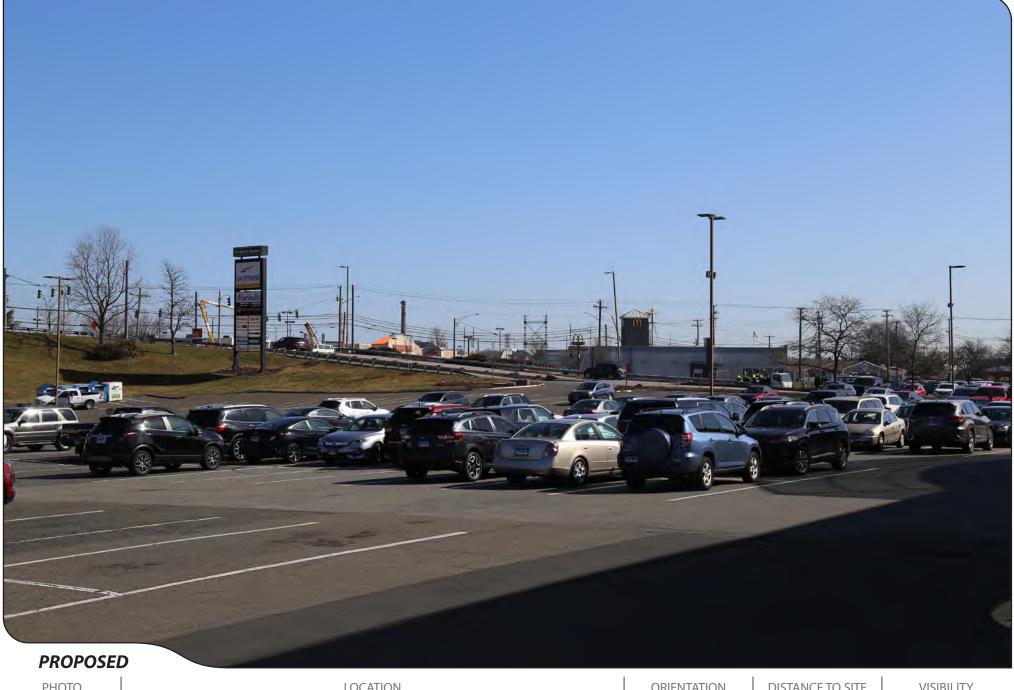


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
33	LA FITNESS - PARKING LOT	NORTHEAST	+/- 0.77 MILE	YEAR ROUND



















BOND'S DOCK	NORTHEAST	+/- 1.33 MILES	SEASONAL













PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
36	BIRDSEYE STREET BOAT LAUNCH	NORTHEAST	+/- 1.77 MILES	YEAR ROUND



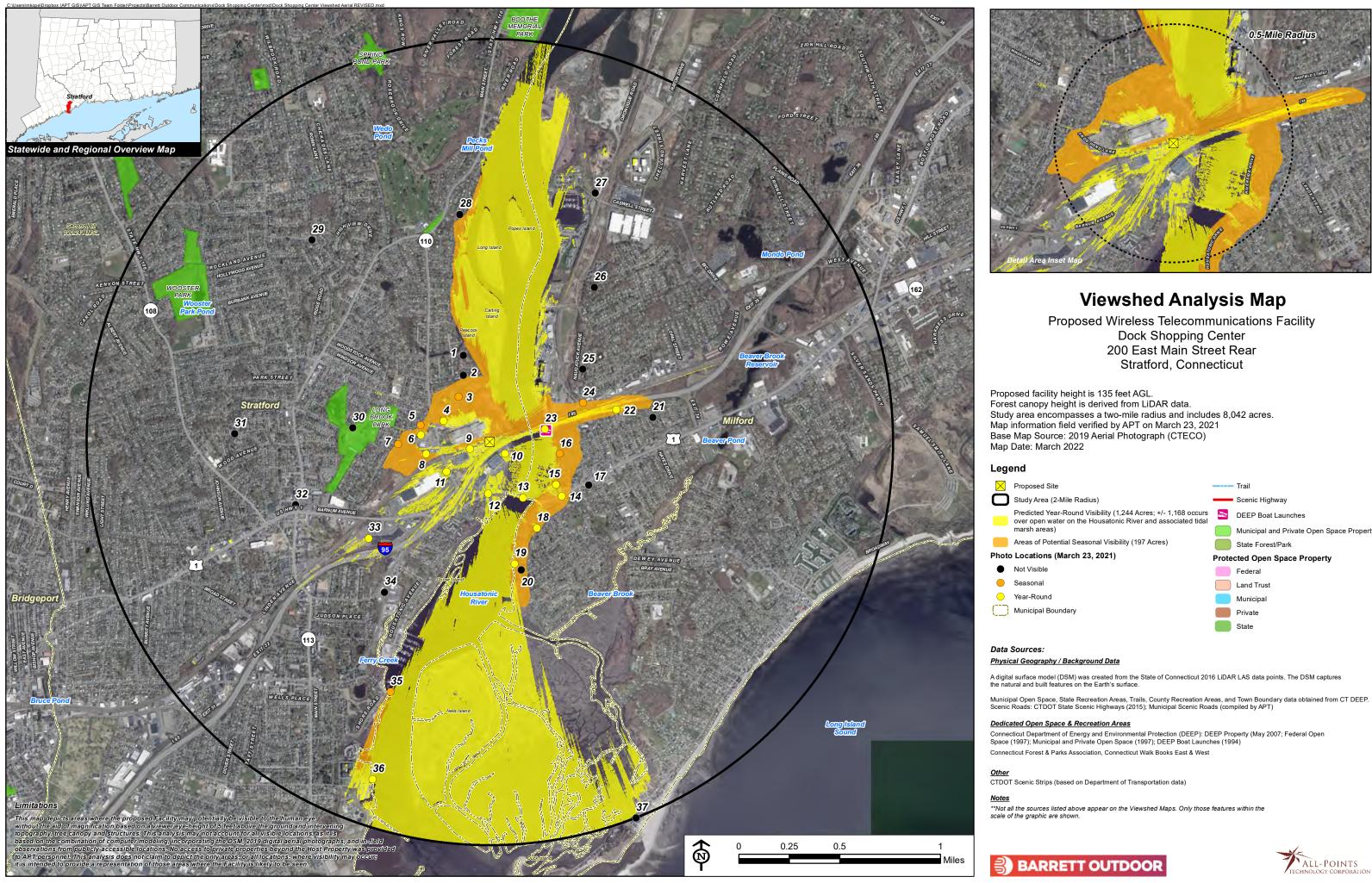




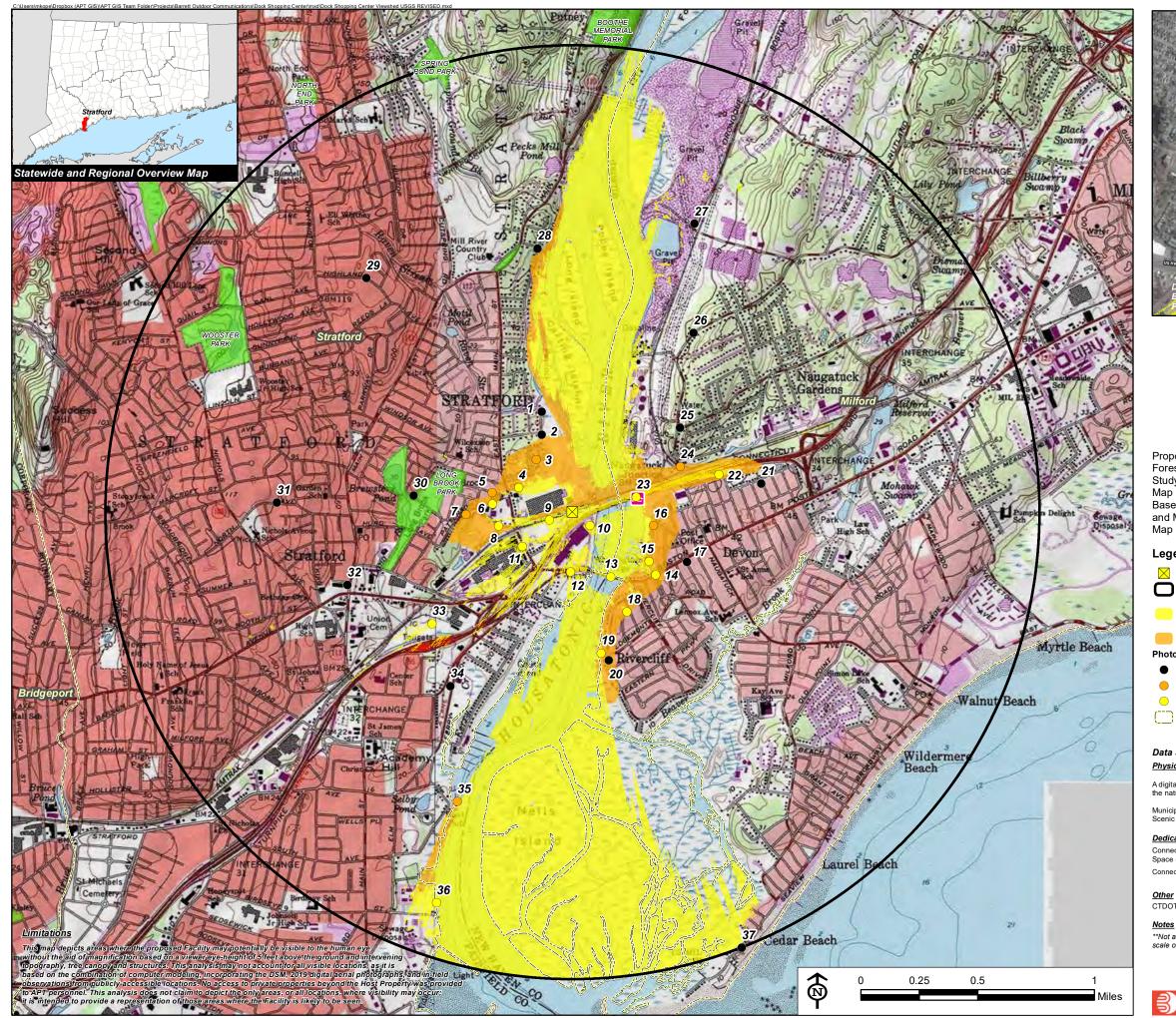
РНОТО	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
37	MILFORD POINT ROAD - MILFORD	NORTHWEST	+/- 2.00 MILES	NOT VISIBLE







Proposed Site		Trail	
Study Area (2-Mile Radius)		Scenic Highway	
Predicted Year-Round Visibility (1,244 Acres; +/- 1,168 occurs over open water on the Housatonic River and associated tidal	*	DEEP Boat Launches	
marsh areas)		Municipal and Private Open Space Property	
Areas of Potential Seasonal Visibility (197 Acres)		State Forest/Park	
Locations (March 23, 2021)	Prote	Protected Open Space Property	
Not Visible		Federal	
Seasonal		Land Trust	
Year-Round		Municipal	
Municipal Boundary		Private	
		State	



Legend \times

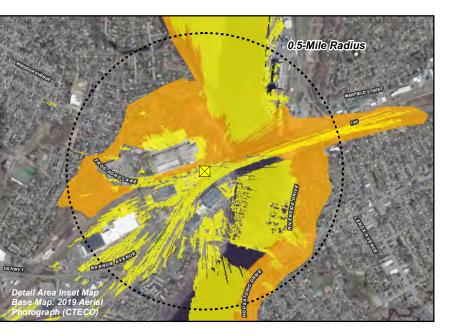
Photo \bigcirc \square

Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP. Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)

Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994) Connecticut Forest & Parks Association, Connecticut Walk Books East & West

<u>Other</u>

<u>Notes</u> **Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown



Viewshed Analysis Map

Proposed Wireless Telecommunications Facility Dock Shopping Center 200 East Main Street Rear Stratford, Connecticut

Proposed facility height is 135 feet AGL. Forest canopy height is derived from LiDAR data. Study area encompasses a two-mile radius and includes 8,042 acres. Map information field verified by APT on March 23, 2021 Base Map Source: USGS 7.5 Minute Topographic Quadrangle Map, Bridgeport, CT (1984) and Milford, CT (1984) Map Date: March 2022

Proposed Site		Trail
Study Area (2-Mile Radius)		Scenic Highway
Predicted Year-Round Visibility (1,244 Acres; +/- 1,168 occurs over open water on the Housatonic River and associated tidal	*	DEEP Boat Launches
marsh areas)		Municipal and Private Open Space Property
Areas of Potential Seasonal Visibility (197 Acres)		State Forest/Park
D Locations (March 23, 2021)	cted Open Space Property	
Not Visible		Federal
Seasonal		Land Trust
Year-Round		Municipal
Municipal Boundary		Private
		State

Data Sources:

Physical Geography / Background Data

A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.

Dedicated Open Space & Recreation Areas

CTDOT Scenic Strips (based on Department of Transportation data)





Tab



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Calculated Radio Frequency Exposure Report

Barrett Outdoor Communications, Inc.

200 East Main Street Rear, Stratford, CT 06614

July 5, 2022

Table of Contents

1. Introduction	1
2. FCC Guidelines for Evaluating RF Radiation Exposure Limits	1
3. RF Exposure Calculation Methods	2
4. Calculation Results	3
5. Conclusion	4
6. Statement of Certification	4
Attachment A: References	5
Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)	6
Attachment C: AT&T Antenna Data Sheets and Electrical Patterns	8
Attachment D: Verizon Wireless Antenna Data Sheets and Electrical Patterns	.10

List of Tables

Table 1: Proposed Tower % MPE
Table 2: FCC Limits for Maximum Permissible Exposure (MPE) 6

List of Figures



1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the antenna arrays to be mounted on the proposed monopole at 200 East Main Street Rear in Stratford, CT. The coordinates of the proposed tower are 41° 12' 14.93" N, 73° 06' 47.91" W.

AT&T and Verizon are proposed to locate the following equipment:

- AT&T Two (2) multi-band antennas and two (2) C-band antennas per sector to support its LTE & 5G NR networks;
- Verizon Up to five (5) multi-band antennas per sector to support its 5G NR, LTE, and CDMA networks;

This report considers the planned antenna configurations¹ as provided by each operator to calculate the % MPE (Maximum Permissible Exposure) of the proposed installation.

2. FCC Guidelines for Evaluating RF Radiation Exposure Limits

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by OET Bulletin 65 Edition 97-01. These new rules include Maximum Permissible Exposure (MPE) limits for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based upon those recommended by the National Council on Radiation Protection and Measurements (NCRP), developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

The FCC general population/uncontrolled limits set the maximum exposure to which most people may be subjected. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

Public exposure to radio frequencies is regulated and enforced in units of milliwatts per square centimeter (mW/cm²). The general population exposure limits for the various frequency ranges are defined in the attached "FCC Limits for Maximum Permissible Exposure (MPE)" in Attachment B of this report.

Higher exposure limits are permitted under the occupational/controlled exposure category, but only for persons who are exposed as a consequence of their employment and who have been made fully aware of the potential for exposure, and they must be able to exercise control over their exposure. General population/uncontrolled limits are five times more stringent than the levels that are acceptable for occupational, or radio frequency trained individuals. Attachment B contains excerpts from OET Bulletin 65 and defines the Maximum Exposure Limit.

Finally, it should be noted that the MPE limits adopted by the FCC for both general population/uncontrolled exposure and for occupational/controlled exposure incorporate a substantial margin of safety and have been established to be well below levels generally accepted as having the potential to cause adverse health effects.

¹ As referenced in AT&T's Radio Frequency Design Sheet (RFDS) updated 06/01/2022, and Verizon's RFDS dated 4/22/2021.



3. RF Exposure Calculation Methods

The power density calculation results were generated using the following formula as outlined in FCC bulletin OET 65, and Connecticut Siting Council recommendations:

Power Density =
$$\left(\frac{1.6^2 \times 1.64 \times \text{ERP}}{4\pi \times R^2}\right)$$
 X Off Beam Loss

Where:

EIRP = Effective Isotropic Radiated Power = 1.64 x ERP

R = Radial Distance = $\sqrt{(H^2 + V^2)}$

H = Horizontal Distance from antenna

V = Vertical Distance from radiation center of antenna

Ground reflection factor of 1.6

Off Beam Loss is determined by the selected antenna pattern

These calculations assume that the antennas are operating at 100 percent capacity and full power, and that all antenna channels are transmitting simultaneously. Obstructions (trees, buildings, etc.) that would normally attenuate the signal are not taken into account. The calculations assume even terrain in the area of study and do not consider actual terrain elevations which could attenuate the signal. As a result, the calculated power density and corresponding % MPE levels reported below are much higher than the actual levels will be from the final installation.



4. Calculation Results

Table 1 below outlines the power density information for the proposed installation. All proposed antennas are directional in nature; therefore, the majority of the RF power is focused out towards the horizon. As a result, there will be less RF power directed below the antennas relative to the horizon, and consequently lower power density levels around the base of the tower. Please refer to Attachments C and D^2 for the vertical patterns of the proposed AT&T and Verizon antennas, respectively. The calculated results in Table 1 include a nominal 10 dB off-beam pattern loss to account for the lower relative gain below the antennas.

Carrier	Antenna Height (Feet)	Operating Frequency (MHz)	Number of Trans.	ERP Per Transmitter (Watts)	Power Density (mw/cm ²)	Limit	% MPE
AT&T	132	758	1	3541	0.0080	0.5053	1.59%
AT&T	132	2100	1	9890	0.0224	1.0000	2.24%
AT&T	132	734	1	3156	0.0072	0.4893	1.46%
AT&T	132	880	1	3883	0.0088	0.5867	1.50%
AT&T	132	1900	1	5877	0.0133	1.0000	1.33%
AT&T	132	3700	1	24266	0.0550	1.0000	5.50%
AT&T	132	3700	1	24266	0.0550	1.0000	5.50%
Verizon LTE	119	751	1	4160	0.0117	0.5007	2.34%
Verizon LTE / 5G NR	119	875	1	5118	0.0144	0.5833	2.47%
Verizon CDMA	119	890	1	557	0.0016	0.5933	0.26%
Verizon LTE	119	1980	1	9980	0.0281	1.0000	2.81%
Verizon LTE	119	2120	1	10694	0.0301	1.0000	3.01%
Verizon LTE	119	3550	1	217	0.0006	1.0000	0.06%
Verizon 5G NR	119	3700	1	43254	0.1219	1.0000	12.19%
						Total	42.27%

Table 1: Proposed Tower % MPE ^{3 4}

² The Verizon and AT&T 3500-3700 MHz antennas are integrated within the radio and antenna pattern specifications are not available for publication in this report.

³ In the case where antenna models are not uniform across all sectors for the same frequency band, the antenna model with the highest gain was used for the calculations to present a worse-case scenario.

⁴ Antenna heights listed are in reference to the All Points Technology Corp., P.C. site drawings dated 6/13/2022 (Rev. 13).



5. Conclusion

The above analysis concludes that RF exposure at ground level from the proposed tower will be below the maximum power density limits as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Using the conservative calculation methods discussed herein, the highest expected percent of Maximum Permissible Exposure at ground level from the proposed installation is **42.27% of the FCC General Population/Uncontrolled limit**.

As noted previously, the calculated % MPE levels are more conservative (higher) than the actual levels will be from the finished installation.

6. Statement of Certification

I certify to the best of my knowledge that the statements in this report are true and accurate. The calculations follow guidelines set forth in FCC OET Bulletin 65 Edition 97-01, ANSI/IEEE Std. C95.1, and ANSI/IEEE Std. C95.3.

Report Prepared By:

Ram Acharya RF Engineer C Squared Systems, LLC <u>July 5, 2022</u> Date

Keith Wellante

Reviewed/Approved By:

Keith Vellante RF Manager C Squared Systems, LLC July 5, 2022 Date



Attachment A: References

OET Bulletin 65 - Edition 97-01 - August 1997 Federal Communications Commission Office of Engineering & Technology

IEEE C95.1-2005, IEEE Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz IEEE-SA Standards Board

IEEE C95.3-2002 (R2008), IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to Such Fields, 100 kHz-300 GHz IEEE-SA Standards Board



Limits for Occu	pational/Contro	olled Exposure ⁵		
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	$(900/f^2)^*$	6
30-300	61.4	0.163	1.0	6
300-1500	-	-	f/300	6
1500-100,000	-	-	5	6

Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)

(B) Limits for General Population/Uncontrolled Exposure⁶

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f ²)*	30
30-300	27.5	0.073	0.2	30
300-1500	-	-	f/1500	30
1500-100,000	-	-	1.0	30

Table 2: FCC Limits for Maximum Permissible Exposure (MPE)

⁵ Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure

⁶ General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure



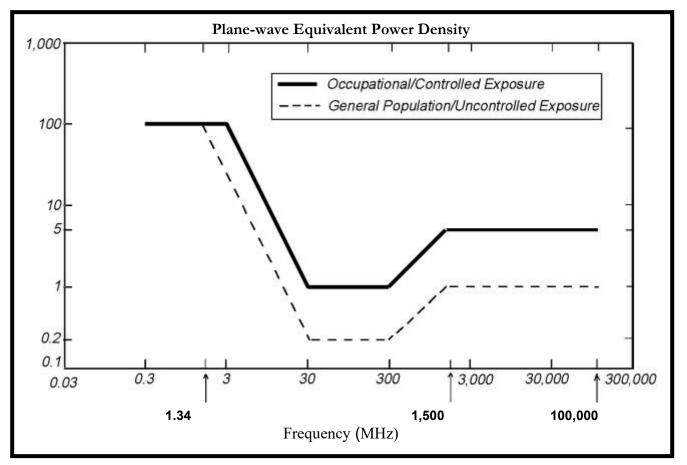
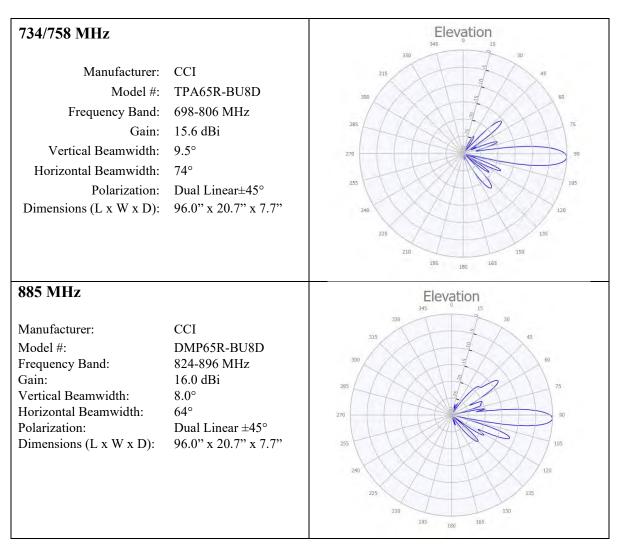


Figure 1: Graph of FCC Limits for Maximum Permissible Exposure (MPE)





Attachment C: AT&T Antenna Data Sheets and Electrical Patterns



