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October 26, 2022

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

Re: **Docket No. 511 – Application of Barrett Outdoor Communications, Inc. 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**

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced Application for the construction, operation and maintenance of a new telecommunications facility at 200 East Main Street (Rear) in Stratford, Connecticut.

On July 25, 2022, Barrett Outdoor Communications, Inc. (the “Applicant”) filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Proposed Facility”) on an approximately 4.37-acre parcel at 200 East Main Street (Rear) in Stratford, Connecticut (the “Property”). The Property is owned by UB Railside LLC and is used as a commercial boat storage yard.

On August 19, 2022, the Council approved Cellco’s Petition to Intervene in Docket No. 511. If approved by the Council, Cellco intends to share the Proposed Facility by installing antennas on the tower and associated equipment on a steel platform near the base of the tower.

Facility Description

The Applicant proposes to construct a 135-foot monopole tower, within a 4,210 square foot (“s.f.”) compound. Within the compound, the Applicant would install a 1,498 s.f. elevated equipment platform. Cellco would install antennas and remote radio heads on an antenna platform at the 121-foot level on the tower. Cellco’s radio cabinets and a backup battery cabinet would be installed on a portion of the raised equipment platform. Access to the Proposed Facility would extend from East Main Street over a portion of a paved parking lot and the paved boat storage area. Utilities to the tower site will extend from existing service along East Main Street and an existing electric transformer on the Property.

Cellco is exploring, with the Applicant, opportunities to install a back-generator at this site. Currently, Cellco has no plans to install a generator due to internal environmental controls which prohibit the use of a diesel-fueled generator at the Property. Due to the limited amount of space within the Proposed Facility compound and equipment platform, Cellco cannot install a propane-fuel generator and the accompanying propane fuel tank.

Standard of Review

Cellco respectfully submits that it has entered ample and unrefuted evidence into the Docket No. 511 record to demonstrate its need for improved wireless service in Stratford, particularly in the area around the Property, including along significant portions of Interstate 95 (“I-95”), U.S. Route 1, the Metro-North rail line and local roads in the area. The record also contains ample evidence that the nature of the probable environmental effects associated with the Proposed Facility are not substantial and do not outweigh the need for the Proposed Facility.

Public Need

Cellco currently maintains an existing non-tower antenna array (“NTAA”) on a billboard at 28 Sydney Street in Stratford. The billboard is owned by the Applicant. Cellco maintains antennas at the top of the billboard at heights of 67 and 69.5 feet above ground level (“AGL”). The existing NTAA provides wireless service to Interstate 95 (“I-95”), U.S. Route 1 and the surrounding roads and commercial areas in southern Stratford. In March of 2018, the Applicant contacted Cellco about its plans to redevelop a portion of the billboard site which would require Cellco to relocate its existing Stratford South facility. The Applicant offered to build a new tower site in the vicinity of the existing NTAA to accommodate Cellco’s need to maintain wireless service in the area around the Property. The replacement facility is presented in the Docket No. 511 Application filed with the Council on July 22, 2022.

If the Docket No. 511 facility is approved, Cellco intends to install antennas and remote radio heads on an antenna platform at a centerline height of 121 feet AGL. Increasing its antenna height from 67 and 69.5 feet AGL on the NTAA to 121 feet AGL on the Proposed Facility tower would allow Cellco to improve its wireless service in the area and extend wireless service further to the north, into an area where existing wireless service is currently unreliable or non-existent.¹

In addition to the significant and additional coverage benefits, the Proposed Facility will also allow Cellco to eliminate existing capacity problems at the NTAA and the adjacent Stratford West CT (Alpha Sector) facility. Significant improvements in the level of reliable service in these areas will occur once the Proposed Facility is constructed and Cellco's cell site is activated.

Nature of Probable Environmental Impacts

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

Conclusion

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

¹ Cellco has been unsuccessful in its search for an additional cell site location to the north of the Property for several years.

Melanie Bachman, Esq.
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Sincerely,

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

Kenneth C. Baldwin

KCB/
Copy to:
Service List