

Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



WILTON SOUTH
180 SCHOOL ROAD
WILTON, CONNECTICUT

DOCKET No. _____

MARCH 17, 2023

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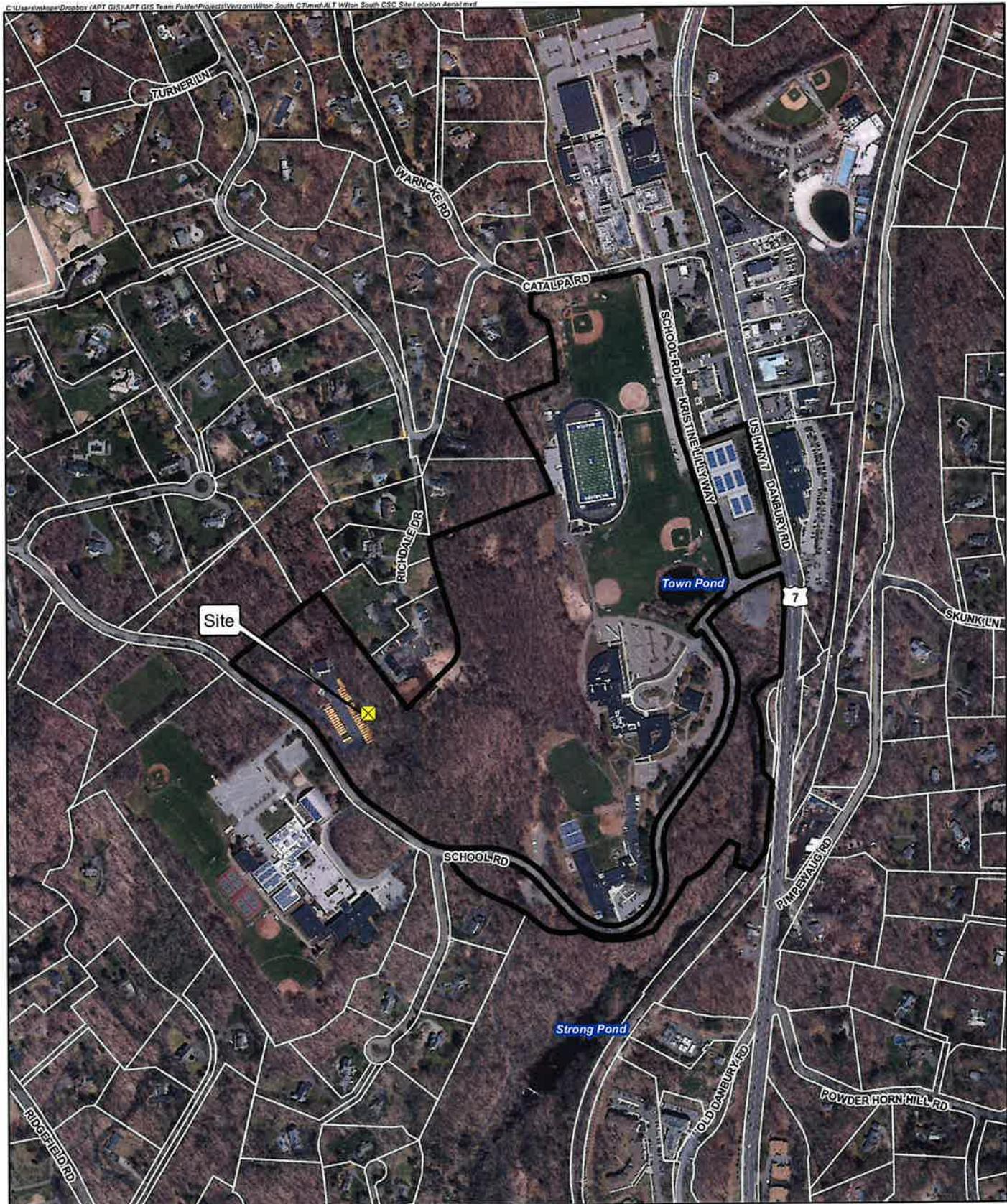
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1. Wilton South Facility – Factual Summary and Project Plans
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4. List of Abutting Landowners and Certificate of Service; Notice Letter
5. Federal Communications Commission Licenses
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8. Visibility Analysis
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EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 109.27-acre parcel at 180 School Road in Wilton, Connecticut (collectively the “Property”). The Property is owned by the Town of Wilton. Cellco refers to this cell site as its “Wilton South Facility”. The Wilton South Facility would be located adjacent to a school bus parking lot in the northwesterly portion of the Property. The Wilton South Facility would allow Cellco to provide improved wireless services to customers in central and western portions of Wilton, where reliable wireless service is either lacking or non-existent today.

Cellco proposes to construct a 123-foot tall monopole tower disguised as a pine tree, (a “monopine”) within a 60’ x 60’ (3,600 square-foot) fenced compound and leased area near the southeast corner of the school bus parking lot. Cellco would install twelve (12) panel-type antennas and twelve (12) remote radio heads at the top of the tower. Faux pine tree branches will extend approximately five (5) feet above the top of the tower to a height of 128 feet. A radio equipment cabinet, a backup battery cabinet, a propane-fueled backup generator, and a 1000-gallon propane fuel tank would all be installed within the fenced facility compound. Vehicular access to the Wilton South Facility would extend from an existing site entrance along School Road, through the existing school bus parking lot to the cell site. A short gravel access driveway would extend from the existing paved parking area to the compound entrance. Electric and fiber service would extend from existing utility service at the Town garage and along School Road to the cell site.



Legend

- Site
- Subject Property
- Approximate Parcel Boundary

Site Location Map

Proposed Wireless
Telecommunications Facility
Wilton South CT
180 School Road
Wilton, Connecticut

verizon

Map Notes:
Base Map Source: CT ECO 2019 Imagery
Map Scale: 1 Inch = 600 feet
Map Date: March 2023





Legend

- Proposed Verizon Wireless Equipment Compound
- Proposed Verizon Wireless Equipment
- Existing Equipment (By Others)
- Proposed Verizon Conduit
- Existing Utility Pole (By Others)
- Subject Property
- Approximate Parcel Boundary

Site Schematic

Proposed Wireless
Telecommunications Facility
Wilton South CT
180 School Road
Wilton, Connecticut

verizon

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP	:	DOCKET NO. _____
D/B/A VERIZON WIRELESS FOR A	:	
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE	:	
AND OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT	:	
180 SCHOOL ROAD IN WILTON,	:	
CONNECTICUT	:	MARCH 17, 2023

**APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (collectively, the “Application”) is submitted by Cellco Partnership d/b/a Verizon Wireless (“Cellco” or the “Applicant”), pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes (“C.G.S.”), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (“R.C.S.A.”), as amended. The Application requests that the Connecticut Siting Council (“Council”) issue a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction, maintenance, and operation of a wireless telecommunications facility at 180 School Road in Wilton, Connecticut (the “Property”). Cellco identifies this cell site as its Wilton South Facility (the “Wilton South Facility” or “Facility”). The Facility will consist of a 123-foot monopole tower, disguised as a pine tree (a “monopine”) located in the northwest portion of the Property adjacent to an existing school bus parking lot. Cellco would install antennas and

remote radio heads at the top of the monopine tower. Faux tree branches will screen Cellco's proposed antennas and extend approximately five feet above the top of the tower (128 feet above ground level ("AGL")). The monopine tower, Cellco's equipment and battery cabinets, a 50-kilowatt ("kW") propane-fueled generator, and a 1000-gallon propane fuel tank will be installed within the 60-foot x 60-foot fenced compound.

Included in this Application as Attachment 1 is a factual summary and project plans for the proposed Facility. This summary, along with the other attachments submitted as part of this Application, contain the site-specific information required by statute and the regulations of the Council.

B. The Applicant

Cellco is a Delaware Partnership with an administrative office located at 20 Alexander Drive, Wallingford, CT 06492. Cellco is licensed by the Federal Communications Commission ("FCC") to operate a wireless telecommunications system in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public. Operation of the wireless telecommunications systems and related activities are Cellco's sole business in the State of Connecticut.

Correspondence and/or communications regarding this Application may be addressed to:

Cellco Partnership d/b/a Verizon Wireless
20 Alexander Drive
Wallingford, Connecticut 06492
Attention: Timothy Parks, Real Estate Regulatory Specialist
Elizabeth Glidden, Real Estate Regulatory Specialist

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP
280 Trumbull Street
Hartford, Connecticut 06103-3597
(860) 275-8200
Attention: Kenneth C. Baldwin, Esq.

C. Application Fee

The estimated total construction cost for the Wilton South Facility would be less than \$5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations of Connecticut State Agencies, an application fee of \$1,250 accompanies this Application in the form of a check payable to the Council.

II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50l(b)

Copies of this Application have been mailed to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50l(b). A certificate of service, along with a list of the officials served with a copy of the Application, is included as Attachment 2.

Notice of Cellco's intent to submit this Application was published on March 10 and 11, 2023, by Cellco in *The Hour* pursuant to C.G.S. Section 16-50l(b). A copy of the legal notice is included in Attachment 3. A copy of an Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Cellco's intent to file this Application was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50l(b), as well as a list of the property owners to whom such notice was sent and a sample notice letter, including attachments.

III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES

The purpose of this section is to provide an overview and general description of the proposed Wilton South Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the "Act"). (Pub. L. No. 104-104, 140 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation in all aspects of the telecommunications industry to foster lower prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by states and municipalities, including the Council, with respect to public need for the service to be provided by the facility described in this Application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirement in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco's system throughout its New

England and national markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States, Congress also enacted the Wireless Communications and Public Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004, Congress enacted the Enhanced 911 (E-911) Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued Presidential Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy¹ to 1) ensure that all Americans would have access to broadband capability, whether wired or wireless, 2) establish the United States as a leader in wireless service innovation, and 3) establish, in America, the fastest and most extensive wireless network. In an effort to encourage a more timely review and approval of wireless facility siting applications, the FCC, in 2011, established specific time limits for local and State land use decisions on wireless facilities.²

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

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

In 2012, Congress passed the Middle-Class Tax Relief and Job Creation Act which included a provision (Section 6409) which mandates the approval of certain eligible wireless facility modifications. The provisions of Section 6409 were further clarified in the FCC's October 17, 2014 Report and Order (FCC-14-153) and again on June 9, 2020 (FCC-20-75) and were specifically designed to accelerate broadband deployment by improving wireless siting policies.

Included as Attachment 5 is a copy of the FCC's licenses issued to Cellco for its wireless services in Connecticut. The FCC's rules permit a licensee to modify its system, including the addition of new cell sites, without prior approval by the FCC, as long as the licensee's authorized service area is not enlarged. The proposed Wilton South Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Wilton South Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Connecticut, Cellco holds FCC Licenses to provide wireless services and intends to deploy its 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3550 MHz and 3600 MHz (5G) frequencies at the Wilton South Facility. Pursuant to its FCC Licenses, Cellco has developed and continues to develop a network of cell sites to serve the demand for enhanced wireless services throughout the nation and more specifically, the State of Connecticut.

Cellco currently provides wireless service in and around the Town of Wilton from seven (7) existing macro-cell sites identified as its Wilton, Wilton 2, Wilton West, Wilton DB, Weston, Silver Hill and East Woods (in Lewisboro, NY) cell sites. Four (4) of the seven (7) existing facilities (Wilton, Wilton 2, Wilton West and Wilton DB) are in the Town of Wilton. All other wireless service in Wilton is provided by wireless facilities in the adjacent towns of New

Canaan, Norwalk, Weston and Ridgefield, Connecticut and Lewisboro, New York.

Wireless service plots showing the extent of wireless service in the area around the proposed Wilton South Facility reveal significant portions of Town where reliable service (service levels greater than or equal to Neg-95 dBm RSRP) is lacking in all of Cellco's operating frequencies. These wireless service deficiencies exist particularly along portions of State Routes 33, 106 and 7, and in the area surrounding the Property, including the Wilton High School, Middlebrook School and Comstock Park. Coverage plots showing Cellco's "existing" wireless service in central and western portions of Wilton and its wireless service with the addition of the proposed Wilton South Facility are included in Attachment 6.

2. Proposed Cell Site Information

The proposed Wilton South Facility would be located in the northwest portion of the Property. The Property is owned by the Town of Wilton. The northwest portion of the Property, across the street from Middlebrook School, is used as a school bus parking lot.

Cellco plans to install twelve (12) panel-type antennas and twelve (12) remote radio heads at the top of the 123-foot tower. Faux tree branches will extend approximately five (5) feet above the top of the tower and will screen Cellco's antennas.³ Equipment associated with Cellco's antennas, including equipment and battery cabinets, a 50-kW propane-fueled backup generator and a 500-gallon propane tank will be installed on concrete pads within the Facility compound. Cellco's equipment cabinet would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The backup battery cabinet and generator will allow the facility to remain operational if commercial power to the Facility is interrupted. The

³ Antennas installed by other wireless carriers will also be screened by lower faux branches. See tower elevation drawing included in Attachment 1.

Facility would remain unstaffed, except as required for maintenance. Once the cell site is operational, Cellco technicians will visit the cell site periodically for maintenance purposes. Cellco's backup generator is exercised twice a month for approximately 20 minutes, during daytime hours.

Vehicular access to the proposed cell site would extend from School Road over a portion of a paved access driveway and school bus parking area. Utilities would extend from existing utility service on the Property and/or existing utility poles along School Road.

Cellco will deploy its 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3550 MHz and 3600 MHz (5G) wireless services at the Wilton South Facility. Coverage from the proposed Wilton South Facility is as follows:

Street Name	700 MHz coverage in mi		850 MHz coverage in mi		1900 MHz coverage in mi		2100 MHz coverage in mi		3550 MHz coverage in mi		3700 MHz coverage in mi	
	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm	RSRP -85 dBm	RSRP -95 dBm
Route 7	2	4	1.3	2.85	0	0.66	0	0.22	0	0	0.36	1.45
Route 33	1.77	3.4	0.85	2.66	0	0.9	0	0.44	0	0	0	1.2
Route 106	0	1.2	0	0.55	0	0	0	0	0	0	0	0
Overall Coverage Footprint (Square Miles)	3.1	8.59	1.9	5.85	0.16	1.43	0.13	1.01	0	0.03	0.36	1.57

Cellco's existing surrounding cell sites that will interact with the proposed Wilton South Facility include: *Wilton* – antennas on a tower at 128 Mather Road in Wilton, located approximately 2.4 miles north of the proposed Wilton South Facility; *Wilton 2* – antennas on a tower at 50 Danbury Road in Wilton, located approximately 2.8 miles south of the proposed

Wilton South Facility; *Wilton West* – antennas on a tower at 160 Deer Road in Wilton, located approximately 3.0 miles northwest of the proposed Wilton South Facility. *Wilton DB* – antennas on the roof of a building inside a flagpole tower 187 Danbury Road in Wilton, located approximately 1.6 miles southwest of the proposed Wilton South Facility. *Weston* – antennas on a tower at 56 Norfield Road in Weston, located approximately 3.0 miles east of the proposed Wilton South Facility. *Silver Hill* – antennas on a tower at 208 Valley Road in New Canaan, located approximately 3.1 miles southwest of the proposed Wilton South Facility. *East Woods* – antennas on a tower at 377 Smith Ridge Road in Lewisboro, New York, located approximately 4.1 miles northwest of the proposed Wilton South Facility.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Wilton South Facility, in particular, have been designed and developed to allow Cellco to achieve and to maintain high quality, reliable wireless service. The system design is capable of orderly expansion and is compatible with other wireless systems. The resulting quality of service compares favorably with the quality of service provided by conventional wireline telephone service. The wireless system is designed to assure a true cellular configuration of base transmitters and receivers in order to cover the proposed service area effectively while providing the highest quality of service possible.

Mobile telephone switching offices (“MTSOs”) in Windsor and Wallingford are interconnected and operate Cellco's wireless systems in Connecticut as a single network, offering the subscriber uninterrupted use of the system while traveling throughout the State. This network is further interconnected with the local exchange company and long-distance carrier networks.

Cellco has designed its wireless system in conformity with applicable standards and

constraints for wireless systems. Cellco's system is also designed to minimize the need for additional cell sites in the absence of additional demand or unforeseen circumstances.

b. Cell Site Equipment

The key elements of the cellular system are the two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller equipment. This equipment is capable of expanding in modules to meet system growth needs. The cell site equipment primarily provides for: message control on the calling channel; call setup and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test commands; data from the mobile or portable unit in both directions and on all channels; scan receiver control; transmission of power control commands; rescanning of all timing; and commands and voice channel assignment.

In addition to the ground-mounted radio equipment, Cellco intends to install up to twelve (12) panel-type transmit/receive antennas; twelve (12) RRHs; two (2) HYBRID fiber optic antenna cables; and a GPS antenna. Backup power to the Wilton South Facility will be provided by a backup battery system and a 50-kW propane-fueled generator. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

4. Technological Alternatives

Pursuant to authorization by the FCC, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no equally effective technological alternatives to the proposal contained herein. In fact, Cellco's wireless system represents state-of-the-art technology offering high-quality service. Cellco is aware

of no viable and currently available alternatives to its system design for carriers licensed by the FCC.

C. Site Selection and Tower Sharing

1. Cell Site Selection

On August 30, 2021, the Town of Wilton issued a request for proposals (“RFP”) for the leasing of real property for the development of a wireless telecommunications facility at the Town’s school bus parking facility across from Millbrook School in the northwest portion of the Property. Cellco determined that the parcel identified by the Town would satisfy its wireless service objectives for its recently established Wilton South search area and responded to the RFP. Cellco’s bid was accepted by the Wilton Board of Selectman at its meeting of November 1, 2021 and the parties executed a Land Lease Agreement for the Wilton South Facility on June 6, 2022. The Town and Cellco hosted a local public information meeting on November 2, 2022 and in response to residents’ concerns for visual impacts of the proposed tower, the Town and Cellco agreed to shift the tower location approximately 175 feet to the south and access the Facility compound directly from the school bus parking lot.⁴ The Wilton Board of Selectman approved an amendment to the existing Land Lease Agreement on March 6, 2023 allowing for the relocation of the tower site and the construction of two new bus parking spaces.⁵

Because the location of the proposed Wilton South Facility was pre-selected and presented through the Town-issued RFP, Cellco did not conduct a separate site search or site selection process. Cellco’s RF Design Engineers determined, early in the RFP process, that the proposed cell

⁴ Access to the Facility compound will require the elimination of two school bus parking spaces adjacent to the compound. Cellco will replace the two school bus parking spaces lost with two new parking spaces in the southwest corner of the existing parking lot.

⁵ A redacted copy of the Amended Land Lease is included in Attachment 17.

site selected by the Town would satisfy its service objectives.

2. Tower Sharing

The Applicant will design the proposed monopole tower and Facility compound to be shared by a four (4) wireless carriers, the Town, as well as local emergency service providers, if a need exists. This type of tower sharing arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future. As of the date of this filing, no other wireless carrier has expressed an interest in the Wilton South Facility.

3. Overall Costs and Benefits

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless service in Wilton.⁶ The Wilton South Facility would be a part of a communications system that addresses the public need identified by the FCC and the United States Congress for high-quality, competitive mobile and portable wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in the future. The overall costs to the Applicant for development of the proposed cell site are set forth in Section III.D. of the Application.

⁶ Businesses and individuals across the country have become much more dependent on wireless services especially in emergency situations. The public safety benefits of wireless telephone service are illustrated by the Connecticut State Police Enhanced 911 emergency calling system. The E-911 emergency calling system is available statewide to all wireless telephone users. Numerous other emergency service organizations have turned to wireless telephone service for use during natural disasters and severe storms when wireline service is interrupted or unavailable.

4. Environmental Compatibility

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the Council is required to find and to determine, among other things, the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflicting with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

a. Primary Facility Impact is Visual

The wireless system of which the proposed Wilton South Facility would be a part has been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower site, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a “sight line” toward the tower. Similarly, visual impact of a tower facility can be further reduced through the use of alternative tower structures; so-called “stealth installations” in appropriate circumstances. Attachment 8 contains a Visual Assessment & Photo Simulations (“Visual Assessment”) prepared by All-Points Technology Corporation (“APT”) for the Wilton South Facility. The Visual Analysis assesses the visual impact of the monopole tower on the surrounding areas and includes photo simulations for the Council’s review and consideration.

According to the Visual Assessment, year-round views of the monopole tower would be limited to areas on or immediately surrounding (within 0.55 miles) the Property. Areas where the top portion of the monopole tower would be visible above the tree canopy comprise approximately

12 acres. Areas of seasonal views (where leaves are off the deciduous trees) would comprise approximately 77 additional acres. Together, the areas where year-round and seasonal views of the tower represent an area that is approximately 89 acres or 1.1% of the 8,042-acre (two-mile radius) study area.⁷

There are three (3) residences within 1,000 feet of the Wilton South Facility. The closest off-site residence is located at 21 Richdale Drive, approximately 440 feet to the northeast and is owned by Emilio Robles and Rene Aldo. There are no schools or commercial day care facilities located within 250 feet of the proposed Wilton South Facility.

b. Environmental Reviews and Agency Comments

Section 16-50j of the General Statutes requires the Council to consult with and to solicit comments on the Application from the Commissioners of the Departments of Energy and Environmental Protection, Public Health, Public Utility Regulatory Authority, Economic Development, and Transportation, the Council on Environmental Quality, and the Office of Policy and Management, Energy Division. In addition to the Council's solicitation of comments, Cellco, as a part of the National Environmental Policy Act ("NEPA") Checklist, solicits comments on the proposed Wilton South Facility from the U.S. Department of the Interior, Fish and Wildlife Service ("USFWS"), Environmental and Geographic Information Center of the Connecticut Department of Energy Environmental Protection ("DEEP") and the Connecticut Historical Commission, State Historic Preservation Officer ("SHPO").

(1) USFWS & NDDB Reviews

According to the USFWS, & NDDB Compliance determination (the "Compliance

⁷ Nearly half of the combined predicted visibility (approximately 43.8% (39 +/- acres)) occurs on Town-owned property.

Determination”) prepared by APT, one federally-listed threatened species is known to occur in the vicinity of the Property, documented as the *Northern Long-Eared Bat* (“NLEB”). For the reasons discussed in the Compliance Determination, Cellco submits that the proposed Wilton South Facility will not adversely affect the NLEB.

The proposed Wilton South Facility would also comply with the USFWS recommended guidelines for reducing impacts to migratory birds. Finally, no known areas of State-listed species are currently depicted on or within 0.25 miles of the most recent DEEP/NDDB maps of the Property. (See Attachment 9).

(2) Wetlands Inspection Report

As discussed in Section III.C.5.d. below, there are two wetland areas in the northwest portion of the Property, one located north of the School bus lot (“Wetland 1”) and one located south of the School bus lot (“Wetland 2”). Both wetlands have the potential to support vernal pool habitat. Wetland 1 is located approximately 330 feet north of the proposed Facility while Wetland 2 is located approximately 105 feet south of the Facility. Since access to the Facility will displace two bus parking spaces, Cellco will construct two new bus parking spaces approximately 120 feet west of Wetland 2. (See Wetlands Inspection Report – Attachment 10). With the Facility being located more than 100 feet from wetlands and outside the potential 100-foot vernal pool envelope (both wetlands potentially support vernal pool habitat) and considering the Facility is located immediately adjacent a school bus parking lot, Cellco does not anticipate that construction activity associated with the Facility will result in a likely adverse impact to these wetland resources. A wetland and if necessary, a vernal pool, protection plan will be implemented as a precautionary measure to avoid the potential for incidental wetland impacts that could occur during construction activities. A

wetland and vernal pool impact analysis will be prepared and provided under separate cover once a vernal pool survey has been completed in April 2023.

(3) State Historic Preservation Officer

According to a Preliminary Historic Resources Determination prepared by APT for the Wilton South Facility, one historic resource, the Wilton Historic District, which is listed on the National Register of Historic Places, is located approximately one-half mile south of the proposed Wilton South Facility. No state-registered sites are located proximate to the Property. (See Attachment 11).

(4) Agriculture

Farmland soils suitable for agricultural use includes land that is defined as prime or farmland of Statewide or local importance, based on soil type. It identifies the location and extent of the most suitable land for producing food, feed, fiber, forage, and oilseed crops and is available for these uses.⁸ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), Prime Farmland Soils exist on the Property to the west, north and east of the School bus lot. Statewide Important Farmland Soils occur in the area to the east and south of the bus lot. (See Farmland Soils Map included in Attachment 12).

c. Radio Frequency Emissions

The FCC has adopted standards for exposure to Radio Frequency (“RF”) emissions from telecommunications facilities like those proposed in the Application. To ensure compliance with the applicable standards, Cellico has performed a Far Field RF Emissions calculation for the Wilton South Facility according to the methodology prescribed by the FCC Office of Engineering and

⁸ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

Technology Bulletin No. 65, Edition 97-01 (August 1997) ("OET Bulletin 65"). The calculation is a conservative, worst-case approximation for RF emissions at the closest accessible point to the antennas, in this case the base of the tower, and assumes that all antennas are transmitting simultaneously, on all channels, at full power. Even under these absolute worst-case conditions, the calculations indicate that the maximum permissible exposure level for Cellco's antennas at the proposed Wilton South Facility would remain well below (6.9%) the FCC's Standard. Actual RF emissions levels from the proposed facility would be far below these "worst-case" calculations. Far Field RF Emission Tables are included in Attachment 13.

d. Other Environmental Issues

No sanitary facilities are required for the Wilton South Facility. The operations at the Wilton South Facility will not cause any significant air, water, noise or other environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the Cellco project team, the Applicant submits that the proposed Wilton South Facility will have no significant adverse effect on scenic, natural, historic or recreational features, and that none of the potential effects alone or cumulatively with other effects is sufficient reason to deny this Application.

5. Consistency with Local Land Use Controls

The Council Application Guide for Community Antenna Television and Telecommunication Facilities, as amended in July 2012, requires the inclusion of a narrative summary of the project's consistency with the Municipality's Plan of Conservation and Development (the "Plan"), Zoning Regulations, and Wetlands Regulations as well as a description of planned and existing uses of the site location and surrounding properties.

a. Planned and Existing Land Uses

The proposed Wilton South Facility would be located in the northwest portion of an approximately 109.27-acre parcel owned by the Town of Wilton. The northwest portion of the Property is zoned Residential - 2A and is used as a school bus parking lot. The Property is surrounded by residential uses to the north, residential and commercial uses to the east, the Middlebrook School to the West and undeveloped Town land to the south.

b. Plan of Conservation and Development

The Town of Wilton Plan of Conservation & Development (the “Plan”), adopted on September 23, 2019, recognizes the benefit a robust telecommunications infrastructure to facilitate achieving development and redevelopment activity in Town. In particular, Goal 7 in the plan recognizes the need for the Town and wireless carriers to work together to provide telecommunication infrastructure to support modern economic, workplace and technological need of Wilton residents. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Wilton Zoning Map, the Property is located in the Town’s Residence 2A (“R-2A”) zone. According to Section 29-H.D.2., Telecommunications Facilities are permitted in all zone districts. The Wilton Zoning Regulations recognize as “Non-Regulated Facilities”, telecommunications facilities regulated under the exclusive jurisdiction of the Council. The zoning regulations restate the Town’s right to pre-application consultation and its right to submit comments and recommendations to Celco and the Council about aspects of the proposed Facility. See also Section III.C.6. below

d. Inland Wetlands and Watercourses Regulations

The Wilton Inland Wetlands and Watercourses Regulations (“Wetlands Regulations”)

define Regulated Area as any activity or operation within or use of a wetland, watercourse or regulated upland area, including that area within 100 feet from a wetland or watercourse or on slopes in excess of 20% within 100 feet of a wetland or watercourse. Regulated activities involving removal or deposition of material, or any obstruction, construction, alteration or pollution, of such wetlands or watercourses. Four (4) copies of the Wilton inland Wetlands and Watercourse Regulations were filed, in bulk, with the Council. APT completed a wetland inspection report and a thorough wetlands investigation to assess and evaluate potential impacts of the proposed Facility on those on-site wetlands. A copy of a Wetlands Inspection Report is included in [Attachment 10](#). A complete wetland impact assessment and vernal pool analysis will be completed later this spring. A complete Impact Analysis will be provided to the Council shortly.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), the Wilton South Facility would be located in Flood Zone X, an area of minimal flooding, outside the 1000year flood zone. A copy of the National Flood Hazard Layer FIRMette map is also included in [Attachment 14](#).

6. Local Input

As mentioned above, the Town of Wilton issued an RFP for the development of the proposed Wilton South tower site in August of 2021. Cellco was the successful bidder in the RFP process and is responsible for proceeding with the proposed tower application to the Council. The Town understands that it was entitled to further review of the Cellco proposal as a part of the Council’s 90-day municipal consultation process. Because the tower location, on the Property was specifically selected by the Town as an appropriate location for the tower site, it was determined that the additional time afforded the municipality to review the proposal, was not necessary. By

letter dated August 19, 2022, the Town agreed to waive the 90-day municipal consultation process (“MCP”) described in Conn. Gen. Stat. Section 16-50l(f). See Attachment 15.

Notwithstanding the Town’s willingness to waive the MCP, technical information was presented to Town Officials and Wilton residents at a public meeting on November 2, 2022. Following this meeting, Cellco agreed to consider shifting the tower site to the south and conduct an additional “crane test” to assess visibility of the proposed tower site from this alternative location. Cellco’s consultants were invited onto several residential properties in the area to assess visual effects from private properties in the area. Following this analysis and in consultation with neighbors and the Town, Cellco determined that it would be willing to relocate the tower site to the proposed location and propose the development of a monopole “tree” tower at the Property to reduce the potential for adverse visual effects on these neighbors.

7. Consultations With State and Federal Officials

Attachments 10, 11, 12, 13, 14 and 16 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Wilton South Facility.

a. Federal Communications Commission

The FCC did not review this particular tower proposal. As discussed above, FCC approval is not required where the authorized service area is not enlarged.

b. Federal Aviation Administration (FAA)

Cellco prepared a Federal Airways & Airspace Summary Report, consistent with FAA Regulations Part 77 Sub-Part C Obstruction Analysis Report, for the proposed Wilton South Facility to determine if the proposed tower would constitute an obstruction or hazard to air navigation. This analysis has confirmed, pursuant to FAA standards and guidelines, that the proposed tower would not constitute an obstruction or hazard to air navigation. Therefore, no obstruction marking, or

lighting would be required. A copy of the Federal Airways & Airspace Analysis report is included in Attachment 16.

c. **United States Fish and Wildlife Service**

See Section III.C.4.b.(1) above.

d. **Connecticut Department of Energy and Environmental Protection**

(1) **Natural Diversity Data Base**

See Section III.C.4.b.(1) above.

(2) **Bureau of Air Management**

Under normal operating conditions, Cellco's equipment at the Wilton South Facility would generate no air emissions. During the loss of commercial power and periodically for maintenance purposes, Cellco would utilize a propane-fueled generator to provide emergency backup power to the proposed cell site. Cellco's backup generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b.

e. **Connecticut State Historic Preservation Officer**

See Section III.C.4.b.(3) above.

D. **Estimated Cost and Schedule**

1. **Overall Estimated Costs**

The total estimated cost of construction for the Wilton South Facility is approximately \$590,000. This estimate includes:

(1) Cell site radio equipment	\$300,000
(2) Tower and Foundation	150,000

(3)	Antenna and Coax	90,000
(4)	Generator.....	25,000
(5)	Miscellaneous (e.g. site preparation, access, grading, utilities)	25,000

2. Overall Scheduling

Site preparation and engineering would commence following Council approval of Cellco's Development and Maintenance ("D&M") Plan and are expected to be completed within two to four weeks. Equipment installation is expected to take an additional four weeks after installation of the building and installation of the tower. Cell site integration and system testing is expected to require two weeks after equipment installation.

IV. CONCLUSION

Based on the facts contained in this Application, Cellco submits that the establishment of the Wilton South Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town as determined by the FCC and the United States Congress, and a competitive framework for providing such service has been established by the FCC and the Telecommunications Act of 1996. Cellco submits that the need far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

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

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS



By: _____

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