STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

September 13, 2024

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
One State Street
Hartford, CT 06103
kbaldwin@rc.com

RE: **DOCKET NO. 515** - The Towers LLC Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located east of the Student Transportation Parking Lot at 180 School Road, Wilton, Connecticut. **D&M Plan Decision.**

Dear Attorney Baldwin:

At a public meeting of the Connecticut Siting Council (Council) held on September 12, 2024, the Council considered and approved the Development and Management (D&M) Plan submitted for this facility on July 15, 2024, with the following conditions:

1. Provide the final details of the tower foundation prior to commencement of construction; and
2. Install a natural gas line connection to fuel the emergency backup generator or provide a complete feasibility analysis and cost comparison in accordance with Condition 2d of the Council's August 18, 2023 Decision and Order for review and approval by the Council prior to the commencement of construction.

This approval applies only to the D&M Plan submitted on July 15, 2024, and other supplemental information received on August 21, 2024. Requests for any changes to the D&M Plan shall be approved by Council staff in accordance with Regulations of Connecticut State Agencies Section (RCSA) §16-50j-77(b).

Furthermore, the Certificate Holder is responsible for compliance with the reporting requirements under RCSA §16-50j-77, including:

1. Contact information for the personnel of the contractor assigned to the project;
2. Notification of commencement of construction;
3. Quarterly construction progress reports;
4. Notification of completion of construction and commencement of operation **along with a representative photograph of the facility**; and
5. Final report.

Please be advised that deviations from the approved D&M Plan and non-compliance with the D&M Plan reporting requirements are enforceable under Connecticut General Statutes §16-50u.

Enclosed is a copy of the staff report for this D&M Plan, dated September 12, 2024.

Thank you for your attention and cooperation.

Sincerely,

Melanie A. Bachman
Executive Director

MAB/IN/laf

Enclosure: Staff Report, dated September 12, 2024

c: Service List, dated April 11, 2024

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

Docket No. 515
The Towers, LLC
180 School Road
Wilton, Connecticut
Development and Management Plan

Staff Report
September 12, 2024

On August 18, 2023, the Connecticut Siting Council (Council) issued a Certificate of Environmental Compatibility and Public Need (Certificate) to Cellco Partnership d/b/a Verizon Wireless (Cellco) for the construction, maintenance, and operation of a 123-foot stealth "tree" monopole (monopine) wireless telecommunications facility to be located at 180 School Road, Wilton, Connecticut.

On March 20, 2024, in compliance with Condition No. 15 of the Council's Decision and Order (D&O), Cellco requested to transfer the Certificate to The Towers LLC (Certificate Holder). The Council approved the transfer of Certificate on April 11, 2024.

As required in the Council's D&O, Certificate Holder submitted a Development and Management (D&M) Plan to the Council on July 15, 2024. Pursuant to Regulations of Connecticut State Agencies (RCSA) §16-50j-75(e), copies of the D&M Plan were also submitted to the service list.

On August 7, 2024, the Council issued interrogatories to Certificate Holder. On August 21, 2024, Certificate Holder submitted responses to the Council's interrogatories.

The tower site is located in the northwestern portion of a 109.27-acre parcel zoned residential and is partially developed with schools, athletic fields and facilities, a community center and a school bus parking lot/depot. Portions of the of the parcel are undeveloped and wooded. The approved facility would be located adjacent to the existing school bus parking lot. Access to the tower site will be from the existing paved driveway and parking lot extending from School Road.

Condition No. 1 of the D&O requires the following:

"The tower shall be constructed as a stealth "tree" monopole (monopine) at a height of 123 feet above ground level to provide the proposed wireless services, sufficient to accommodate the antennas of Cellco Partnership d/b/a Verizon Wireless and other entities, both public and private. The density and configuration of the "tree branches" shall conceal the panel antennas. Panel and whip antennas shall be treated to match the monopine….

In compliance with Condition No. 1 of the D&O, the D&M Plan includes plans and specifications for a 123-foot monopine sufficient to accommodate the antennas of Cellco and other entities, public and private.

Condition No. 2 of the D&O requires the following information to be included in the D&M Plan:

a) Final site plan(s) for development of the facility that employ the governing standard in the State of Connecticut for tower design in accordance with the currently adopted International Building Code and include specifications for the tower, tower foundation, antennas and equipment compound including, but not limited to, fence design, ground equipment, access road, final utility route and installation, and emergency backup power;

Certificate Holder will construct a 123-foot monopine designed in accordance with the EIA/TIA Structural Standards for Steel Antenna Towers and Antenna Supporting Structures-Revision H. It is designed to support four levels of platform-mounted antennas and municipal antennas. The tower foundation can support a 20-foot extension to accommodate future tower sharing.

Based on the geotechnical report, the tower could be supported by either a slab foundation or a drilled pier foundation. The type of foundation to be used will be determined by the contractor. Blasting will not be required. Certificate Holder will retain an engineering firm to oversee the excavation and preparation of the foundation.

Cellco will install 12 panel antennas and 12 remote radio heads on a T-Arm antenna mount at a centerline height of 120 feet above ground level (agl). The 110-foot, 100-foot and 90-foot levels of the tower will be available for future collocation by other tenants.

The tower will be located within a 60-foot by 60-foot compound and lease area. The compound will be enclosed by an eight-foot high chain link fence with a 12-foot wide vehicle access gate.

Cellco will install two equipment cabinets and a 50-kilowatt propane fueled emergency backup generator on an approximate 22-foot by 10-foot concrete pad covered by a steel canopy within the compound. A 1,000-gallon propane tank would be installed on a 5-foot by 18-foot concrete pad in the northeast corner of the compound.

Access to the tower/compound will be from the existing paved driveway within the bus parking lot to the facility compound. Two parking spaces will be converted into a 24-foot wide access drive for the facility compound. Two replacement parking spaces will be constructed in the southwestern corner of the parking lot.

Electrical and telecommunications utilities will extend underground from the utility board to an existing utility pole on the north side of School Road. The utility meter board and pad-mounted transformer, located outside the compound fence, will be protected by bollards.

b) Details of the monopine structure, including, but not limited to, manufacturer, branch pattern, and photographs of other monopine installations that used the selected design;

The tower is designed by Valmont Industries, Inc. and will resemble a pine tree. The tower will have a faux branch pattern of three branches per foot beginning at 39.5 feet agl extending to the top. A tapered faux cone will extend above the monopole for approximately 10 feet for a more natural appearance. Faux branch lengths range from 10 feet long at the 39.5-foot level tapering to 4 feet long at the 122-foot level.

Certificate Holder included a photograph of a 95-foot monopine, designed by Sabre Industries Inc., that was approved by the Council in Docket 498 at 185 Academy Road in Cheshire.

Antennas and associated equipment will be painted brown to match the color of the monopine. Antennas would be equipped with wraps/socks if additional screening is required.

c) Construction plans for site clearing, grading, water drainage and stormwater control, site stabilization measures during construction; and erosion and sedimentation (E&S) controls consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended;

Development of the site will disturb an approximately 0.23-acres. Approximately 10 trees with a diameter of 6 inches or greater at breast height will be removed. Approximately 325 cubic yards of cut and 358 cubic yards of fill will be required to develop the site.

Erosion and sedimentation (E&S) controls will be installed along the southeastern perimeter of the and will comply with the applicable *Connecticut Guidelines for Soil Erosion and Sediment Control*. Disturbed areas will be inspected regularly and stabilized through temporary and permanent seeding and mulching. E&S controls will be inspected and repaired as needed.

The site and access drive are located on relatively level ground. Stormwater runoff within the compound would drain towards the east as a result of the 2% incline of the gravel surface. Post-construction, stormwater will be allowed to sheet flow across the access drive and compound, following natural drainage patterns. The equipment compound's gravel surface would facilitate stormwater infiltration and thus a minimal amount of runoff.

A temporary concrete washout surrounded by staked hay bale barriers and lined with plastic sheeting would be installed on the outside western corner of the compound and used to capture and collect water.

A temporary soil stockpile area will be located to the southeast of the compound area, surrounded by E&S controls.

The nearest wetland is approximately 105 feet to the south of the facility site.

d) Feasibility of a natural gas connection for the emergency backup generators and a cost comparison between natural-gas fueled and diesel-fueled emergency backup generation;

Certificate Holder does not have sufficient information from the natural gas service provider (Eversource) about the existing service main and its specific installation requirements. Certificate Holder estimates that the cost to extend natural gas supply to the approved facility would exceed the cost of the proposed propane fuel tank and its installation.

e) Implementation of USFWS Northern Long-eared Bat conservation measures;

Certificate Holder will adhere to the US Fish and Wildlife Service (USFWS) recommended tree clearing restriction from June 1-July 31 and April 1-October 31 to reduce impact to northern long-eared bat that may utilize the site. An environmental monitor will conduct contractor training on identification and reporting of rare species. Certificate Holder would maintain dead trees (snags) and large trees when possible and use herbicides and pesticides only if unavoidable. Permanent lighting will not be installed except for a work light for the equipment cabinets that is operated by motion or a timer switch.

f) Implementation of Wetland and Vernal Pool Protection Plan;

Certificate Holder will implement a wetland protection plan during construction that includes E&S controls, wetland restoration measures, an independent environmental compliance monitor to ensure erosion and sedimentation control measures are installed and maintained, contractor training, provisions for fuel storage and spill remediation, herbicide, pesticide and salt restrictions, and site inspection reporting.

A portion of the underground utility conduit route is located within the 100-foot wetland buffer to the east and southeast of the compound. Certificate Holder will implement Best Management Practices to prevent unintentional impacts to wetland habitats during construction.

g) Construction schedule including hours and days of the week for construction activities;

Construction hours will be from 7:00 a.m. to 6:00 p.m., Monday through Saturday.

Construction of the site is anticipated to begin immediately upon D&M Plan approval with completion in the first quarter of 2025.

Condition No. 4 of the D&O requires the following:

"Prior to the commencement of operation, the Certificate Holder shall provide the Council with a rigorous cumulative far-field radio frequency analysis for the facility that accounts for all entities on the tower, a 6-foot tall person at ground level and the actual antenna pattern for antennas on the facility with a cumulative percent maximum permissible exposure at or below 100 percent, consistent with FCC, Office of Engineering and Technology, Bulletin No. 65, August 1997…."

In accordance with Condition No. 4, Certificate Holder shall provide its final calculated cumulative far-field worst-case modeling of radio frequency power density for all entities on the tower prior to commencement of operation.

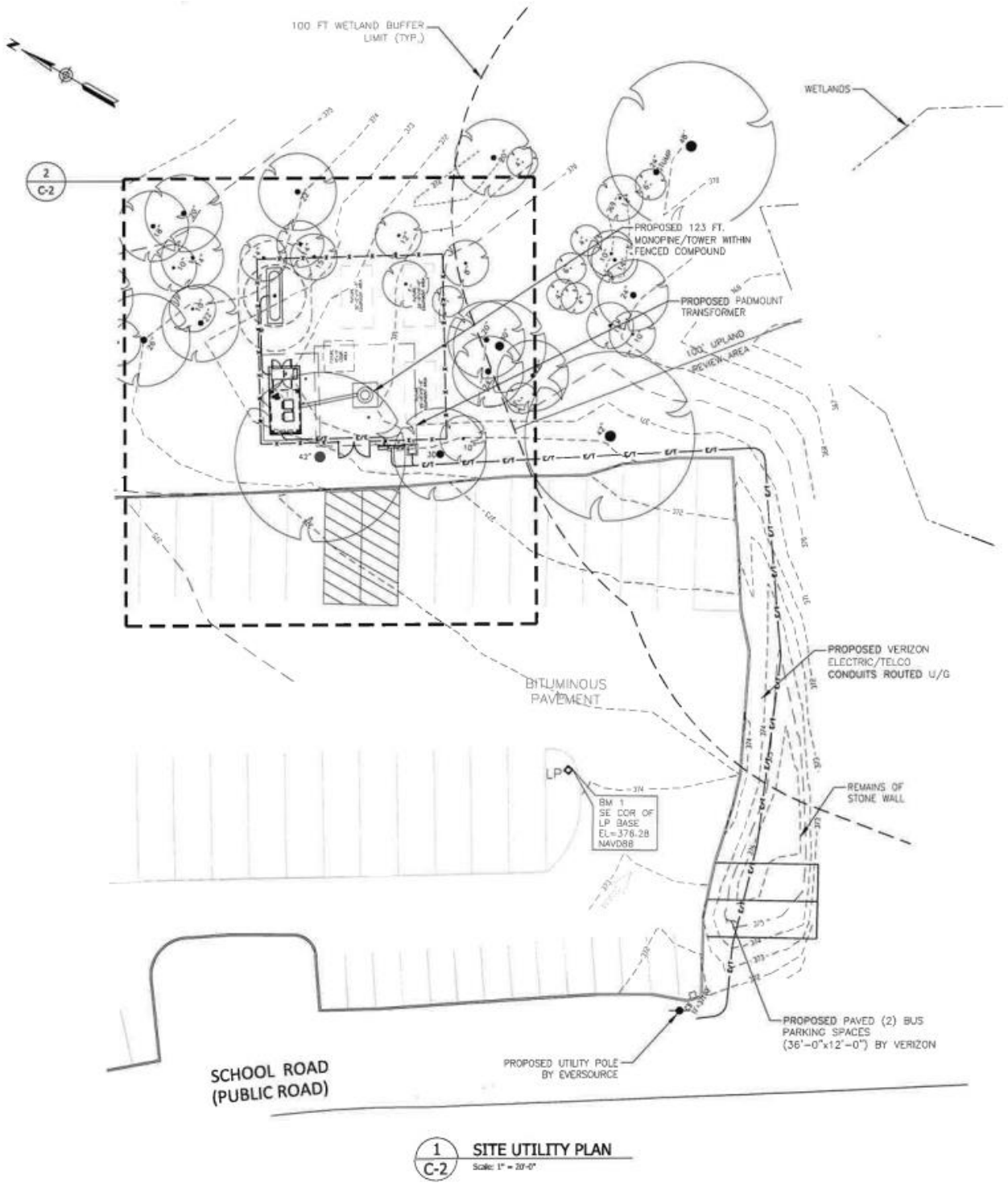
Conclusion

The D&M Plan is consistent with the Council's D&O for Docket No. 515.

If approved, staff recommends the following condition:

1. Provide the final details of the tower foundation prior to commencement of construction.

D&M Construction Site Plan



Compound Plan