

Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



**BROADBROOK RELO
11 CHAMBERLAIN ROAD
EAST WINDSOR, CONNECTICUT**

DOCKET NO. _____

OCTOBER 26, 2023

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EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) currently maintains antennas and related equipment on an existing abandoned water tank in the southerly portion of a 10.9-acre parcel at 11 Chamberlain Road in East Windsor, Connecticut (collectively the “Property”). The Property and the existing water tank are owned by Nutrien Ag Solutions, Inc. f/k/a Crop Production Services Inc. The water tank currently supports Cellco antennas at a height of 116-feet above grade and T-Mobile antennas at a height of 104 feet above grade. Cellco identifies the existing water tank facility as its “Broadbrook Facility”.

To improve wireless service in the area around the Property, Cellco determined that certain upgrades to its existing Broadbrook cell site were needed. As is always the case, during the initial phase of the upgrade process, Cellco’s project engineers analyzed the existing water tank and determined that the structure was not capable of supporting the existing T-Mobile installation and Cellco’s proposed facility upgrades, prompting Cellco to consider the development of a new tower to replace the existing water tank facility. The new tower is the subject of this Application and is identified as Cellco’s “Broadbrook Relo Facility”.

The Broadbrook Relo Facility would be located in the northeast portion of the Property. At this location, Cellco proposes to construct a 120-foot monopole tower within a 50’ x 50’ fenced compound and 100’ x 100’ leased area. Cellco would install up to twelve (12) panel-type antennas and twelve (12) remote radio heads on an antenna platform at a centerline height of 115 feet above ground level (“AGL”). A radio equipment cabinet, backup battery cabinet and a diesel-fueled backup generator will be located on the ground within the facility compound, near the base of the tower. Vehicular access to the Broadbrook Relo Facility would extend from

Chamberlain Road along a new gravel access driveway to the compound. Electric and fiber optic service to the new tower site would extend from existing utility service along Chamberlain Road.



Legend

- ⊗ Site
- ◻ Subject Property
- Approximate Parcel Boundary

Map Notes:
 Base Map Source: CT ECO 2019 Imagery
 Map Scale: 1 inch = 500 feet
 Map Date: October 2023



Site Location Map

Proposed Wireless
 Telecommunications Facility
 Broadbrook RELO CT
 11 Chamberlain Road
 East Windsor, Connecticut





Legend

- Proposed Verizon Wireless Lease Area
- Proposed Verizon Wireless Compound
- Proposed Verizon Wireless Equipment
- Proposed Verizon Wireless Gravel Access Drive
- Subject Property
- Approximate Parcel Boundary

Map Notes:
 Base Map Source: 2019 CT Aerial Imagery (CTECO)
 Map Scale: 1 Inch = 200 feet
 Map Date: April 2023



Site Schematic

Proposed Wireless
 Telecommunications Facility
 Broadbrook RELO CT
 11 Chamberlain Road
 East Windsor, Connecticut



**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP 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 11 CHAMBERLAIN ROAD IN EAST WINDSOR, CONNECTICUT	:	DOCKET NO. ____
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	:	OCTOBER 26, 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 on a 10.9-acre parcel at 11 Chamberlain Road in East Windsor, Connecticut (the “Property”).

As background, Cellco currently maintains antennas and related equipment on an existing (abandoned) water tank in the southerly portion of the Property. The Property and the existing water tank are owned by Nutrien Ag Solutions, Inc. f/k/a Crop Production Services Inc. The

water tank is currently shared by Cellco, with antennas at the 116-foot level, and T-Mobile, with antennas at the 104-foot level on the tank. Cellco identifies the existing water tank facility as its “Broadbrook” cell site.

To improve wireless service in the area around the Property, Cellco determined that certain upgrades to its existing Broadbrook cell site were needed. During the initial phase of the Broadbrook Facility upgrade evaluation process, Cellco’s structural engineers determined that the existing water tank was not structurally capable of supporting the existing T-Mobile installation and Cellco’s proposed facility upgrades, prompting Cellco to pursue the development of a new tower to replace the existing water tank facility.¹ Cellco identifies the new tower site as its “Broadbrook Relo Facility”.

The Broadbrook Relo Facility would be located in the northeast portion of the Property. At this location, Cellco proposes to construct a 120-foot monopole tower within a 50’ x 50’ fenced compound (100’ x 100’ leased area). Cellco would install antennas, remote radio heads and related equipment on an antenna platform at a height of 115 feet above ground level (“AGL”). Radio equipment cabinets, including a backup battery cabinet and a diesel-fueled backup generator will be located within the facility compound, near the base of the tower. Vehicular access to the Broadbrook Relo Facility would extend from Chamberlain Road along a new gravel access driveway to the facility compound. Electric and fiber optic service would extend from existing utility service along Chamberlain Road.

Included in this Application as Attachment 1 is a factual summary and project plans for the proposed Broadbrook Relo Facility. This summary, along with the other attachments submitted as

¹ Cellco’s engineering analysis also included an evaluation of whether the existing water tank could be reinforced to support Cellco’s facility upgrades. Cellco quickly determined however, that reinforcing the existing water tank would present significant challenges and be cost prohibitive.

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: Aleksey (Alex”) Tyurin, 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 Broadbrook Relo 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 16-50I(b)

Copies of this Application have been mailed to municipal, regional, state, and federal officials, pursuant to C.G.S. Section 16-50I(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 October 23 and 24, 2023, by Cellco in the *Hartford Courant* pursuant to C.G.S. Section 16-50I(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 in the Town's Land records as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50I(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 Broadbrook Relo 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 requirements 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 policy² 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.³

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 Broadbrook Relo Facility would not enlarge Cellco’s authorized service area.

² Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

³ FCC Declaratory Ruling WT Docket No. 08-165.

B. Public Need and System Design

1. Need for the Broadbrook Relo 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 and 2100 MHz frequencies at the Broadbrook Relo 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 East Windsor from eight (8) existing macro-cell sites including its existing Broadbrook cell site and cell sites identified as, East Windsor North, East Windsor 2, East Windsor, South Windsor North, South Windsor NE, Vernon 3 and Ellington DT facilities. Five (5) of the eight (8) existing facilities (Broadbrook, East Windsor, East Windsor 2, East Windsor North, and South Windsor North) are all located in the Town of East Windsor. All other wireless service in East Windsor is provided by wireless facilities in the adjacent towns of South Windsor, Windsor, Windsor Locks, Enfield, Ellington, and Vernon.

Coverage plots in each of Cellco's operating frequencies (700 MHz, 850 MHz, 1900 MHz, and 2100 MHz), showing Cellco's existing wireless service in East Windsor, (1) with the existing Broadbrook (water tank) Facility, (2) with the proposed Broadbrook Relo Facility; and (3) existing coverage without either the Broadbrook Facility or the Broadbrook Relo Facility are included in Attachment 6.

In all frequency ranges, the Broadbrook Relo Facility will allow Cellco to provide for

reliable wireless service to a large area around the Property including some areas where service is non-existent today. The Broadbrook Relo facility will also provide some limited capacity relief to Cellco's existing East Windsor and South Windsor North cell sites.

The proposed Broadbrook Relo Facility tower would be located in the northeast portion of the Property. The Property is owned by Nutrien Ag Solutions, Inc. f/k/a Crop Production Services, Inc. At this location, Cellco plans to construct a 120-foot monopole tower and install twelve (12) panel-type antennas and twelve (12) remote radio heads at the top of the tower, at a centerline height of 115 feet AGL. Cellco will also install equipment and battery cabinets and a 50-kW diesel-fueled backup generator on concrete pads within the fenced 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 Broadbrook Relo Facility to remain in operation if commercial power to the Facility is interrupted. The Facility would remain unstaffed, except as required for maintenance. Once 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 Chamberlain Road over a new gravel access driveway. Utilities would extend from existing utility service along Chamberlain Road.

Cellco will deploy its 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3550 MHz and 3600 MHz (5G) wireless services at the Broadbrook Relo Facility. Coverage from the proposed Broadbrook Relo 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	
	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 191	0.1	0.9	0.1	0.8	0	0	0	0
Chamberlain Road	0.9	1.5	0.8	1.3	0.9	1.1	0.8	0.9
Rye Street	1.4	2.0	1.4	1.9	0.3	0.8	0.1	0.6
Overall Coverage Footprint (Square Miles)	1.8	5.5	1.2	5.0	0.7	2.4	0.4	1.2

Cellco’s existing surrounding cell sites that will interact with the proposed Broadbrook Relo Facility include: *East Windsor* – antennas on a tower at 236 South Main Street in East Windsor, located approximately 3.5 miles southwest of the proposed Broadbrook Relo Facility; *East Windsor 2* – antennas on a water tank at 104 Prospect Hill Road in East Windsor, located approximately 3.3 miles northwest of the proposed Broadbrook Relo Facility; *East Windsor North* – antennas on a water tank at 41 Depot Street in East Windsor, located approximately 1.4 miles north of the proposed Broadbrook Relo Facility. *South Windsor North*– antennas on the water tank at 50 Plantation Road in East Windsor, located approximately 1.8 miles south of the proposed Broadbrook Relo Facility. *South Windsor NE* – antennas on a water tank at 2990 Ellington Road in South Windsor, located approximately 3.4 miles southeast of the proposed Broadbrook Relo Facility. *Vernon 3* – antennas on a tower at 208 Valley Road in New Canaan, located approximately 3.4 miles southeast of the proposed Broadbrook Relo Facility. *Ellington DT* – antennas in a church steeple at 72 Main Street, in Ellington CT, located approximately 4.2 miles east of the proposed Broadbrook Relo Facility.

2. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Broadbrook Relo 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 Broadbrook Relo Facility will be provided by a backup battery system and a 50-kW diesel-fueled generator within the fenced facility compound. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

3. 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

Cellco's goal in selecting cell sites, like the one described above, is to locate a facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact. Cellco has determined that the proposed Broadbrook Relo Facility would satisfy this goal and provide high-quality reliable wireless service that, at a minimum replicates the service provided by the existing Broadbrook Facility.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area established by Cellco's Radio Frequency (RF) Engineers and network designers. In this case, because Cellco needs a new facility to replace the existing Broadbrook water tank facility, the site search focused initially on the Property as the alternative that would allow Cellco to maintain or improve upon the wireless service provided today. Once the Property owner confirmed that it was willing to lease additional space on the Property to Cellco for a new tower site, the search for alternative locations ended.

2. Tower Sharing

The Applicant will design the proposed tower and compound to be shared by up to four (4) wireless carriers, the Town, as well as local emergency service providers, if a need exists. This type of tower and facility 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, T-Mobile has confirmed its interest in relocating from the existing water tank to the new Broadbrook Relo 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 East Windsor.⁴ The Broadbrook Relo Facility would be a

⁴ 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.

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.

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 Broadbrook Relo 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 can be further reduced through the use of alternative tower structures; so-called “stealth installations” in appropriate circumstances. Attachment 8 contains a Visibility Analysis prepared by All-Points Technology Corporation (“APT”) for the Broadbrook Relo Facility. The Visibility Analysis

assesses the visual impact of the tower on the surrounding areas and includes photo simulations for the Council's review and consideration.

According to the Visibility Analysis, year-round views of the monopole tower would be limited to open fields within one mile of the Broadbrook Relo Facility. Seasonal views of the monopole would not extend beyond a radius of approximately one mile from the tower site. The combined predicted visibility associated with the Broadbrook Relo Facility totals approximately 354 acres or 4.4% of the two-mile radius study area. Seasonal visibility accounts for approximately 78% (276 acres) of that predicted visibility.

There are no residences within 1,000 feet of the Broadbrook Relo Facility. The closest off-site residence (not an abutting property) is located at 79 Rye Street, approximately 1,075 feet to the north and is owned by Ronald Russo. There are no schools or commercial day care facilities located within 250 feet of the proposed Broadbrook Relo 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 Broadbrook Relo 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 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, and as confirmed by the USFWS proposed Broadbrook Relo Facility will not adversely affect the NLEB.

The proposed Broadbrook Relo 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 is a small wetland area in the northwest portion of the Property (“Wetland 1”). According to the attached Wetland Inspection Report and Wetland and Vernal Pool Assessment this wetland has the potential to support vernal pool habitat. Wetland 1 is located approximately 260 feet west of the proposed Broadbrook Relo Facility. With the Facility being located more than 100 feet from the on-site wetland area and outside the potential 100-foot vernal pool envelope, Cellco does not anticipate that construction activity associated with the Broadbrook Relo 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 area also exists along the south side of Chamberlain Road approximately 65 feet southeast of the site access road. (See Wetlands Inspection and Wetland and Vernal Pool Assessment Reports – Attachment 10).

(3) **State Historic Preservation Officer**

According to a Preliminary Historic Resources Determination prepared by APT for the Broadbrook Relo Facility, no historic resources listed on or eligible for the National Register of Historic Places are located within one-half mile of the proposed Broadbrook Relo 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.⁵ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), Prime Farmland Soils exist in the north and eastern portions of the Property. Statewide Important Farmland Soils occurs in the northeast corner of the Property. The proposed Broadbrook Relo Facility compound will be outside these areas of Prime and Statewide Important farmland soils. (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, Cellco has performed an RF Exposure calculation using a Far Field formula for the Broadbrook Relo Facility according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) (“OET

⁵ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

Bulletin 65”). The calculation is a conservative, worst-case approximation for RF emissions at various locations around 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 Broadbrook Relo Facility would remain well below (9.4%) 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 Broadbrook Relo Facility. The operations at the Broadbrook Relo 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 Broadbrook Relo 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 Broadbrook Relo Facility would be located in the northeast portion of the Property owned by Nutrien Ag Solutions, Inc. f/k/a Crop Production Services, Inc. The Property is zoned M-1 Manufacturing and is used for light manufacturing purposes. The Property is surrounded by M-1 zoned land and sand/gravel mining operations to the north, south and west, a gravel mining operation and rail line to the west and residential and agricultural uses to the east.

b. Plan of Conservation and Development

The Town of East Windsor 2016 Plan of Conservation & Development (the “Plan”) encourages the Town to stay current on regulations for wireless communications, acknowledges the authority of the Council and encourages the Town to develop a Town-wide utility infrastructure plan, including telecommunications and fiber installation. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the East Windsor Zoning Map, the Property is located in the Town’s M-1 Manufacturing zone. Section 804, Wireless Telecommunications Sites established location preferences for the siting of new wireless facilities, including existing structures or building, existing towers less 60 feet in commercial and industrial zones and towers taller than 60 feet in commercial and industrial zones. Four (4) copies of the East Windsor zoning Regulation are filed in bulk with the Council.

d. Inland Wetlands and Watercourses Regulations

The East Windsor Inland Wetlands and Watercourses Regulations (“Wetlands Regulations”) define Regulated Activity as any operation within or use of a wetland, watercourse or that area within 150 feet (“upland review area”) from 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 East Windsor 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. Copies of a Wetlands Inspection report and Wetland and Vernal Pool Assessment is included in Attachment 10. The proposed facility compound is located approximately 260 feet to the nearest on-site wetland and approximately 65 feet to the closest off-site wetland south of Chamberlain Road. Four (4) copies of the East Windsor Zoning Regulations were filed in bulk.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), the Broadbrook Relo Facility would be located in Flood Zone X, an area of minimal flooding, outside the 100-year flood zone. A copy of the National Flood Hazard Layer FIRMette map is also included in Attachment 14.

6. Local Input

Section 16-50l(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On June 1, 2023, Cellco representative commenced the ninety (90) day municipal consultation process. First Selectman Bowsza received a copy of the technical information summarizing Cellco’s plans to establish a telecommunications facility at the Property. Four (4) copies of Cellco’s Technical Report were filed in bulk with the Council.

Since the filing of the Technical Report, Cellco’s representative attempted to contact Mr. Bowsza to discuss the tower proposal and answer any questions. Mr. Bowsza did not respond to Cellco’s outreach efforts.

7. **Consultations With State and Federal Officials**

Attachments 9, 10, 11, 12, 13, 14 and 15 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Broadbrook Relo Facility.

a. **Federal Communications Commission**

The FCC did not review this 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 Broadbrook Relo 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 15.

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 Broadbrook Relo Facility would generate no air emissions. During the loss of commercial power and periodically for

maintenance purposes, Cellco would utilize a diesel-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 Broadbrook Relo Facility is approximately \$625,000. 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)	60,000

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 Broadbrook Relo 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 Broadbrook Relo Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS



By: _____

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