

Connecticut Siting Council

APPLICATION OF
GLOBAL SIGNAL ACQUISITIONS IV LLC
AND
CROWN CASTLE TOWERS 06-02 LLC

EAST HAMPTON RELO FACILITY
LAKEVIEW STREET
EAST HAMPTON, CONNECTICUT

DOCKET NO. _____

AUGUST 26, 2020

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY.....	i
SITE LOCATION MAP	ii
AERIAL PHOTOGRAPH	iii
I. INTRODUCTION.....	1
A. Authority and Purpose	1
B. The Applicant.....	3
C. Application Fee.....	3
II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50 <u>l</u> (b)	4
III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES INFORMATION	4
A. Federal Policy	4
B. Public Need and System Design	7
1. Need for the East Hampton Relo Facility	7
2. Cell Site Information.....	7
3. Cell Site Equipment.....	8
4. Technological Alternatives	8
C. Site Selection and Tower Sharing.....	9
1. Cell Site Selection.....	9
2. Tower Sharing.....	9
3. Overall Costs and Benefits.....	10
4. Environmental Compatibility.....	10
a. Primary Facility Impact is Visual.....	11
b. Environmental Reviews and Agency Comments.....	12
c. Non-Ionizing Radio Frequency Radiation	14
d. Other Environmental Issues	14
5. Consistency with Local Land Use Controls.....	15
a. Planned and Existing Land Uses.....	15
b. Plan of Conservation and Development	15
c. Zoning Regulations.....	15
d. Inland Wetland and Watercourse Regulations.....	16

TABLE OF CONTENTS
(continued)

	Page
6. Local Input	17
7. Consultations With State and Federal Officials.....	17
a. Federal Communications Commission	18
b. Federal Aviation Administration	18
c. United States Fish and Wildlife Service	18
d. Connecticut Department of Energy and Environmental Protection	18
e. Connecticut State Historic Preservation Officer	19
D. Estimated Cost and Schedule.....	19
IV. CONCLUSION	19

LIST OF ATTACHMENTS

1. East Hampton Relo Facility – Factual Summary and Project Plans
2. Certificate of Service of Application on Government Officials and List of Officials Served
3. Legal Notice in the *Middletown Press*
4. Notice to Landowners; List of Abutting Landowners; Certificate of Service
5. RF Design Analysis – Existing and Proposed Service
6. Site Search Summary
7. Visual Assessment
8. Preliminary USFWS & CTDEEP Compliance Determination
9. Wetlands Inspection
10. Preliminary Historic Resources Determination
11. Farmland Soils Map
12. RF Safety and NIER Analysis Report
13. Special Flood Hazard Area Analysis
14. Airspace Safety Analysis and Compliance (ASAC) Site Specific Evaluation Report
15. Redacted Land Lease Agreement with Richard Anderson

EXECUTIVE SUMMARY

Global Signal Acquisitions IV LLC and Crown Castle Towers 06-02 LLC (“Crown” or “Applicant”), proposes to construct a telecommunications tower and related improvements (the “East Hampton Relo Facility”) in the northerly portion of an approximately 17.37-acre parcel off Lakeview Street in East Hampton, Connecticut (the “Property”). The Property is owned by Richard Anderson. The East Hampton Relo Facility will replace the existing Crown tower at 94 East High Street which will need to be relocated when the existing ground lease for this tower site expires.¹ The replacement facility will continue to be shared by Sprint, Verizon Wireless, AT&T and T-Mobile (collectively, the “Wireless Carriers”). The existing tower will be removed as a part of the tower relocation project.

Crown plans to construct a 250-foot monopole tower at the Property. The proposed East Hampton Relo Facility would be shared by Sprint at the 246-foot level; Verizon at the 234-foot level, AT&T at the 222-foot level and T-Mobile at the 210-foot level on the replacement tower. Equipment associated with the Wireless Carriers facilities will be located concrete pads near the base of the tower, within a fenced facility compound. Vehicular and utility access to the tower site would extend from the East High Street over a new gravel driveway extending through an adjacent parcel owned by Crown’s landlord, a distance of approximately 1,366 feet to the compound.

¹ Crown acquired the 94 East High Street tower from Sprint. The current ground lease for Crown’s East High Street tower site is due to expire in June of 2021. Crown has been engaged in negotiations with the landowner at 94 East High Street for the last 18 months. The parties, however, have been unable to finalize an agreement to extend the term of the existing lease. To avoid the disruption of service to Crown’s tenants on the East High Street tower, Crown had no choice but to pursue an alternative tower location and to have that new tower approved and constructed prior to the expiration of the existing tower lease.



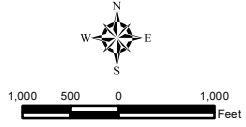
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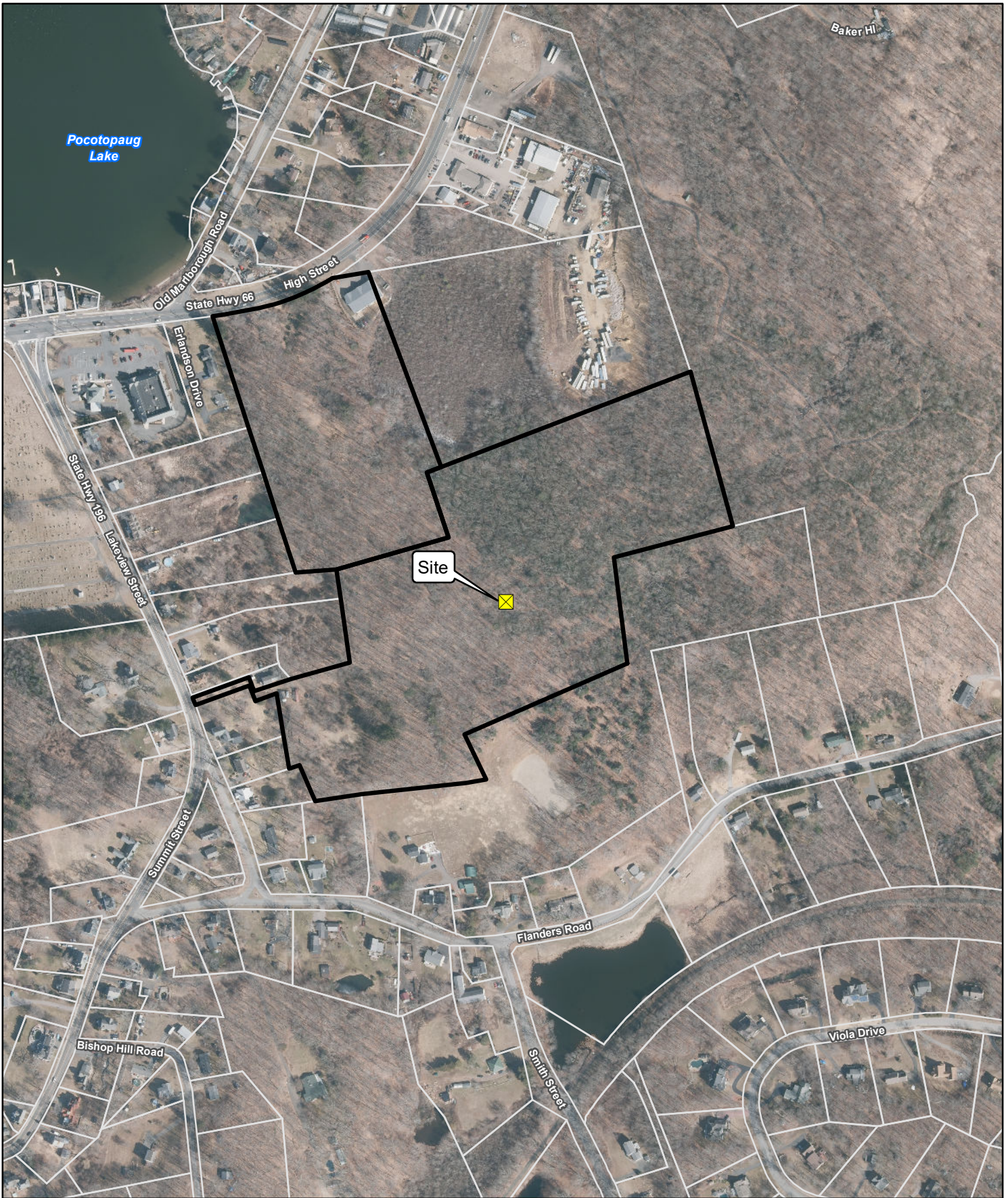
- Legend**
- Site
 - Municipal Boundary

Site Location Map




Proposed Wireless
Telecommunications Facility
Site Number 876352
8 1/2 Lakeview Street
East Hampton, Connecticut

Map Notes:
Base Map Source: USGS 7.5 Minute Topographic
Quadrangle Maps, Middle Haddam, CT (1984)
and Moodus, CT (1973)
Map Date: June 2020

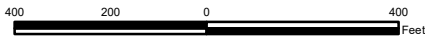




Legend

-  Site
-  Subject Property
-  Approximate Parcel Boundary (CTDEEP)

Map Notes:
 Base Map Source: CT ECO 2019 Imagery
 Map Scale: 1 inch = 400 feet
 Map Date: June 2020



Site Location Map

Proposed Wireless
 Telecommunications Facility
 Site Number 876352
 8 1/2 Lakeview Street
 East Hampton, Connecticut



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF GLOBAL SIGNAL : DOCKET NO. ____
ACQUISITIONS IV LLC AND CROWN : :
CASTLE TOWERS 06-02 LLC FOR A : :
CERTIFICATE OF ENVIRONMENTAL : :
COMPATIBILITY AND PUBLIC NEED FOR : :
THE CONSTRUCTION, MAINTENANCE : :
AND OPERATION OF A WIRELESS : :
TELECOMMUNICATIONS FACILITY OFF : :
LAKEVIEW STREET, CONNECTICUT : AUGUST 26, 2020

**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 Global Signal Acquisitions IV LLC and Crown Castle Towers 06-02 LLC (“Crown” or “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 Applicant 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 an approximately 17.37-acre parcel at off Lakeview Street in East Hampton, Connecticut (Parcel ID: 26-85-25), (the “Property”). The Property is owned by Richard Anderson. Mr. Anderson owns and resides on an adjacent 0.19-acre parcel which maintains a mailing address of 8 ½ Lakeview Street. This site is known as Crown’s “East

Hampton Relo Facility”.

The proposed East Hampton Relo Facility would be located in the central portion of the Property. At this location, Crown would construct a 250-foot self-supporting monopole tower within a 75' x 75' fenced compound and 100' x 100' leased area. Sprint would attach antennas and related equipment to an antenna platform at the 246-foot level on the tower.² The top of Sprint's antennas would not extend above the top of the tower. Verizon would attach antennas and related equipment to an antenna platform at the 234-foot level on the tower. AT&T would attach antennas and related equipment to an antenna platform at the 222-foot level on the tower. T-Mobile would attach antennas and related equipment to an antenna platform at the 210-foot level on the tower. Radio equipment, battery cabinets and back-up generators (if necessary) would be located on concrete pads near the base of the tower and within the facility compound. Vehicular access to the tower site would extend from East High Street over an adjacent 7.63-acre parcel also owned by Richard Anderson. Accessing the Property from the north will allow Crown and the Wireless Carriers to avoid any unnecessary traffic or construction related impacts on the residences along Lakeview Street. The new gravel driveway will extend approximately 1,366 feet to the facility compound. Utilities will also extend from existing service along East High Street.

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

² It remains unclear how the recent merger of Sprint with T-Mobile might affect the current plan to relocate Sprint antennas onto the proposed East Hampton Relo Facility tower.

B. The Applicant

Crown maintains an administrative office located at 3 Corporate Park Drive, Suite 101, Clifton Park, NY 12065. The Wireless Carriers are all licensed by the Federal Communications Commission (“FCC”) to operate wireless telecommunications systems in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Crown has extensive national experience in the development and construction of wireless infrastructure as well as the operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public.

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

Crown Castle
3 Corporate Park Drive, Suite 101
Clifton Park, NY 12065
Attention: Pascelle Saint-Laurent
Pascelle.SaintLaurent@crowncastle.com; and
Jason Mayo
Jason.Mayo@crowncastle.com

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

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(860) 275-8345
Attention: Kenneth C. Baldwin, Esq.
kbaldwin@rc.com

C. Application Fee

The estimated total construction cost for the East Hampton 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 16-50(b)

Copies of this Application have been sent to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50(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 Crown's intent to submit this Application was published on August 20 and 21 2020, by Crown in the Middletown Press pursuant to C.G.S. Section 16-50(b). A copy of the published legal notice is included as Attachment 3. An Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Crown'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 16-50(b), as well as a list of the landowners to whom such notice was sent and a sample notice letter.

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

The purpose of this section is to provide an overview and general description of the proposed East Hampton Relo Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the "Act"). (Pub. L. No. 104-104, 110 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, including facility siting, in order 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, in order 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, the Wireless Carriers currently operate wireless systems throughout Connecticut. These systems have been designed and constructed to operate as integrated, contiguous systems, consistent with business policies 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 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 the Wireless Carriers, and other carriers maintain a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued President 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 policy³ to ensure that all Americans would have access to broadband capability, whether wired or wireless; to establish the United States as a leader in wireless service innovation; and to 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.⁴ 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 No. 14-153) and were specifically designed to accelerate broadband deployment by improving the efficiencies of the wireless facility siting process.

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, by doing so, the licensee's authorized service area is not enlarged. The use of the East Hampton Relo Facility would not enlarge authorized service areas for the Wireless Carriers.

³ Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

⁴ FCC Declaratory Ruling WT Docket No. 08-165.

B. Public Need and System Design

1. Need for the East Hampton Relo Facility

As noted above, the Act has pre-empted, generally, any state or local determination of public need for wireless services. The Wireless Carriers hold FCC Licenses to provide wireless services in Connecticut and nationwide and each currently provides service to significant portions of East Hampton from the existing Crown facility at 94 East High Street and other tower locations in the Town. This existing Crown facility consists of a 120-foot monopole tower within a fenced equipment compound. Due to some significant topographic changes in ground elevation in this portion of the Town, the proposed East Hampton Relo tower will extend to a height of 250 feet above grade to meet the same overall antenna height requirements of the Wireless Carriers⁵.

Coverage maps showing wireless service in East Hampton from the existing 94 East High Street tower and the proposed service from the relocated tower site at the Property are included in an RF Design Analysis prepared by Wireless Network Consulting in Attachment 5.

2. Cell Site Information

The proposed East Hampton Relo Facility will provide reliable wireless service comparable to that which each of the Wireless Carriers provide from the existing 94 East High Street facility. (*See Coverage Plots in Attachment 5*). Within the coverage footprint of each Wireless Carrier are portions of Routes 66, 196 and 16, as well as local roadways and commercial and residential land uses.

The East Hampton Relo facility tower and compound have been designed to

accommodate each of the Wireless Carriers, as well as state or local emergency services antennas and equipment, if a need exists. The facility compound would house each of the Wireless Carriers' radio and related equipment, including receiving, transmitting, switching, processing and performance monitoring equipment. The tower and associated wireless equipment would be enclosed by a 6-foot high security fence and gate with one-foot of barbed wire at the top.

3. Cell Site Equipment

As describe above, the Wireless Carriers would install transmit/receive antennas on the tower at various heights. In addition. ground-mounted radio equipment and a back-up power supplies would be located within the secure East Hampton Relo Facility compound.

4. Technological Alternatives

Pursuant to its FCC licenses, the Wireless Carriers are each authorized to provide wireless telecommunications services throughout the State of Connecticut. Crown and the Wireless Carriers submit that there are no equally effective technological alternatives that would allow Crown and the Wireless Carriers to provide its wireless services to the area than those described in this Application. In fact, the wireless systems described in this Application represents state-of-the-art technology offering high-quality wireless service. Crown is aware of no viable and currently available alternatives to its system design for carriers licensed by the FCC.

⁵ The ground elevation at the existing 94 East High Street site is approximately 688' AMSL, 165' higher than the ground elevation at the East Hampton Relo Facility site location.

C. Site Selection and Tower Sharing

1. Cell Site Selection

Crown's goal in selecting the cell site described above, is to locate a facility in such a manner as to allow the Wireless Carriers to build and to operate a high-quality wireless system with the least environmental impact. Crown has determined that the proposed East Hampton Relo Facility satisfies this goal and would help enhance its wireless service in the area, provide high-quality reliable wireless service along portions of Routes 66, 196 and 16, as well as local roads and in the surrounding commercial and residential areas around the Property.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area or ring. In this case, because the tower would replace the existing tower at 94 East High Street, the search was limited to a small search area near the existing tower site. Crown investigated a total of eleven (11) alternate locations and selected the Property at off Lakeview Street as a viable candidate for development. Crown determined that a tower height of 250 feet at the Property would be necessary satisfy the Wireless Carriers service requirements (coverage and capacity). The Site Search Summary (Attachment 6) together with the site information contained in Attachment 1 support Crown's position that the site selected represents a feasible alternative of the sites investigated.

2. Tower Sharing

The Applicant will design the permanent tower and compound to be shared by the Wireless Carriers, and the Town, or local emergency service providers, if a need exists. The tower itself can also be designed to be extended in accordance with past requests from the Council. This type of tower sharing arrangement would reduce, if not eliminate, the need for the Wireless Carriers or

municipal entities to develop a separate tower in this same area in the future.

3. Overall Costs and Benefits

Aside from the visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed East Hampton Relo Facility. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless services in East Hampton. The East Hampton Relo 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 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 East Hampton 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, 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. Attachment 7 contains a Visual Resource Evaluation (“Visual Evaluation”) prepared by All-Points Technology Corporation (“APT”) for the East Hampton Relo Facility. The Visual Evaluation assesses the visual impact of the proposed 250-foot tower on the surrounding areas and includes photographic simulations for the Council’s review and consideration.

According to the Visual Evaluation, areas where the top portion of the tower would be visible above the tree canopy comprise approximately 443 acres or 5.5% of the 8,042-acre study area. Approximately 410 of the 443 acres of year-round visibility, however, occurs over the open water of Lake Pocotopaug to the north of the East Hampton Relo Facility. When the leaves are off the trees, seasonal views, through intervening trees and branches are anticipated to occur in some locations within an additional 239-acre area around the tower site.

The closest off-site residential use is located approximately 730 feet to the west, Crown’s landlord’s residence at 8 ½ Lakeview Street. There are no schools or commercial daycare facilities within 250 feet of the East Hampton Relo Facility. The Applicant may, if requested by the Council, raise balloons with a diameter of at least three (3) feet at the East Hampton Relo Facility location

prior to or on the day of the Council’s hearing on this Application, or at a time otherwise specified by the Council.

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 Utilities 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, Crown, as a part of the National Environmental Policy Act (“NEPA”) Checklist, solicits comments on the proposed cell site 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 & CTDEEP NDDB Reviews

According to the USFWS & CTDEEP Compliance Determination prepared by APT, one federally-listed Threatened species, the *Northern Long-Eared Bat* (“NLEB”), is known to occur in the vicinity of the proposed East Hampton Relo Facility. APT conducted an evaluation to determine if the proposed East Hampton Relo Facility would impact the NLEB. A complete description of the APT evaluation, including voluntary conservation measures designed to reduce potential impacts are discussed in the USFWS & CTDEEP Compliance Determination – Attachment 8. Further, according to the most recent CTDEEP NDDB maps, the proposed East Hampton Relo Facility is not located within a shaded NDDB buffer area. Therefore, the proposed

East Hampton Relo Facility is not anticipated to adversely impact any federal or state threatened, endangered or special concern species.

(2) **Wetlands Investigation**

As discussed in Section III.C.5.d. below, the development of the East Hampton Relo Facility will have no direct impact on wetlands or watercourses. Crown identified two wetlands on the Property. A portion of the proposed access driveway may come within 40 feet of Wetland 1 and within 105 feet of Wetland 2. The perimeter fence of the proposed East Hampton Relo Facility compound will be located approximately 355 feet from the closest portion of Wetland 1. Crown does not anticipate that the development of the proposed East Hampton Relo Facility will adversely impact these wetland resources. *See* Wetland Inspection report is included in Attachment 9.

(3) **State Historic Preservation Officer**

According to a Preliminary Historic Resources Determination prepared by APT, a portion of the Belltown Historic District, a resource listed on the National Register of Historic Places, is located within one-half mile of the proposed East Hampton Relo Facility. Based on the results of a visual evaluation, no views of the proposed East Hampton Relo Facility will occur within this portion of the historic resource. A copy of APT's Preliminary Historic Resources Determination is included in Attachment 10.

(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.⁶ According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), the Property does not contain any “Prime Farmland” soils. As mentioned above and as shown on the project drawings included in Attachment 1, access to the East Hampton Relo Facility will extend through the adjacent parcel to the north of the Property also owned by Richard Anderson. This adjacent parcel contains some areas of Statewide Important Farmland soils. (See Farmland Soils Map included in Attachment 11).

c. Non-Ionizing Radio Frequency Radiation

The FCC has adopted a standard for exposure to Radio Frequency (“RF”) emissions from telecommunications facilities like those proposed in this Application. To ensure compliance with the applicable standards, Crown’s consultant, Biwabkos Consultants, LLC, prepared an RF Safety and NIER Analysis Report (“RF Compliance Report”) for the proposed East Hampton Relo Facility according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) (“OET Bulletin 65”). The RF Compliance Report confirms that the East Hampton Relo Facility will be compliant with the FCC Standards. A copy of the RF Compliance Report is included in Attachment 12.

d. Other Environmental Issues

No sanitary facilities are required for the East Hampton Relo Facility. The operations at the approved East Hampton 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 Crown project team, the Applicant submits that the East Hampton Relo Facility will have no significant adverse effect on

⁶ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

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 Town's Plan of Conservation and Development (the "Plan"), Zoning Regulations and Wetland Regulation, 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 East Hampton Relo Facility is located on an approximately 17.37-acre parcel owned by Richard Anderson. The Property is located in the R-4 (Residential) zoning district and is undeveloped.

b. Plan of Conservation and Development

The Town of East Hampton Plan of Conservation & Development dated July 1, 2016 (the "Plan"), under the caption, "Ensure Adequacy of Other Utility Services" discusses wireless communications facilities providing reliable wireless service town-wide. The Plan recognizes the jurisdiction of the Council and encourages the Town to take a proactive role in the Council's tower siting process. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Town's Zoning Map, the Property is located in the R-4 (Residential) zone. Pursuant to Section 8.7 of the East Hampton Zoning Regulations, wireless telecommunications facilities are permitted in the R-4 zone subject to the approval of a special

permit from the East Hampton Planning and Zoning Commission. The regulations require that: no towers shall be located within 200 feet of any existing buildings; a tower must be able to accommodate a minimum of three (3) carriers; and all equipment structures must meet the height and setback requirements of the zone. Four (4) copies of the Zoning Regulations were filed, in bulk, with the Council.

d. Inland Wetland and Watercourse Regulations

The East Hampton Inland Wetlands and Watercourses Commission Regulations (the “IWWC Regulations”) define Regulated Activity as any operation within, or use of, a wetland or watercourse (the “Regulated Area”) involving removal or deposition of materials, or any obstruction, construction, alteration or pollution of such areas. The definition of Regulated Area also includes any area within 100 feet of a wetland or watercourse; any area within 150 feet of the Salmon River or the Connecticut River; and any area within 200 feet of a wetland or watercourse in the Lake Pocotopaug watershed area. Four (4) copies of the IWWC Regulations were filed, in bulk, with the Council.

Dean Gustafson, Professional Soil Scientist with APT, conducted a field investigation and completed a Wetland Inspection report for the proposed East Hampton Relo Facility. The closest wetland area (Wetland 1) is approximately 355 feet north of the facility compound and approximately 40 feet east of the proposed access driveway. Wetlands 1 and 2 are located within the Lake Pocotopaug Watershed Area. The Wetland Inspection report is included in Attachment 9.

In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council for Soil and Water Conservation, adequate and appropriate soil erosion and

sedimentation control measures will be established and maintained throughout the cell site construction period. In addition, the Applicant will employ appropriate construction management practices to ensure that no pollutants would be discharged to any nearby watercourse or wetland areas or to area groundwater during the construction process.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Map Number 09007C0155G (Effective August 28, 2008) the proposed facility would be located flood hazard Zone X, an area outside the 500-year flood zone. A copy of the FIRM is included in Attachment 13.

6. Local Input

Section 16-50l(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On February 12, 2020, Crown representatives met with David Cox, East Hampton’s Town Manager to commence the ninety (90) day municipal consultation process. The Town received copies of technical information summarizing Crown’s plans to establish a telecommunications facility as described above. At this meeting, Crown discussed, in detail, the aspects of the proposed East Hampton Relo Facility, the site location being considered, the need for wireless service improvements in East Hampton and the Connecticut Siting Council application process.

At the request of the Town, Crown investigated several alternative parcels in the area around the Property. Each of these alternative sites are discussed in the Site Search Summary included in Attachment 6.

7. Consultations With State and Federal Officials

Attachments 9, 10, 11, 12, 13 and 14 and Section III.C. of the Application describes

consultations with state and federal officials and or agencies regarding the proposed East Hampton Relo Facility.

a. Federal Communications Commission

FCC approval of a particular tower site is not required where the authorized service area of the licensed carrier is not enlarged. The FCC did not, therefore, review this particular proposal.

b. Federal Aviation Administration

Crown prepared an ASAC Site Specific Evaluation for the proposed East Hampton Relo Facility. This evaluation confirms that, pursuant to FAA standards and guidelines, the proposed tower would not constitute a hazard to air navigation at the proposed height. However, because the tower exceeds 200 feet in height, obstruction marking and lighting of the tower will be required. A copy of the ASAC evaluation is included in Attachment 14.

c. United States Fish and Wildlife Service

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

d. Connecticut Department of Energy and Environmental Protection

(1) Environmental and Geographic Information Center

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

(2) Bureau of Air Management

Under normal operating conditions, the telecommunications equipment at the East Hampton Relo Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, one or more of the Wireless Carriers may utilize generators to provide emergency back-up power. The generators 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, and therefore is exempt from general air permit requirements.

c. Connecticut State Historic Preservation Officer

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

D. Estimated Cost and Schedule

Site preparation and engineering would commence following Council approval of Crown's Development and Maintenance ("D&M") Plan and are expected to be completed within two to four weeks. Due to the delivery schedules of the manufacturers, installation of the building and installation of the tower are expected to take an additional two to four weeks. Equipment installation is expected to take an additional two 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. Crown estimates that the total cost to construct the new tower site, install all facility compound improvements and construct a the access driveway would be approximately \$ 1,500,000.

IV. CONCLUSION

Based on the facts contained in this Application, Crown submits that the establishment of the East Hampton Relo Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town of East Hampton and throughout Middlesex County, 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. Crown submits that the need for these services, in general, and the East Hampton Relo Facility, in particular, far outweighs any possible environmental effects

resulting from the construction of the proposed cell site.

WHEREFORE, Crown respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed East Hampton Relo Facility.

Respectfully submitted,

CROWN CASTLE TOWERS 06-02 LLC

By: _____

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