

# Connecticut Siting Council

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APPLICATION OF CELLCO PARTNERSHIP  
D/B/A VERIZON WIRELESS

**verizon<sup>v</sup>**

PLATTSVILLE RELO  
5151 PARK AVENUE  
FAIRFIELD, CONNECTICUT

DOCKET NO. \_\_\_\_\_

OCTOBER 15, 2020

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## LIST OF ATTACHMENTS

1. Plattsville 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 *Connecticut Post*
4. Notice to Landowners; List of Abutting Landowners; Certificate of Service
5. Federal Communications Commission Licenses
6. Coverage Maps – Location of Plattsville Relo and Surrounding Cell Sites
7. Antenna and Equipment Specifications
8. Site Search Summary
9. Visual Assessment & Photo-Simulations
10. USFWS and CT DEEP Compliance Determination
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14. Farmland Soils Map
15. General Power Density Table
16. FEMA – Flood Insurance Rate Maps
17. Public Information Meeting Legal Notice and Abutters List
18. FAA Obstruction Analysis Report

## EXECUTIVE SUMMARY

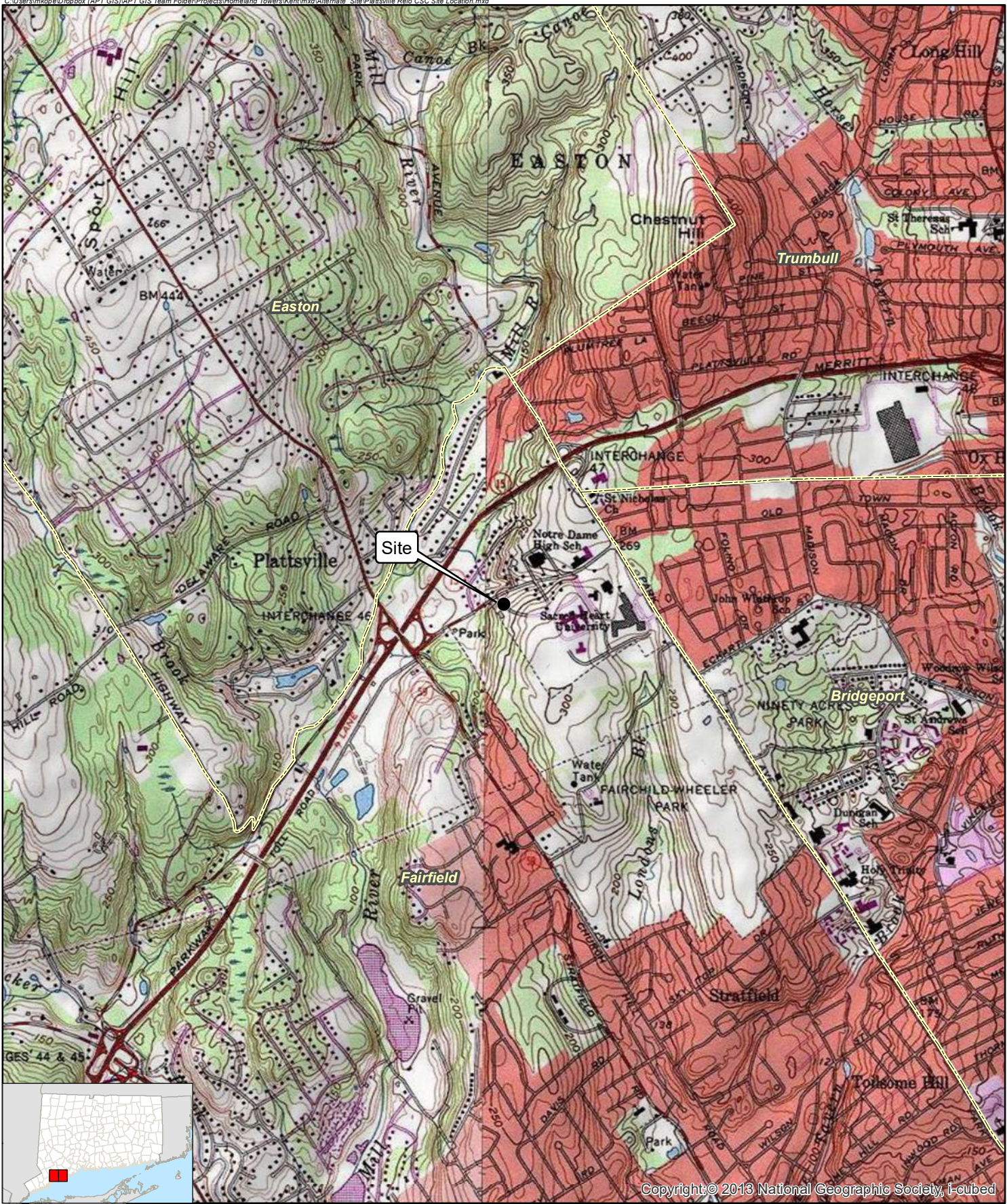
Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 60.2-acre parcel at 5151 Park Avenue in Fairfield, Connecticut (collectively the “Property”). The Property is owned by the Bridgeport Roman Catholic Diocesan Corporation, is leased to Sacred Heart University Incorporated and is a portion of the main campus for Sacred Heart University (“SHU”). Cellco refers to this cell site as its “Plattsville Relo Facility”.

Since 1997, Cellco has maintained a wireless facility on the roof of Pierre Toussaint Hall (formerly the Jewish Home), a residential dormitory building in the center of the SHU main campus. The existing facility provides wireless service to the SHU campus, commercial and residential land uses around the campus, a significant portion of the Merritt Parkway, and the Fairchild Wheeler Golf Course. SHU recently notified Cellco of its desire to remove all wireless facilities from the roof of Toussaint Hall. The Plattsville Relo Facility has been designed to replace the wireless service currently provided by the Toussaint Hall roof-top facility. In addition, the Plattsville Relo Facility will provide improved wireless voice and data services in northeast Fairfield, and portions of Easton, Trumbull and Bridgeport, Connecticut.

Cellco proposes to construct a 130-foot monopole tower within a 50' x 50' fenced compound (50' x 80' leased area) in the northwest corner of the Property. Cellco would install twelve (12) panel-type antennas and nine (9) remote radio heads at the top of the tower. The top of Cellco's antennas will extend above the top of the tower to a height of approximately 133 feet above ground level. Radio equipment cabinets, a propane-fueled backup generator and a propane fuel tank would be located on the ground within a fenced facility compound. Vehicular access to

the Plattsville Relo Facility would extend from Jefferson Street over an existing driveway immediately west of the new SHU maintenance facility. Utilities would extend from existing service on the Jefferson Street to the cell site.





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**Legend**

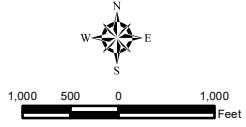
- Site
- ▭ Municipal Boundary

**Site Location Map**

Proposed Wireless  
Telecommunications Facility  
Plattsville Relo CT  
5151 Park Avenue  
Fairfield, Connecticut






Map Notes:  
Base Map Source: USGS 7.5 Minute Topographic  
Quadrangle Maps, Bridgeport, CT (1984) and Westport, CT (1975)  
Map Scale: 1:24,000  
Map Date: February 2020



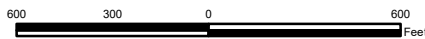




**Legend**

-  Site
-  Subject Property
-  Municipal Boundary

*Map Notes:*  
 Base Map Source: CT ECO 2019 Imagery  
 Map Scale: 1 inch = 600 feet  
 Map Date: February 2020



**Site Location Map**

Proposed Wireless  
 Telecommunications Facility  
 Plattsville RELO CT  
 5151 Park Avenue  
 Fairfield, Connecticut





**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**IN RE:** :  
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 :  
**APPLICATION OF CELLCO PARTNERSHIP** : **DOCKET NO. \_\_\_\_\_**  
**D/B/A VERIZON WIRELESS FOR A** :  
**CERTIFICATE OF ENVIRONMENTAL** :  
**COMPATIBILITY AND PUBLIC NEED FOR** :  
**THE CONSTRUCTION, MAINTENANCE** :  
**AND OPERATION OF A WIRELESS** :  
**TELECOMMUNICATIONS FACILITY AT** :  
**5151 PARK AVENUE IN FAIRFIELD,** :  
**CONNECTICUT** : **OCTOBER 15, 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 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 in the northwest portion of the main campus of Sacred Heart University (“SHU”), 5151 Park Avenue in

Fairfield, Connecticut (collectively the “Property”)<sup>1</sup>. Cellco identifies this cell site as its “Plattsville Relo Facility”. The proposed Plattsville Relo Facility will consist of a 130-foot monopole tower within a 50’ x 50’ fenced compound and 50’ x 80’ leased area. Cellco would install its antennas and remote radio heads at the top of the tower. Radio equipment associated with the antennas and a 30-kW propane-fueled backup generator will be installed on a concrete pad near the base of the tower. A propane fuel tank will also be installed within the fenced compound.

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

**B. The Applicant**

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

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<sup>1</sup> The Property is a 60.2-acre parcel that makes up a portion of the SHU main campus. The SHU Main Campus consists of five separate parcels totaling approximately 85-acres. Three of the five parcels are owned by Sacred Heart University Inc. The remaining two parcels are owned by the Bridgeport Roman Catholic Diocesan Corporation and are leased to SHU for its use.



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: Anthony Befera  
Principle Engineer – Real Estate/Regulatory

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

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

**C. Application Fee**

The estimated total construction cost for the Plattsville 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 16-50l(b)**

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

Notice of Cellco's intent to submit this Application was published on October 8 and 9, 2020, by Cellco in the *Connecticut Post* pursuant to C.G.S. Section 16-50l(b). A copy of the legal notice is included in Attachment 3. A copy of an Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Cellco's intent to file this Application

was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50**l**(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 Plattsville 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 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 requirement in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco's system throughout its New England and national markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

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

In December of 2009, President Obama issued Presidential Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy<sup>2</sup> 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

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

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.<sup>3</sup>

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 were specifically designed to accelerate broadband deployment by improving wireless siting policies.

Included as Attachment 5 is a copy of the FCC's authorization issued to Cellco for its wireless service 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 Plattsville Relo Facility would not enlarge Cellco's authorized service area.

**B. Public Need and System Design**

**1. Need for the Plattsville 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 in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. 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.

Since 1997, Cellco has been providing wireless service in northeast Fairfield, the SHU

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<sup>3</sup> FCC Declaratory Ruling WT Docket No. 08-165.



main campus, portions of northwest Bridgeport, and southerly portions of Easton and Trumbull from its existing Plattsville Facility, a wireless facility on the roof of the Pierre Toussaint Residence Hall (formerly the “Jewish Home” building) in the middle of the SHU main campus. The building roof-top is managed by Message Center Management (“MCM”) through a roof-top license agreement between MCM and SHU. The wireless carriers that share the building roof-top have entered into separate sub-license agreements with MCM. The term of the roof-top license agreement between SHU and MCM will expire on January 13, 2022. Cellco’s sub-license agreement with MCM expired in September of 2017. Cellco continues to maintain wireless service from the existing roof-top pursuant to the hold over provisions in its license agreement with MCM.

Citing access and security concerns, in June of 2018, SHU notified Cellco and MCM of its desire to remove all wireless service equipment from the roof of the Pierre Toussaint Residence Hall. At that time, SHU stated clearly that it does not intend to renew or extend its existing roof-top license agreement with MCM. To avoid the significant disruption to its network services caused by the elimination of the existing Plattsville Facility, Cellco began its search for a replacement facility and has been working with SHU to identify a location for a replacement facility on the SHU owned or controlled properties.

Like the existing Plattsville Facility, the proposed Plattsville Relo Facility will interact with Cellco’s existing Trumbull Center, Trumbull S3, Trumbull SW, North Bridgeport, Bridgeport NW, Fairfield, Fairfield South, Bridgeport NW 2 and Easton cell sites. Plots showing the extent of reliable wireless service in Cellco’s 700 MHz and 2100 MHz frequency ranges from

the existing Plattsville Facility are included in Attachment 6.<sup>4</sup> These existing plots also reveal a large area, to the north of the Plattsville Facility, where gaps in reliable wireless service exist in Cellco's 700 MHz and 2100 MHz frequency ranges. Also included in Attachment 6 are coverage plots depicting wireless service from Cellco's surrounding cell sites together with the service from the proposed Plattsville Relo Facility. These plots show how the Plattsville Relo Facility will provide service comparable to the existing Plattsville Facility and provide additional service to those existing service gaps located to the north in the Towns of Easton and Trumbull.

In addition to the wireless service (coverage) benefits, the Plattsville Relo Facility will also provide much-needed capacity relief to Cellco's existing Bridgeport NW 2 cell site (Gamma sector antennas) and Fairfield South cell site (Alpha sector antennas) both of which are operating beyond their existing capacity limits. It is also important to note that the existing Plattsville Facility is currently operating at 200% of its existing capacity limits on the Gamma sector and 100% of capacity on the Alpha sector.

## **2. Proposed Cell Site Information**

The proposed Plattsville Relo Facility would be located in the northwest portion of the Property. At this site, Cellco would construct a 130-foot self-supporting monopole telecommunications tower within a 50' x 50' fenced compound and 50' x 80' leased area. Cellco would install a total of twelve (12) panel-type antennas and nine (9) remote radio heads at the top of the tower. Cellco's antennas will extend approximately three (3) feet above the top of the tower. Equipment associated with Cellco's antennas, a 30-kW propane-fueled backup

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<sup>4</sup> Cellco's existing Plattsville Facility does not currently provide service in its 850 MHz and 1900 MHz frequency ranges. This service would be provided, however, from the Plattsville Relo Facility.

generator and a propane fuel tank would be located on the ground near the base of the tower. Cellco's equipment cabinets would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The backup battery system and generator will allow the facility to remain operational if commercial power to the facility is interrupted. The equipment would remain unstaffed, except as required for maintenance. Once the cell site is operational, Cellco technicians will visit the cell site periodically for maintenance purposes. Cellco's backup generator is exercised once every two (2) weeks for approximately 30 minutes, and always during daytime hours.

Vehicular access to the proposed cell site would extend from Jefferson Street over an existing driveway a distance of approximately 175 feet to the cell site. Utilities will extend from existing service along Jefferson Street.

Cellco will deploy its 700, 850, 1900 and 2100 MHz wireless services at the Plattsville Relo Facility. The proposed Plattsville Relo Facility would provide reliable wireless service to a 2.16 mile portion of Route 15; a 1.36 mile portion of Route 59 (Easton Turnpike) and an overall area of 4.9 square miles at 700 MHz frequencies; a 2.1 mile portion of Route 15; a 1.3 mile portion of Route 59 (Easton Turnpike) and an overall area of 4.0 square miles at 850 MHz frequencies; a 0.64 mile portion of Route 15; a 0.49 mile portion of Route 59 (Easton Turnpike) and an overall area of 0.76 square miles at 1900 MHz frequencies; and a 0.55 mile portion of Route 15; a 0.33 mile portion of Route 59 (Easton Turnpike) and an overall area of 0.63 square miles at 2100 MHz frequencies.

Cellco's existing surrounding cell sites that will interact with the proposed Plattsville Relo include: *Fairfield* – antennas on an existing tower at 281 Woodhouse Avenue in Fairfield,

located approximately 2.5 miles southwest of the proposed Plattsville Relo Facility; *Trumbull Center*- antennas on an existing water tank off Monitor Hill Road in Trumbull, located approximately 2.75 miles north of the proposed Plattsville Relo Facility; *Trumbull South 3* – antennas on an existing tower at 158 Edison Road in Trumbull, located approximately 1.75 miles northeast of the proposed Plattsville Relo Facility; *Trumbull SW* – antennas on an existing tower at 38 Kaechele Place in Bridgeport, located approximately 1.6 miles east of the proposed Plattsville Relo Facility; *North Bridgeport* – antennas on an existing tower at 1330 Chopsey Hill Road in Bridgeport, located approximately 2.5 miles east of the proposed Plattsville Relo Facility; *Bridgeport NW* – antennas on the roof of a building at 3885 Main Street in Bridgeport, located approximately 2.0 miles southeast of the proposed Plattsville Relo Facility; *Bridgeport NW 2* – antennas on a building at 3200 Park Avenue in Bridgeport, located approximately 2.0 miles south of the proposed Plattsville Relo Facility; *Fairfield South* – antennas on the roof of a building at 2228 Black Road Turnpike in Fairfield, located approximately 2.7 miles south of the proposed Plattsville Relo Facility; and *Easton* – antennas on a tower at 515 Morehouse Road in Easton, located approximately 2.2 miles northwest of the proposed Plattsville Relo Facility.

### **3. System Design and Cell Site Equipment**

#### **a. System Design**

Cellco's wireless system in general and the proposed Plattsville 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 twelve (12) panel-type transmit/receive antennas; nine (9) remote radio heads (RRHs); two (2) HYBRIFLEX™ fiber optic antenna cables; and a GPS antenna. Backup power to the Plattsville Relo Facility will

be provided by a backup battery system and a 30-kW propane-fueled generator. Specifications for Cellco's antennas, RRHs, and generator are included in Attachment 7.

#### **4. Technological Alternatives**

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

#### **C. Site Selection and Tower Sharing**

##### **1. Cell Site Selection**

Cellco's goal in selecting cell sites, like the ones 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 Plattsville Relo Facility would satisfy this goal and provide high-quality reliable wireless service along portions of Route 15 and local roads, the SHU campus, as well as residential and commercial land uses in the area around the SHU campus.

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 any search area, Cellco first examines the use of existing towers or other sufficiently tall structures that might help satisfy its coverage objectives. A list of existing towers or other non-tower structures considered is described above and included in

Attachment 8. Cellco currently shares each of these existing towers, all of which are within approximately four (4) miles of the Plattsville Relo Facility location. These existing sites are identified on the coverage maps included in Attachment 6. The adjacent cell sites cannot, however, satisfy the coverage objectives for the Plattsville Relo Facility search area.

Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No such non-tower structures of suitable height exist in northeasterly portions of Fairfield. As mentioned above, Cellco initiated a site search process for the Plattsville Relo Facility in 2018 after learning that SHU would not extend its existing roof-top management agreement with MCM. Cellco worked closely with SHU to identify alternative tower locations on the Property. Cellco determined that an antenna centerline height of 130 feet at the proposed tower location would satisfy its wireless service objectives in the area. The Site Search Summary (Attachment 8) together with the site information contained in Attachment 1 support Cellco's position that the site selected represents the most feasible alternative of the sites investigated.

## **2. Tower Sharing**

The Applicant will design the proposed tower and facility compound to be shared by a minimum of four (4) wireless carriers, the Town, and local emergency service providers, if a need exists. The tower itself could also be designed to be extended up to 20 feet in accordance with past requests from the Council. This type of tower sharing arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future. As of the date of this filing, no other wireless carrier or the Town of Fairfield has expressed any interest in the Plattsville 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 Fairfield and portions of Bridgeport, Trumbull and Easton Connecticut.<sup>5</sup> The Plattsville 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 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 Plattsville Relo Facility would be a part has

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<sup>5</sup> 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.



been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower site, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a “sight line” toward the tower. Similarly, visual impact of a tower facility can be further reduced through the use of alternative tower structures; so-called “stealth installations” in appropriate circumstances. Attachment 9 contains a Visibility Analysis prepared by All-Points Technology Corporation (“APT”) for the Plattsville 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, areas where the monopole tower would be visible above the tree canopy comprise approximately 26 acres, less than one percent of the two-mile radius (8,042 acre) study area. Year-round visibility of the Plattsville Relo Facility tower are limited to locations within approximately 0.4 miles of the tower. Areas where seasonal views (including views through trees in the winter months) would comprise approximately 49 additional acres, less than one percent of the 8,042-acre study area.

There are 40 residences within 1,000 feet of the Plattsville Relo Facility. The closest off-site residence is located at 392 Jefferson Street, approximately 275 feet to the north and is owned by Joshua and Melinda Prince.

**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 Plattsville 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, Migratory Birds & NDDB Reviews**

According to the May 20, 2020 USFWS & NDDB 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, Cellco submits that the proposed Plattsville Relo Facility will not adversely affect the NLEB.

The proposed Plattsville Relo Facility would also comply with the USFWS recommended guidelines for reducing impacts to migratory birds. Finally, no known areas of State-listed species exist on the most recent DEEP/NDDDB maps in the location of the proposed cell site. (*See Attachment 10*).

**(2) Wetlands Inspection Report**

As discussed in Section III.C.5.d. below, Cellco identified one wetland area proximate to the Plattsville Relo Facility, approximately 23 feet to the south. This wetland consists of a

constructed “wet” stormwater basin and is man-made. The Cellco facility is down-gradient of this wetland area and therefore, development of the proposed tower site will likely not impact this wetland area. (See Wetlands Inspection Report – Attachment 11).

**(3) Avian Resources Evaluation**

According to an Avian Resources Evaluation completed by APT, no migratory bird species will be impacted by the proposed Plattsville Relo Facility. The Plattsville Relo Facility is also not proximate to any Important Bird Areas and complies with the USFWS Guidelines for minimizing the potential impact on bird species. APT’s Avian Resources Evaluation – Attachment 12.

**(4) State Historic Preservation Officer**

According to a Preliminary Historic Resources Determination prepared by APT for the Plattsville Relo Facility, there is one resource, the Merritt Parkway, a National Scenic Byway, that is located within one-half mile of the proposed Plattsville Relo Facility. Based on the results of a visual assessment, isolated, primarily seasonal views, from select locations may occur of the proposed tower. (See Attachment 13).

**(5) 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.<sup>6</sup> According to the National Cooperative Soil Survey (U.S. Department of Agriculture, Natural Resources Conservation Service), no Prime Farmland Soils nor Statewide Important Farmland Soils exist on the Property. None of these areas will, therefore, be impacted by

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<sup>6</sup> Connecticut Environmental Conditions Online (CTECO Resource Guide) [www.cteco.uconn.edu](http://www.cteco.uconn.edu).

construction of the Plattsville Relo Facility. (See Farmland Soils Map included in Attachment 14).

**c. Non-Ionizing Radio Frequency Radiation**

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 a general power density calculation for the proposed Plattsville 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 calculation is a conservative, worst-case approximation for RF emissions at the closest accessible point to the antennas, in this case the base of the tower, and assumes that all antennas are transmitting simultaneously, on all channels, at full power. Even under these absolute worst-case conditions, the calculations indicate that the maximum permissible exposure level for Cellco’s antennas at the proposed Plattsville Relo Facility would remain well below (47.01%) the FCC’s Standard. Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations. A worst-case General Power Density table is included in Attachment 15.

**d. Other Environmental Issues**

No sanitary facilities are required for the Plattsville Relo Facility. The operations at the Plattsville 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 Plattsville 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 Plattsville Relo Facility would be located in the northwest corner of the approximately 80.1-acre SHU main campus. The Property is zoned Residential (R-3). The Property is surrounded by the Fairchild Wheeler Golf Course to the south and west, commercial and residential uses to the east and residential and educational uses to the north.

**b. Plan of Conservation and Development**

The Town of Fairfield Plan of Conservation & Development (Dated September 2007) (the "Plan"), does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. The Plan does, however, identify as one of the its "infrastructure" policies to promote, where feasible, the consolidation of wireless facilities on to common towers and/or the use of existing or proposed buildings or structures. (*See* Goal 5, Policy 36 of the Plan). Four (4) copies of the Plan were filed, in bulk, with the Council.

**c. Zoning Regulations**

According to the Fairfield Zoning Map (dated January 30, 2018), the Property is located in the R-3 Residential zone. Wireless telecommunications facility is not a use listed as either

permitted or prohibited in the R-3 zone. The Fairfield Zoning Regulations require structures in the R-3 zone to meet certain setback requirements including 40 feet for the front yard; 15 feet for a side yard; and 30 feet for a rear yard. The proposed 130-foot tower is located approximately 146 feet from the property boundary to the north; 1,571 feet from the property boundary to the south; 416 feet from the property boundary to the east; and 355 feet from the property boundary to the west.

**d. Inland Wetlands and Watercourses Regulations**

The Fairfield Inland Wetlands and Watercourses Regulations (“Wetlands Regulations”) define Regulated Activity as any operation within or use of a wetland or watercourse involving removal or deposition of material, or any obstruction, construction, alteration or pollution, of such wetlands or watercourses. Regulated Activity includes activities within certain horizontal distances of a wetland or watercourse if that activity will likely impact the wetland or watercourse. Four (4) copies of the Fairfield Wetlands Regulations were filed, in bulk, with the Council. APT completed a thorough wetlands investigation to assess and evaluate potential impacts of the proposed facility. A copy of a Wetlands Inspection Report is included in Attachment 11. As discussed above, APT identified one (1) wetland area proximate to the proposed Plattsville Relo Facility. This wetland consists of a small “wet” man-made stormwater basin approximately 23 feet south of the tower site. Due to the nature and function of this man-made wetland and because the tower site is located down gradient of the wetland, Cellco does not anticipate that the construction of the Plattsville Relo Facility will adversely impact this wetland area.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Community Panel Number 09001C0426F (Effective June 18, 2010) the Plattsville Relo Facility would be located in Flood Zone X, an area outside the 500-year flood zone. A copy of the FIRM is also included in Attachment 16.

## **6. Local Input**

Section 16-50j(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. Cellco’s outreach to local officials in Fairfield commenced on October 3, 2018, when it met with then Fairfield First Selectman Michael Tetreau to discuss possible tower locations on the SHU West Campus<sup>7</sup>. Cellco provided the First Selectman with a copy of technical information summarizing Cellco’s site search efforts on the West Campus. Following this meeting, the First Selectman strongly urged Cellco and SHU to consider alternative tower locations on the SHU Main Campus. Cellco and SHU spent the next fourteen (14) months exploring alternative tower locations and building rooftops on the SHU main campus. A complete listing of the alternative tower sites and rooftop locations considered are discussed in the Site Search Summary included in Attachment 8.

On December 23, 2019, Cellco commenced a second municipal consultation process by reaching out to Fairfield’s new First Selectwoman Brenda Kupchick and meeting with her Chief of Staff and the Fairfield Town Attorney to discuss the proposed tower site on the SHU main campus. At this meeting, Cellco discussed, in detail, the aspects of the proposed Plattsville Relo Facility, the need for the replacement wireless facility at SHU, the prior search for a tower site on the SHU West Campus and the Connecticut Siting Council application process.

At the December 23, 2019 meeting, Town Officials requested that Cellco host a Public Information Meeting (“PIM”) for abutting neighbors of the proposed tower site. A PIM was held at the Martire Forum on the SHU main campus on February 13, 2020. Notice of the PIM was published in the *Fairfield Citizen* on January 17, 2020 and was sent to twenty-three (23) abutting landowners in Fairfield and Bridgeport.

The PIM was attended by approximately ten (10) abutting landowners and two (2) members of the Fairfield Representative Town Meeting. Cellco discussed the need for the Plattsville Relo Facility and the Council’s application process. Cellco also discussed the alternative cell site locations it had investigated to that point and agreed to pursue additional alternative tower locations suggested by the PIM attendees. Each of the alternative locations are listed in the Site Search Summary (Attachment 8). Included in Attachment 17 is a list of abutting landowners notified of the PIM, a copy of the notice letter sent to the abutters, a copy of the Legal Notice of the PIM published in the *Fairfield Citizen*, a list of the individuals who “signed in” at the PIM and a copy of the presentation slides from the PIM.

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

Attachments 10, 11, 12, 13, 15 and 17 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Plattsville Relo Facility.

**a. Federal Communications Commission**

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

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<sup>7</sup> The SHU West Campus, the former General Electric headquarters property, is a 68.05-acre parcel at 3135 Easton Turnpike in Fairfield, approximately one mile west of the SHU main campus.



**b. Federal Aviation Administration (FAA)**

Cellco prepared a Federal Airways & Airspace Summary (“FA&A) Report for the proposed Plattsville 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 FA&A Report is included in Attachment 18.

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

**e. Connecticut State Historic Preservation Officer**

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

**D. Estimated Cost and Schedule**

**1. Overall Estimated Costs**

The total estimated cost of construction for the Plattsville Relo Facility is approximately \$425,000. This estimate includes:

- (1) Cell site radio equipment .....\$150,000
- (2) Tower .....50,000
- (3) Generator .....25,000
- (4) Miscellaneous (including site preparation, access, grading) .....200,000

**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.

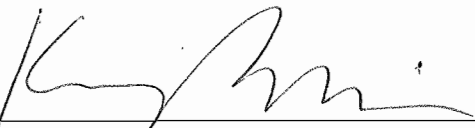
**IV. CONCLUSION**

Based on the facts contained in this Application, Cellco submits that the establishment of the Plattsville Relo Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in northeast Fairfield and portions of Bridgeport, Trumbull and Easton Connecticut 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 Plattsville Relo Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS

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