



**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION OF OPTASITE TOWERS LLC
AND OMNIPOINT COMMUNICATIONS, INC.
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF A TELECOMMUNICATIONS
FACILITY AT 58 MONTANO ROAD/
618 NEIPSIC ROAD IN THE TOWN OF
GLASTONBURY, CONNECTICUT

DOCKET NO. _____

Date: March 17, 2008

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ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

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I. Introduction

A. Purpose and Authority

Pursuant to Chapter 277a, Sections 16-50g *et seq.* of the Connecticut General Statutes ("CGS"), as amended, and Sections 16-50j-1 *et seq.* of the Regulations of Connecticut State Agencies ("RCSA"), as amended, Optasite Towers LLC ("Optasite") and Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. d/b/a T-Mobile ("T-Mobile") (together the "Applicants") hereby submit an application and supporting documentation to the Connecticut Siting Council ("Council") for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a wireless communications facility (the "Facility") at one of two alternate locations in the Town of Glastonbury (the "Application"). The proposed Facility will fill a coverage gap in T-Mobile's network plan to provide personal wireless communications services in Hartford County, and will also accommodate antennas and equipment of other wireless carriers. The proposed Facility, at either location, will provide service along State Route 2 in Glastonbury as well as in adjacent residential areas.

B. Executive Summary

Optasite and T-Mobile are joint applicants for the proposed site. Optasite was responsible for the site search in the area, and identified two sites for the proposed Facility. Optasite will be the Certificate holder and, as such, will be responsible for construction and maintenance of the Facility. Optasite identified two alternate sites for the proposed Facility.

Optasite identified the property owned by Rose Marie Shaw at 58 Montano Road in Glastonbury as its alternate Site A (the "Site A Property"). The Site A Property consists of 1.3 acres and is currently developed with a residence and associated structures. Site A is located in the northern portion of the Site A Property in close proximity to where the Site A Property abuts Route 2. At Site A, Optasite has leased a 50foot by 50 foot leased area. At Site A, Optasite proposes to install a monopole with appurtenances extending to approximately 120 feet in height and associated equipment within a 50 foot by 50 foot fenced compound. Vehicular traffic at Site A would extend from Montano Road over a new, gravel access driveway approximately 334 feet in length.

Optasite identified the property owned by Joanne Sullivan LLC at 618 Neipsic Road¹ in Glastonbury as its alternate Site B (the "Site B Property"). The Site B Property consists of 12.15 acres and is currently developed with a residence and associated structures. Site B is located in the southern portion of the Site B Property in close proximity to where the Site B Property abuts Route 2. At Site B, Optasite has leased a 70 foot by 70 foot leased area. At Site B, Optasite proposes to install a monopole with

¹ The Site B Property has two different addresses. The address listed in the Town of Glastonbury's assessors records is 618 Neipsic Road. However, the mailing address is 497A Wickham Road and is located at the terminus of Wickham Road Extension.

appurtenances extending to approximately 130 feet in height and associated equipment within a 70 foot by 70 foot fenced compound. Vehicular access at Site B would extend from Neipsic Road (also known as Wickham Road Extension) over a new, gravel access driveway approximately 1,412 feet in length.

Included in this Application and the exhibits attached hereto are survey-based plans, Exhibit A (Site A) and Exhibit B (Site B), for the proposed Facility and other information and reports found detailing the proposed Facility at both Site A and Site B and the potential environmental impacts of each alternative. Copies of Optasite's Notice of Option for Site A and Memorandum of Lease for Site B are attached hereto as Exhibit C. The Applicants respectfully submit that the reports and other supporting documentation included in this Application contain the relevant site specific information required by statute and the Council's regulations. A copy of the Council's Community Antenna Television and Telecommunication Facilities Application Guide with references to this Application is included as Exhibit D.

C. The Applicants

The co-applicant Optasite is a Delaware limited liability company with offices at One Research Drive, Suite 200C, Westborough, Massachusetts 01581. Optasite will construct and maintain the proposed Facility. The co-applicant T-Mobile is a Delaware corporation with a Connecticut office at 35 Griffin Road South, Bloomfield, Connecticut, 06002. The company and its affiliated entities are licensed by the Federal Communications Commission ("FCC") to construct and operate a personal wireless services system in Connecticut, which has been interpreted as a "cellular system" within the meaning of CGS Section 16-50i(a)(6). T-Mobile does not conduct any other business in the State of Connecticut other than the provision of cellular services under FCC rules

and regulations. T-Mobile is committed to use the proposed Facility as the anchor tenant.

Correspondence and/or communications regarding this Application shall be addressed to the attorneys for the applicants:

Cohen & Wolf
1115 Broad Street
Bridgeport, CT 06604
Attention: Julie D. Kohler, Esq.
Carrie L. Larson, Esq.

D. Application Fee

The estimated total construction costs for Site A are \$132,100 and, for Site B, are \$268,800. In accordance with RCSA Section 16-50v-1a(b), a check made payable to the Siting Council in the amount of \$1,000.00 accompanies this Application.

E. Compliance with CGS Section 16-50/(c)

Neither Optasite nor T-Mobile is engaged in generating electric power in the State of Connecticut, and therefore the proposed Facility is not subject to CGS Section 16-50r. The proposed Facility has not been identified in any annual forecast reports, and therefore is not subject to CGS Section 16-50/(c).

II. Service and Notice Required by CGS Section 16-50/(b)

Pursuant to CGS Section 16-50/(b), copies of this Application have been sent to municipal, regional, State, and Federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is attached hereto as Exhibit E. Pursuant to CGS 16-50/(b), notice of the Applicants' intent to submit this application was published on two occasions in the Hartford Courant and in the Journal Inquirer. A copy of the legal notice is attached hereto as Exhibit F. The publishers' affidavits of service will be forwarded upon receipt. In compliance with CGS 16-50/(b), notices were sent to each

person appearing of record as owner of a property which abuts the property on which Site A and Site B are located. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are included in Exhibit G.

III. Statements of Need and Benefits

A. Statement of Need

In amending the Communications Act of 1934 by the Telecommunications Act of 1996, the United State Congress recognized the important public need for high quality telecommunication services throughout the United States. The purpose of the Telecommunication Act of 1996 was to “provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans.” H.R. Conf. Rep. No. 104-458, 206, 104th Cong., Sess. 1 (1996). The Telecommunications Act of 1996 expressly preserved State and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of that authority, and preempted State or local regulatory oversight of radio frequency emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In doing so, Congress sought a balance between the public interest in deployment of wireless services and legitimate areas of State and/or local regulatory control over wireless infrastructure.

The Facility proposed in this Application is an integral component of T-Mobile’s wireless network in Hartford County. Currently, a gap in coverage exists in T-Mobile’s network in the Glastonbury area, specifically along Route 2 and in adjacent areas. The proposed Facility at either location, in conjunction with other existing and future facilities in Glastonbury and surrounding towns, is needed to allow T-Mobile to provide its wireless services to people living in and traveling through this area of the State.

T-Mobile's need for the proposed Facility is depicted in propagation plots attached hereto as Exhibit H for Site A and Exhibit I for Site B. Based on the location of the proposed Facility and the current lack of coverage in this area, the Applicants cannot readily predict a point in time at which the Facility might reach maximum capacity.

B. Statement of Benefits

T-Mobile is a leading provider of advanced wireless voice and data services throughout the United States with over 20 million subscribers. T-Mobile has been active in the Connecticut market since the mid-1990s and is actively involved today in the deployment of state-of-the-art wireless services. In recent years, T-Mobile and other carriers in Connecticut have seen the public's demand for traditional cellular telephone services evolve to include expectations that service will be available wherever they travel and that they will be able to access internet service as well as send and receive voice, text, image and video through their wireless devices. As the availability of wireless service has become widespread and as the technological services provided have become more sophisticated, people have begun to employ their wireless devices as their primary form of communication for both personal and business needs.

To help provide the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the "911 Act"). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress recognized that networks that would provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care, resulting in reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence

supports the public safety value of improved wireless communications in aiding lost, ill or injured individuals such as motorists, hikers and boaters.

As an outgrowth of the 911 Act, the FCC mandated that wireless carriers provide enhanced 911 services ("E911") as part of their communications networks. These services ultimately allow 911 public safety dispatchers to identify a wireless caller's geographical location within several hundred feet. T-Mobile has deployed and continues to deploy TDOA network technology to comply with the FCC E911 requirements. The proposed Facility will become an integral component of T-Mobile's E911 network in this area of the state upon construction of the Facility. As other wireless carriers expand their service in the Glastonbury area through the proposed Facility, E911 services will experience additional improvement.

C. Technological Alternatives

The FCC licenses granted to T-Mobile and other wireless carriers authorize them to provide cellular and PCS services in this area of the State through deployment of a network of wireless transmitting sites. The proposed Facility is a necessary component of T-Mobile's wireless network. The proposed Facility will also allow other wireless carriers to provide services in this area.

Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to providing service within the sizeable coverage gap in this area. Terrain variations, topography and tree cover in Glastonbury and the surrounding area, as well as other practical factors limit the use of such technologies and preclude their implementation as alternatives to the proposed Facility. The Applicants submit that there are no equally effective technological

alternatives to construction of a new tower Facility for providing reliable personal wireless services in this area of Connecticut.

IV. Site Selection and Tower Sharing

A. Site Selection

A search area is an area where a coverage and/or capacity problem exists within a carrier's network and where a new wireless facility is needed to provide service to the public. In general, wireless carriers and developers attempt to identify any existing towers or other structures of adequate height in a site search area and the surrounding environs which might accommodate the height and structural requirements for a wireless facility. Optasite conducted the site search in this area and determined that there were no wireless communications towers or other suitable towers or tall structures that would provide coverage for T-Mobile's existing coverage gap.

The specific site search which resulted in selection of the two proposed alternative sites is explained in the Site Search Summary and Rejected Sites Map, both attached hereto as Exhibit J. Initially, Optasite and T-Mobile both seek to identify any existing towers or other structures of adequate height in a site search area and the surrounding environs that may accommodate a wireless facility. There are fourteen towers within four miles of the proposed sites. All existing towers within a four mile radius of the proposed Sites are included in the table listed as "Surrounding Site Information" and corresponding map attached hereto as Exhibit K. There are no existing structures in the area of adequate height to fill T-Mobile's coverage gap in this area.

Once it was determined that a new tower facility was required, Optasite searched for properties upon which a tower could be located while at the same time minimizing any potential environmental impact to the extent practicable and feasible. The Site Selection

narrative and map of rejected sites, attached hereto as Exhibit J, provides a complete explanation of Optasite's methodology and actual search for potential sites in Manchester and depicts the locations reviewed during Optasite's search and the reasons for elimination from consideration of all but the proposed Sites. Due to the nature of development and terrain in the area, either Site is uniquely suited for a tower site due to its close proximity to Route 2 and the surrounding terrain.

B. Tower Sharing

To promote the sharing of wireless facilities in the Glastonbury area, Optasite proposes to construct a Facility that can accommodate T-Mobile and up to three additional antenna platforms and equipment for the wireless carriers in the Connecticut marketplace. Municipal public safety antennas also could be accommodated. Details of the design are included in Exhibits A and B. Materials provided by the Optasite to the Town of Glastonbury stated Optasite's willingness to provide, free of charge, space on the proposed monopole for municipal public safety communications antennas. As the proposed Certificate holder, Optasite affirms its willingness to do so.

V. Facility Design: Site A and Site B

A. Site A

At Site A, Optasite would lease a 2,500 square foot parcel within the approximately 1.3 acre parcel at 58 Montano Road. The proposed Facility at Site A would, at a minimum, require the construction of a 120 foot high self-supporting monopole. T-Mobile would install up to nine panel antennas on a platform at the top of the tower and place its equipment cabinets on concrete pads within a 50 foot by 50 foot equipment compound. The compound would be enclosed by a security fence, 8 feet in height. The monopole and equipment compound are designed to accommodate the

facilities of all wireless carriers active in the Connecticut marketplace. Optasite also would make space available, free of charge, for municipal public safety communications.

Vehicular access to the facility would extend from Montano Road over a new gravel driveway a distance of approximately 334 feet. Overhead utility service exists to the Site A Property; Optasite will extend utility service underground from an existing pole to the compound. Exhibit A contains plans, descriptions, a tree inventory and other relevant information for Site A. Exhibit L contains a wetlands delineation report. In summary, that information reveals that:

- The Site A Property is classified in the rural residential zoning district;
- There are no wetlands on the Site A Property;
- The Site A Property is and will continue to be used for residential purposes;
- Minimal grading of the proposed compound and new access drive would be required for the construction of the proposed Facility at Site A;
- Minimal clearing would be required for development of the proposed new access drive and compound area;
- The proposed Facility at Site A will have no effect on historic or architectural resources; and
- The proposed Facility at Site A will have no impact on water flow, water quality, or air quality and will comply with relevant noise regulations.

B. Site B

At Site B, Optasite would lease a 4,900 square foot parcel within the approximately 12.15 acre property located at 618 Neipsic Road a/k/a 497A Wickham road. The proposed Facility at Site B would at a minimum require the construction of a 130 foot high self-supporting monopole. T-Mobile would install up to nine panel antennas

on a platform at the top of the tower and place its equipment cabinets on concrete pads within a 70 foot by 70 foot equipment compound. The compound would be enclosed by a security fence, 8 feet in height. The monopole and equipment compound are designed to accommodate the facilities of all wireless carriers active in the Connecticut marketplace. Optasite also would make space available, free of charge, for municipal public safety communications.

Vehicular access to the facility would extend from Wickham Road Extension over a new gravel driveway a distance of approximately 1,421 feet to the equipment compound. Overhead utility service exists to the property; Optasite will extend utility service underground from an existing pole on Wickham Road Extension to the compound. Exhibit B contains plans, descriptions, a tree inventory and other relevant information for Site B. Exhibit L contains a wetlands delineation and additional report concerning the wetlands crossing design. In summary, that information reveals that:

- Site B is classified in the rural residential/AA residential zoning districts;
- A wetland area is found 22 feet from the proposed compound and the proposed access road will cross a wetland for an area of approximately 52 square feet. In total, the crossing will impact 2,852 square of the existing wetland on the Site B Property. However, due to the culvert design Optasite will use during construction, the wetlands crossing will not have a significant impact on those wetlands;
- The Site B Property is and will continue to be used for residential purposes;
- Moderate clearing would be required for development of the proposed compound area and access drive;
- The proposed Facility at Site B will have no effect on historic or architectural resources;and

- The proposed Facility at Site B will have no impact on water flow, water quality, or air quality and will comply with relevant noise regulations.

VI. Environmental Compatibility

Pursuant to CGS Section 16-50p, the Council is required to find and to determine as part of the Application process any probable environmental impact of the facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity and fish and wildlife. As demonstrated in this Application and the accompanying Attachments and documentation, neither of the proposed Facilities will have any significant adverse environmental impacts.

A. Visual Assessment

The visual impact of the proposed Facility at both Site A and Site B would vary from different locations around the towers depending upon factors such as vegetation, topography, distance from the towers, and the location of structures around the towers and there is virtually no difference in the visual impact of Site A versus Site B. Exhibit M contains a computer-based, predictive viewshed model which depicts the potential impact of the proposed Facility from surrounding views for both Sites as well as a Visual Resource Evaluation.

Optasite retained Vanasse Hangen Brustlin (“VHB”) to prepare the Visual Resource Evaluation. On February 25, 2008, VHB conducted a balloon float test at 120 feet AGL at Site A and 130 feet AGL at Site B in order to evaluate the potential viewshed associated with the proposed Facility at either location. VHB sought to determine the visibility impact of the Facility at both proposed Sites, accounting for local, state and federal historic, hiking and recreational sites within the study area, as well as within a two-mile radius of the proposed Site (“Study Area”).

The Visual Resources Evaluation demonstrates that the Facility as proposed at Site A and Site B will be as inconspicuous as possible. The topography and the mature vegetation at the property that includes both Sites will significantly limit the visual impact of the proposed Facility. The potential visual impact is very similar for both Site A and Site B and therefore the analysis contains a general discussion of the overall visual impact and then discusses the slight variations of predicted visual impact between Site A and Site B.

The existing vegetation in the area of the property for both Site A and Site B is mature, mixed deciduous hardwood species with an average estimated height of 65 feet. Based on the viewshed analysis contained in Exhibit M, areas from which the proposed Sites will be at least partially visible year round comprise only 24 acres for Site A and 19 for Site B, which is less than seven percent (>1%) of the entire Study Area. The visibility of the tower at either of the proposed Sites will be minimized due largely to the topography and extent of tree cover found within the Study Area. The Facility at either of the proposed Sites will be visible above the tree canopy from portions of Route 2, Neipsic Road, Wickham Road, but views from the proposed Facility at either Site are expected to be limited to primarily within 0.5 miles of the proposed Facility at either Site. Overall, six (6) residences will have partial year round views of Site A and an additional four (4) residences will have partial, seasonal views of Site A. For site B, nine (9) residences will have partial year round views of Site B and an additional six (6) residences will have partial, seasonal view of Site B. Of note, VHB did not identify any scenic roadways or other sensitive visual receptors in the area of either Site. J.B. Williams Park, a local park, is located within the Study Area but no views are anticipated from that park.

The compound area at either Site will have a de minimis visual impact as it will be screened by the proposed fencing and existing vegetation at either Site.

These Visual Resources demonstrate that, even from most of the areas where either Facility will be visible, the tower is unobtrusive. Accordingly, the proposed Facility will not result in an unacceptable adverse visual impact.

As the Visual Resources confirm, either of the two alternate sites of the proposed Facility will not have a significant visual impact on the surrounding area. In addition, the Visual Resources confirm that the location of the proposed Facility at either proposed Site will not have a significant visual impact on any hiking or recreational sites, scenic highways or historic sites.

Weather permitting, Optasite will raise a balloon with a diameter of at least three (3) feet at both Site A and B on the day of the Council's first hearing session on this Application, or at a time otherwise specified by the Council.

B. Solicitation of State Agency Comments

Optasite submitted a request for review and comment for both the proposed Site A and Site B to the Connecticut State Historic Preservation Officer ("SHPO") and the Connecticut Department of Environmental Protection ("DEP"). Both SHPO and DEP have determined that, given the nature of the terrain and soil on the Property at either Site, no impacts are anticipated.

A copy of the SHPO and DEP correspondence regarding both Site A and Site B is attached hereto as Exhibit N.

C. MPE Limits/Power Density Analysis

In August 1996, the FCC adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like those proposed in this

Application. To ensure compliance with applicable standards, T-Mobile has performed maximum power density calculations for the proposed Facilities assuming that the antennas were pointed at the base of the tower and all channels were operating simultaneously. The resulting power density for T-Mobile's operations at Site A would be approximately 3.781% of the applicable MPE standards and at Site B would be approximately 3.182% of the applicable MPE standards. A copy of the power density calculations and report for both sites are attached hereto as Exhibit O.

D. Other Environmental Factors

The proposed Facility would be unmanned, requiring infrequent monthly maintenance visits by each carrier that will last approximately one hour. T-Mobile's equipment at the Facility would be monitored 24 hours a day, 7 days a week from a remote location. The proposed Facility at either Site A or Site B would not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed, and the proposed Facility will not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations. The construction and operation of the proposed Facility will have no significant impact on the air, water, or noise quality of either site.

Both Site A and Site B have been evaluated in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 ("NEPA"). A copy of the NEPA Report for Site A is attached hereto as Exhibit P and a copy of the NEPA Report for Site B is attached hereto as Exhibit Q. Neither Site A nor Site B was identified as a wilderness area. No National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands are located in the vicinity of the subject sites. The subject sites are not located in or adjacent

to any areas identified as a wildlife preserve. Further, according to the site survey and field investigations, no federally regulated wetlands or watercourses will be impacted by the proposed Facility at Site A. While construction at Site B does contain a wetlands crossing for construction of the access drive, the proposed culvert design mitigates any wetlands impact. In addition, the NEPA report demonstrates neither site would be located is not located within a 100-year or 500-year floodplain. As such, and based on the information contained in other reports included in this Application, Site A and Site B are both categorically excluded from any requirement for further environmental review by the FCC in accordance with NEPA and no permit is required by that agency prior to construction of the proposed Facility. See 47 C.F.R. §§ 1.1306(b) and 1.1307(a).

VII. Consistency with the Town of Glastonbury's Land Use Regulations

Pursuant to the Council's Application Guide, included in this section is a narrative summary of the consistency of the project with the local municipality's zoning and wetland regulations and plan of conservation and development. A description of the zoning classification of each Site and the planned and existing uses of the proposed site locations are also detailed in this section.

A. Glastonbury's Plan of Development

The Glastonbury Plan of Conservation and Development (the "Plan"), a copy of which is included in the bulk filing, was adopted on September 23, 2007. Wireless communications facilities are specifically addressed in the "Town Wide Policies" section of the Plan under "transmission facilities." The Plan states that "promote utilization of existing structures and buildings for new communication transmitting towers, with new tower facilities supported only after all other alternatives have been exhausted." See Bulk Filing, Plan of Conservation and Development at 17. Accordingly, Optasite

respectfully submits that the proposed Facility, which will provide needed wireless communications service within the Town and a means for upgrading the Town's emergency communications, is consistent with the Town's Plan since there are no existing towers or structures upon which T-Mobile could co-locate and fill its coverage gap along Route 2 and the surrounding area.

B. Glastonbury's Zoning Regulations

According to the Town's zoning map and municipal tax records, Site A is classified in the Town of Glastonbury's rural residential zoning district. Site B is classified partially in the Town's rural residential zoning district and partially in the AA residential zoning district.

Section 3.21 of the Town's Zoning Regulations outlines the zoning requirements for commercial radio and television towers. See Bulk Filing, Zoning Regulations, Section 3.21. It states that "[c]ommercial radio, television and other transmitting or relay antenna towers, when permitted, shall be set back from all abutting streets and adjacent property a distance of not less than one and one half times the height of the proposed tower." Towers are permitted in the rural residential zone with a special exception permit from the zoning board of appeals. See Bulk Filing, Zoning Regulations, Section 4.2.1. Other than those two references, the Zoning Regulations do not specifically address telecommunications facilities. While the proposed Facility at Site A and at Site B does not technically comply with the section 3.21 setback requirements, a Facility at either Site will be constructed with a pre-engineered yield point so that, in the unlikely event of a failure, the tower will remain on the subject property. Therefore, a Facility at either Site, will comply with the Zoning Regulations.

C. Planned and Existing Land Uses

Both Site A and Site B are located on residential properties that are currently used for residential purposes. The Applicants are not aware of any future development plans on either property.

D. Glastonbury's Inland Wetlands and Watercourses Regulations

The Glastonbury Inland Wetlands and Watercourses Regulations ("Local Wetlands Regulations") regulate certain activities conducted in or adjacent to "wetlands" as defined therein. One such regulated activity is "any removal or deposition of material or any obstruction, construction, alteration or pollution" of such wetland and in areas adjacent to a wetland or watercourse. See Bulk Filing, Inland Wetlands and Watercourses Regulations, Section 2.1 (t). The Local Wetlands Regulations do define a specific buffer area as a radius of 100 feet from each point on the boundary of a wetland or watercourse." See Bulk Filing, Inland Wetlands and Watercourses Regulations, Section 2.1 (f).

According to the site survey, field investigations conducted at Site A, no watercourses or wetlands are located within 100 feet of that Site. In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility at Site A.

According to the site survey contained in Exhibit B and the wetlands delineation report contained in Exhibit L, there is a wetland area that will be crossed for construction of the access drive at Site B. Optasite has employed a culvert design in order to minimize any impact to that wetland area. See Exhibit L. In accordance with the

Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility.

VIII. Consultations with Local, State and Federal Officials

A. Local Consultations

CGS Section 16-50(e) requires an applicant to consult with the local municipality in which a proposed facility may be located and with any adjoining municipality having a boundary of 2,500 feet from the proposed facility concerning the proposed and alternate sites of the facility.

On September 27, 2007, T-Mobile submitted a technical report to the First Selectman of the Town of Glastonbury with respect to two alternative sites in Glastonbury. The technical report, a copy of which is being bulk filed with this Application, included specifics about each proposed location and addressed the public need for the facility, the site selection process and the environmental effects of the proposed Facility. On October 25, 2007, representatives from Optasite met with Richard Johnson, the Town of Glastonbury's Town Manager. The Town of Glastonbury did not undertake any hearings or information sessions on the proposal, and did not provide comments to the Applicants. Initially, the Town was interested in exploring the possibility of locating the proposed Facility on Town-owned property in the vicinity of the two sites. However, in follow-up, the Town did not express its willingness to pursue such a proposal.

Copies of correspondence with the Town of Glastonbury is attached hereto as Exhibit R.

B. Consultations with State Officials

As noted in Section VI.B of this Application, the Applicants undertook a consultation with the SHPO and DEP in the course of its NEPA survey. Copies of the correspondence with SHPO and DEP are attached hereto as Exhibit N.

C. Consultation with Federal Agencies

Optasite has received preliminary determinations from the Federal Aviation Administration (“FAA”) for Site A and Site B, which are attached hereto as Exhibit S, respectively. The results indicate neither of the proposed Facilities would require FAA registration, let alone FAA review as a potential air navigation obstruction or hazard. Therefore, no FAA lighting or marking would be required for the towers proposed in this Application. Optasite will forward copies of the final FAA approval for both Site A and Site B, when received.

T-Mobile’s FCC license permits it to modify its network by building wireless facilities within its licensed area without prior approval from the FCC provided that a proposed facility does not fall within one of the “listed” categories requiring review under NEPA. The “listed” categories, included in 47 CFR §1.1307, are activities that may affect wilderness areas, wilderness preserves, endangered or threatened species, critical habitats, National Register historic districts, sites, buildings, structures or objects, Indian religious sites, flood plains and federal wetlands. The resulting reports, attached hereto as Exhibit P and Q, confirms that the Site A Property and Site B Property would be located does not fall under any of the NEPA “listed” categories of 47 CFR §1.1307. Therefore, neither proposed Facility requires review by the FCC pursuant to NEPA.

IX. Estimated Cost and Schedule

A. Overall Estimated Cost

The total estimated cost of construction for the proposed Site A facility is \$132,100. This estimate includes:

- (1) Tower and foundation costs (including installation) of approximately \$55,000;
- (2) Site development costs of approximately \$49,100; and
- (3) Utility installation costs of approximately \$28,000.

The total estimated cost of construction for the proposed Site B facility is \$268,800. This estimate includes:

- (1) Tower and foundation costs (including installation) of approximately \$55,000;
- (2) Site development costs of approximately \$101,800; and
- (3) Utility installation costs of approximately \$112,000.

B. Overall Scheduling

Site preparation and engineering would commence immediately following Council approval of Optasite's Development and Management ("D&M") Plan and is expected to be completed within three (3) to four (4) weeks. Installation of the monopole, antennas and associated equipment is expected to take an additional two (2) weeks. The duration of the total construction schedule is approximately six (6) weeks. Facility integration and system testing is expected to require an additional two (2) weeks after the construction is completed.

X. Conclusion

This Application and the accompanying materials and documentation clearly demonstrate that a public need exists in the Town of Glastonbury for improved wireless services and that neither of the proposed Facilities will have any substantial adverse environmental effects. The Applicants therefore respectfully submit that the public need for the proposed facility outweighs any potential environmental effects resulting from the construction of the proposed facility at Site A or Site B, and that the Council should grant a Certificate of Environmental Compatibility and Public Need to the Applicants for a proposed wireless telecommunication facility in the Town of Glastonbury.

Respectfully Submitted,

By:  _____

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