CONNECTICUT SITING COUNCIL
DOCKET NO. 382

IN THE MATTER OF:

APPLICATION OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY OFF LANE STREET, SHELTON, CONNECTICUT

APPLICANT'S POST-HEARING BRIEF

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EXECUTIVE SUMMARY

On July 15, 2009, Cellco Partnership d/b/a Verizon Wireless ("Cellco") filed an application ("Application") with the Connecticut Siting Council ("Council") for a Certificate of Environmental Capability and Public Need ("Certificate") to construct a wireless telecommunications facility on property owned by the Brownson Country Club, off Lane Street in the Huntington section of the City of Shelton, Connecticut (the "Huntington Facility"). The proposed Huntington Facility would provide wireless service along portions of Route 108, as well as local roads in the Huntington area.

Facility Description

At the Huntington Facility, Cellco proposes to construct a 120-foot tower disguised as a pine tree in the southerly portion of the Brownson Country Club property, north of Lane Street in Huntington. Simulated branches will extend to an overall height of 127 feet above ground level. Cellco would install fifteen (15) panel-type antennas, six (6) Personal Communication Service ("PCS") (1900 MHz) antennas; six (6) cellular (850 MHz) antennas; and three (3) LTE (700 MHz) antennas at a centerline height of 120 feet above ground level. Cellco would also install a 12' x 30' shelter on the ground near the base of the tower to house its radio equipment and a back-up generator. Vehicular and utility access to the Huntington Facility would extend from Lane Street a total distance of approximately 1,680 feet to the cell site.

Public Need

Cellco currently experiences significant gaps in both cellular and PCS coverage along portions of Route 108 between its existing Shelton North, Shelton North 2, Shelton 2, Trumbull

East and Trumbull cell sites. The proposed Huntington Facility would provide reliable service to a 2.16 mile portion of Route 108 and an overall area of 6.9 square miles at cellular frequencies; and a 2.08 mile portion of Route 108 and an overall area of 3.8 square miles at PCS frequencies.

Nature of Probable Impacts

The only potential adverse impact from the proposed tower involves "scenic values." The area where some portion of the proposed Huntington Facility tower would be visible year round (above the existing tree line), is limited to approximately seventeen (17) acres, less than one-half of one percent of the two-mile radius (8,042 acre) study area. Areas where seasonal views are anticipated comprise an additional twenty-nine (29) acres. At least partial year-round views may be possible from select portions of eleven (11) residential properties within the two mile radius study area. The stealth "tree tower" design will significantly mitigate the visual impact of the proposed tower.

Conclusion

The evidence in the record clearly demonstrates that there is a need for the proposed Huntington Facility and that the environmental impacts from the proposed facility would be minimal when balanced against its benefits. Therefore, the Council should approve the Application as submitted.

I. INTRODUCTION

On July 15, 2009, Cellco Partnership d/b/a Verizon Wireless ("Cellco" or "Applicant") filed with the Connecticut Siting Council ("Council") an application (the "Application") for a certificate of environmental compatibility and public need ("Certificate"), pursuant to Sections 16-50g et seq. of the Connecticut General Statutes ("Conn. Gen. Stat."), for the construction, maintenance and operation of a wireless telecommunications facility (the "Huntington Facility") on the southerly portion of a parcel owned by the Brownson Country Club ("BCC"). The BCC property consists of two parcels, a 44-acre parcel located north of Route 108 and east of Soundview Avenue and a 55-acre parcel located south of Route 108 and north of Lane Street. The Huntington Facility is proposed to be located on the southerly (55-acre) portion of the BCC property. (Cellco Exhibit 1 ("Cellco 1"), Tab 1). Cellco currently experiences significant gaps in coverage at both PCS and cellular frequencies along portions of Route 108 and local roads in the Huntington area between its existing Shelton North cell site at 161 Birdseye Road in Shelton, Shelton North 2 cell site at 219 Nells Rock Road in Shelton, Shelton 2 cell site at 70 Platt Road in Shelton, Trumbull East cell site, a water tank off Huntington Street in Shelton and Trumbull cell site off Video Lane in Trumbull. (Cellco 8). These coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its Federal Communications Commission ("FCC") license and to meet the demands of its wireless telecommunications customers. The Huntington Facility would provide for much needed coverage along portions of Route 108, as well as local roads in Huntington. (Cellco 1; Cellco 8).

II. PROCEDURAL BACKGROUND

The Council conducted an evidentiary and public hearing on the Application on October 6, 2009. (October 6, 2009 Transcript (afternoon) ("TR1") at 2; October 6, 2009 Transcript (evening) ("TR2") at 2). Prior to the afternoon session of the hearing, the Council and its staff visited the BCC property and the proposed Huntington Facility cell site. At the Council's request, Cellco caused a balloon with a diameter of approximately four (4) feet to be flown at the proposed tower location, at 127 feet above ground level ("AGL") during the site visit. (Cellco 1; TR2, p. 30). Other than the Applicant, there are no parties or intervenors participating in the Docket No. 382 proceeding.

This post-hearing brief is filed on behalf of the Applicant pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies ("R.C.S.A.") and the Council's directives. (TR2, p. 39). This brief evaluates the Application in light of the review criteria set forth in Section 16-50p of the Connecticut General Statutes and addresses several other issues raised throughout the course of this proceeding.

III. FACTUAL BACKGROUND

A. Pre-Application History

Cellco is licensed to provide cellular (850 MHz), PCS (1900 MHz) and LTE (700 MHz) service throughout Connecticut. (Cellco 1, Tab 6). Cellco currently experiences significant gaps in cellular and PCS service along portions of Route 108 and local roadways in the Huntington area between its existing Shelton North, Shelton North 2, Shelton 2, Trumbull East and Trumbull cell sites. (Cellco 1; Cellco 8).

Cellco began its search for a cell site in Huntington in September, 2006. (Cellco 1, Tab 9). As a first step in its standard site search process, Cellco investigates whether there are existing towers, or other non-tower structures of suitable height in an area that can be used to satisfy its coverage objectives. There are no such existing towers in the vicinity of the Huntington Facility that Cellco does not already share. Likewise, there are no existing non-tower structures of suitable height in the Huntington area that can satisfy Cellco's overall coverage objectives. (Cellco 1, Tab 9). If a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual and other environmental impacts of the facility can be reduced to the greatest extent possible. (Cellco 1 at 10-11, Tab 9). Cellco selected the location for the proposed Huntington Facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact.

B. Local Contacts

Cellco's initial contact with the City of Shelton officials began in November of 2008, when Cellco provided more detailed information on its tower proposal to the Shelton Historic Society, Inc. At about this same time, Cellco representatives were engaged in informal discussions with Rich Schultz, Shelton's Planning and Zoning Administrator, about the proposed Huntington Facility. (Cellco 3).

The local input process for the Docket No. 382 application formally commenced on February 4, 2009, when Cellco representatives met with Shelton's Mayor Mark A. Lauretti and Rich Schultz regarding the Huntington Facility proposal. (Cellco 1 at 21). At that meeting, Mayor Lauretti and Mr. Schultz received copies of technical information summarizing Cellco's plans to establish a telecommunications facility on the BCC property ("Technical Report"). (Cellco 1 at 21;

Cellco (Bulk) 1.d.). At the request of Mayor Lauretti and Mr. Schultz, Cellco agreed to host a Public Information Meeting ("PIM") on March 3, 2009, at the Shelton Community Center in Huntington. Notice of the PIM was sent to all landowners whose property abuts the southerly portion of the BCC property, including each individual unit owner in the Aspetuck Village Condominium development (nearly 500 property owners). Notice of the PIM was also published in the *Connecticut Post*. (Cellco 1 at 21, Tab 5; Cellco 3).

C. Tower Sharing

Consistent with its practice, Cellco regularly explores opportunities to share its facilities with other wireless service providers. Cellco has designed the proposed tree tower so that it could be shared by other carriers. During the course of its meeting with municipal officials in Shelton, Cellco offered to provide access to the tower, at no cost, to the City's emergency service providers if such a need exists. Cellco would also provide the City with ground space within the facility compound, if needed. (Cellco 1 at 11).

During the course of the Council's October 6, 2009 hearing, the Council and Cellco discussed several types of alternative tower structures including a traditional monopole with full antenna platforms, a flagpole-type structure with antennas installed behind RF transparent screening panels and a monopole structure with flush-mounted antennas. (TR1 at 69-71). Cellco explained that tower sharing opportunities would exist with either a tree tower or traditional monopole. The use of either a flagpole or flush-mount configuration, however, requires Cellco to mount its cellular, PCS and LTE antennas at three separate levels on the tower, essentially eliminating opportunities for tower sharing. (TR1 at 64-65).

D. The Huntington Facility Proposal

The Huntington Facility would be located within a 40' x 66' fenced compound in the central portion of a 55-acre parcel owned by the BCC. (Cellco 1, Tab 1, Plan Sheet C-1). At the Huntington Facility, Cellco would construct a new 120-foot tall monopole tower disguised as a pine tree. Simulated branches would extend an additional seven (7) feet above the top of the tower to an overall height of 127 feet above ground level. Cellco will install fifteen (15) panel-type antennas (six (6) PCS; six (6) cellular; and three (3) LTE) each with their centerline height at 120 feet. (Cellco 1 at 2-3, Tab 1).

Cellco would also install a 12' x 30' single-story shelter near the base of the tower to house its receiving, transmitting, switching, processing and performance monitoring equipment and the required heating and cooling equipment. A diesel-fueled back-up generator would be installed within a segregated room in Cellco's equipment shelter for use during power outages and periodically for maintenance purposes. The tower and equipment shelter would be surrounded by an 8-foot high security fence and gate. Vehicular access to the Huntington Facility would extend from Lane Street through the BCC property a distance of approximately 1,680 feet. Portions of the access driveway will follow an existing cart path. Overall, width of the access driveway can be limited to reduce the overall environmental effect of the construction activity. (Cellco 1 at 3; TR1 at 78).

IV. THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. § 16-50p FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

Section 16-50p of the Public Utility Environmental Standards Act ("PUESA"), Conn. Gen. Stat. §16-50g *et seq*., sets forth the criteria for Council decisions in Certificate proceedings and states, in pertinent part:

> In a certification proceeding, the council shall render a decision upon the record either granting or denying the application as filed, or granting it upon such terms, conditions, limitations or modifications of the construction or operation of the facility as the council may deem appropriate . . . The council shall file, with its order, an opinion stating in full its reasons for the decision. The council shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (1) A public need for the facility and the basis of the need; (2) the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflict 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; (3) why the adverse effects or conflicts referred to in subdivision (2) of this subsection are not sufficient reason to deny the application. . . .

Conn. Gen. Stat. § 16-50p(a).

Under Section 16-50p, the Applicant must satisfy two key criteria in order for the Application to be granted and for a Certificate to issue. First, the Applicant must demonstrate that there is a "public need for the facility." Conn. Gen. Stat. § 16-50p(a)(1). Second, the Applicant must identify "the nature of the probable environmental impact" of the proposed facility through review of the numerous elements specified in Conn. Gen. Stat. § 16-50p(a)(2), and then demonstrate that these impacts "are not sufficient reason to deny the application." Conn. Gen. Stat. § 16-50p(a)(3). The evidence in the record for this docket establishes that the above criteria have been satisfied and that the Applicant is entitled to a Certificate.

A. A Public Need Exists for the Huntington Facility

The first step in the review of the pending Application addresses the public need for the proposed facility. As noted in the Application, the FCC in its Report and Order released on May 4, 1981 (FCC Docket No. 79-318) recognized a public need on a national basis for technical improvement, wide area coverage, high quality and a degree of competition in mobile telephone service. More recently, the Federal Telecommunications Act of 1996 (the "Telecommunications Act") emphasized and expanded on these aspects of the FCC's 1981 decision. Among other things, the Telecommunications Act recognized an important nationwide public need for high quality personal wireless telecommunications services of all varieties. The Telecommunications Act also expressly promotes competition and seeks to reduce regulation in all aspects of the telecommunications industry in order to foster lower prices for consumers and to encourage the rapid deployment of new telecommunications technologies. (Cellco 1; Council Adm. Notice 7).

Cellco currently experiences significant gaps in cellular and PCS coverage along portions of Route 108 between its existing Shelton North, Shelton North 2, Shelton 2, Trumbull East and Trumbull cell sites. (Cellco 1; Cellco 8). These existing coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its FCC license and to meet the demands of its wireless telecommunications customers. The Huntington Facility described above would provide reliable service to a 2.16 mile portion of Route 108 and an overall area of 6.9 square miles at cellular frequencies; and a 2.08 mile portion of Route 108 and an overall area of 3.8 square miles at PCS frequency. (Cellco 1 at 2). The inclusion of the Huntington Facility in Cellco's wireless network would also resolve existing performance problems experienced by customers in the area with

dropped calls. Currently, the rate of dropped calls in the Huntington area is three (3) percent, more than three times Cellco's system average. (TR1 at 46).

As the Council is aware and as discussed at the hearing, Cellco holds licenses to provide cellular, PCS and LTE service in Fairfield County, Connecticut and proposes to deploy all such frequencies at the Huntington Facility, if approved. (Cellco 1). The cellular, PCS and LTE services Cellco plans to deploy, operate at different frequencies, and will allow customers to use the same cell site for voice and/or data services. By installing cellular, PCS and LTE antennas at the Huntington Facility, Cellco can also ensure that it has more capacity available to meet the growing demand of its customers for wireless voice and data services. (Cellco 1).

The record contains ample, written evidence and testimony that a 127-foot tree tower at the BCC property would allow Cellco to achieve and maintain high quality wireless telecommunications service at cellular, PCS and LTE frequencies without interruption from dropped calls and interference. The Huntington Facility would be incorporated into a network design plan, intended to provide Cellco customers with reliable wireless service along Route 108, as well as along local roads in Huntington where coverage is currently unreliable or non-existent. (Cellco 1; Cellco 4; Cellco 8).

B. Nature of Probable Impacts

The second step in the statutory review procedure addresses the probable environmental impacts of the proposed facility and particularly the following factors:

1. Natural Environment and Ecological Balance

The proposed development of the Huntington Facility has eliminated, to the extent possible, impacts on the natural environment. All improvements associated with the proposed Huntington

Facility would be located either within a 40' x 66' site compound or along a proposed access driveway extending from Lane Street, a distance of approximately 1,680 feet. Portions of the driveway will use an existing cart path on the BCC property. Utilities will extend underground from existing service along Lane Street to the cell site, along the proposed access drive.[1] (Cellco 1, Tab 1). To further reduce the environmental impact of the Huntington Facility, Cellco would agree to reduce the proposed width of the improved access driveway from 12 feet to an appropriate width that can accommodate maintenance vehicle traffic to the site going forward. (TR1 at 78). Construction of the site compound and access drive and the installation of underground utilities will require clearing of only approximately twenty (20) trees with a six inch (6") diameter at breast height. Sixteen of the twenty trees are located in the immediate area of the site compound. (TR1 at 15). Overall, the limited construction activity would have a negligible environmental impact on the BCC property. No evidence to refute this conclusion was presented to the Council.

2. Public Health and Safety

Cellco has considered several factors in determining that the nature and extent of potential public health and safety impacts resulting from installation of the proposed facility would be minimal or nonexistent.

First, the potential for the Huntington Facility towers to fall does not pose an unreasonable risk to health and safety. The proposed towers would be designed and built to meet Electronic Industries Association ("EIA") standards. Other than the proposed equipment shelter, there are no

[1] At the request of the property owner, the westerly portion of the new access drive would be shifted to the south, closer to the existing fairway, before tying into the existing cart path on the Property. The relocated portion of the access drive was marked and discussed during the Council's pre-hearing site walk. (TR1 at 40).

structures within the fall radius of the tower and the fall radius would remain entirely within the limits of the BCC property. The nearest residence is located approximately 360 feet to the south of the Huntington Facility. (Cellco 1, Tab 1).

Second, worst-case potential public exposure to RF power density for operation of the Huntington Facility at the nearest point of uncontrolled access (the base of the tower) would be 26.77% of the FCC standard. Power density levels would drop off rapidly as distance from the towers increases. (Cellco 1, Tab 1, p. 8).

Overall, the nature and extent of potential, adverse public health and safety impacts resulting from construction and installation of the Huntington Facility would be minimal or nonexistent. No evidence to refute this conclusion was presented to the Council.

3. Scenic Values

As noted in the Application, the primary impact of any tower is visual. Cellco's site search methodology, described in the Site Search Summary, is designed in large part to minimize such visual impacts. As discussed above, wherever feasible, Cellco avoids construction of a new tower by first attempting to identify existing towers or other tall non-tower structures in or near the search area. Cellco currently maintains antennas on four (4) existing towers and one water tank within four miles the of Huntington Facility. No existing non-tower structures of suitable height exist in the Huntington area. (Cellco 1, Tab 9).

If it determines that a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the site would be reduced to the greatest extent possible. Cellco explored the use of several alternative sites in the Huntington area including three different locations on the BCC

property, two church steeples in the Huntington Historic District and City-owned property in the Huntington area. Each of the alternative locations were rejected, either for technical reasons or, in the case of the City-owned property, because the City was unwilling to lease its property for telecommunications purposes. (Cellco 1, Tab 9; TR1 at 67-68).

The BCC property and the surrounding area are heavily-wooded and sparsely developed with residential uses along Lane Street. To the north and east the BCC property abuts portions of the Aspetuck Village Condominium complex. The Huntington Facility would be located in the central portion, a 55-acre parcel, adequately buffered from even the closest adjacent residential properties. (Cellco 1, Tab 10).

Cellco submitted a Visual Resource Evaluation Report prepared by VHB ("VHB Report") as a part of the Application. Prior to preparing its report, VHB conducted a balloon float at the BCC property and field reconnaissance to assess visibility of the Huntington Facility. VHB determined that the proposed Huntington Facility tower would be partially visible above the tree canopy from approximately 17 acres, or less than one-half of one percent of the two mile radius (8,042-acre) study area. VHB estimates that there are eleven (11) single-family residential properties and forty-eight (48) Aspetuck Village Condominium units within 1,000 feet of the tower location. Areas where seasonal views are anticipated comprise an additional twenty-nine (29) acres and are located in select portions of adjacent residential areas to the north and south of the Huntington Facility. (Cellco 1, Tab 10).

4. Historical Values

As it does with all of its tower applications, prior to filing the Application with the Council, Cellco requested that the State Historic Preservation Office ("SHPO") of the Connecticut Historical

Commission (the "Commission") review the proposed facility and provide a written response. Based on its review of the information submitted by Cellco, and following a site visit by a member of its staff, the State Historic Preservation Office determined that the development of a telecommunications facility at the Property would have "no adverse effect" on cultural resources listed on or eligible for the National Register of Historic Places.[2] (Cellco 1, Tab 11; TR1 at 34-35). No evidence to the contrary was presented to the Council. Furthermore, Cellco has no reason to believe that there are any other impacts on historical values not addressed by the SHPO's review.

5. Recreational Values

There are no public recreational activities or facilities at or near the BCC property that would be impacted by development of the Huntington Facility. (Cellco 1). The tree tower would be visible from portions of the Shelton Land Trust property to the south, used for hiking and other passive recreation. However, the stealth tree tower design would blend with the surrounding vegetation and minimize any potential visual effects. (Cellco 1, Tab 10).

6. Forests and Parks

There are no State forests or State parks within a two-mile radius of the Huntington Facility. (Cellco 1, Tab 10). The tower, therefore, will have no impact on either of these resources. No evidence to refute this conclusion was presented to the Council.

[2] Due to the Huntington Facility's proximity to the Huntington Historic District, SHPO representatives were present during a balloon float at the BCC property to further assess any impact on historic buildings or designated historic districts. (TR1 at 72-74).

7. Air and Water Quality

a. Air Quality.

The equipment at the site would generate no air emissions under normal operating conditions. During power outage events and periodically for maintenance purposes, Cellco would install a diesel-fueled back-up generator to provide emergency power to the Huntington Facility. The use of the generator during these limited periods would result in minor levels of emissions. Pursuant to R.C.S.A. § 22a-174-3, Cellco will obtain an appropriate permit from the Connecticut Department of Environmental Protection ("DEP") Bureau of Air Management prior to installation of the proposed generator. (Cellco 1).

b. Water Quality.

The proposed Huntington Facility would not utilize water, nor would it discharge substances into any surface water, groundwater, or public or private sewage system. Dean Gustafson, Professional Soil Scientist with VHB, Inc., conducted a field investigation and completed a Wetlands Delineation Report and Wetlands Impact Analysis (collectively, the "Wetlands Report") for the Huntington Facility. According to the Wetlands Report, construction of the Huntington Facility access driveway will involve certain improvements to an existing crossing between two existing ornamental ponds on the BCC property. The construction of a concrete cast-in place bridge structure will result in approximately 500 square feet of wetlands impacts to the two ponds, most of which would be temporary. Two small disturbed and isolated wetland features near the proposed entrance to the site compound would be directly impacted by the proposed access driveway. This area of wetland impact is approximately 1,000 square feet. These small wetland areas are of low quality and provide little or no function or value. (Cellco 1,

Tab 12; TR1 at 56-58). Alternative access routes to the site compound that would eliminate impacts to these small isolated and disturbed wetlands would result in more substantial overall environmental impact. (TR1 at 74-76). No evidence to refute these conclusions was presented to the Council.

8. Fish and Wildlife

As a part of its National Environmental Policy Act ("NEPA") Checklist, Cellco received comments on the proposed facility from the U.S. Department of Interior, Fish and Wildlife Service ("USFWS") and the Environmental and Geographic Information Center of the DEP. The USFWS has determined that there are no federally-listed or proposed, threatened or endangered species or critical habitat known to occur in the Huntington Facility project area. Likewise, according to the DEP, there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species at the Huntington Facility. (Cellco 1, Tab 12).

C. The Application Should Be Approved Because The Benefits Of The Proposed Facility Outweigh Any Potential Impacts

Following a determination of the probable environmental impacts of the proposed facility, Connecticut General Statutes § 16-50p requires that the Applicant demonstrate why these impacts "are not sufficient reason to deny the Application." Conn. Gen. Stat. § 16-50p(a)(3). The record establishes that the impacts associated with the proposal would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application.

As discussed above, the only potential adverse impact from the proposed towers involves "scenic values." As the record overwhelmingly demonstrates, the Huntington Facility would have minimal impacts on scenic values in the area. (Cellco 1). These limited aesthetic impacts may be,

and in this case are, outweighed by the public benefit derived from the establishment of the Huntington Facility. Unlike many other types of development, telecommunications facilities do not cause indirect environmental impacts, such as increased traffic and related pollution.

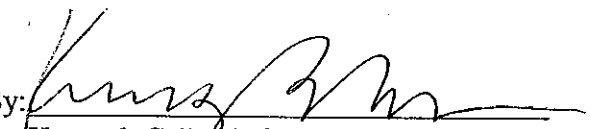
The limited aesthetic and environmental impacts of the proposed Huntington Facility can be further mitigated by the sharing of the facility. Cellco has designed the 127-foot tree tower so that it could be shared by other carriers. (Cellco 1). During the course of its meeting with municipal officials in Shelton, Cellco also offered to provide access to the tower, at no cost, to the City's emergency service providers, if a need exists.

In sum, the potential environmental impacts from the proposed Huntington Facility would be minimal when considered against the benefits to the public. These impacts are insufficient to deny the Application. The site, therefore, satisfies the criteria for a Certificate pursuant to Connecticut General Statutes § 16-50p, and the Applicant's request for a Certificate should be granted.

V. CONCLUSION

Based on the overwhelming evidence in the record, the Applicant has established that there is a need for the proposed Huntington Facility and that the environmental impacts associated with the Application would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application. Therefore, the Council should approve the Application as submitted.

Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

By: 

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