



MCM

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MESSAGE CENTER MANAGEMENT,
INC. (MCM) FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE AND OPERATION
OF A REPLACEMENT TELECOMMUNICATIONS TOWER
FACILITY AT 4 DITTMAR ROAD IN THE TOWN OF
REDDING, CONNECTICUT

DOCKET NO. _____
January 6, 2012

APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

MESSAGE CENTER MANAGEMENT, INC.
40 WOODLAND STREET
HARTFORD, CT 06105

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4. Environmental documentation including SHPO Determination, DEEP NDDB Review letter, TOWAIR Report and Power Density report
5. Visual Resource Evaluation Report
6. Noise Study
7. Correspondence with municipal agencies¹
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9. Connecticut Siting Council Application Guide

¹ A Copy of the Technical Report sent to the Towns of Redding and Bethel on August 2, 2011 is included in the Bulk Filing.

STATE OF CONNECTICUT
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IN RE:

APPLICATION OF MESSAGE CENTER MANAGEMENT, INC. (MCM) FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A REPLACEMENT TELECOMMUNICATIONS TOWER FACILITY AT 4 DITTMAR ROAD IN THE TOWN OF REDDING, CONNECTICUT

DOCKET NO. _____
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APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

I. Introduction

A. Purpose and Authority

Pursuant to Chapter 277a, § 16-50g et seq. of the Connecticut General Statutes (C.G.S.), as amended, and § 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (R.C.S.A.), as amended, Message Center Management, Inc. (“MCM” or the “Applicant”), hereby submits an application and supporting documentation (collectively, the “Application”) for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a replacement tower and modified wireless telecommunications facility (the “Facility”). The existing and proposed modifications to the Facility will continue to be located on a parcel of property at 4 Dittmar Road in the Town of Redding Connecticut. An existing tower at this location lacks the structural capacity to accommodate additional loading from new antennas and is at the end of its useful life. The construction of a replacement tower and expanded compound as proposed for this Facility will permit T-Mobile, an FCC licensed wireless carrier, to provide services in the vicinity of Route 107, Route 58 (Black Rock Turnpike) and other local roads and

homes in the surrounding area in the towns of Redding and Bethel as well as permit network upgrades for carriers currently sharing use of the existing tower.

B. Executive Summary

The existing Facility is located on an approximately 5.6 acre residential property owned by Robert Samuel Paradise with a home and modest Christmas tree farm. The existing communications facility principally consists of a 110' guyed lattice tower, equipment, shelters, and an emergency generator served by a separate on-site access drive. The existing facility is owned by Robert Paradise, the land owner, and operated by MCM and currently supports the antennas and ancillary equipment of AT&T and Sprint/Nextel with antennas extending to an overall height of 116' AGL. The new replacement tower Facility will be owned by MCM.

The existing tower's history dates back prior to cellular communications and has as its genesis a paging and communications tower approved locally by the Redding Planning & Zoning Commission ("Commission"). The current tower located on the property was the subject of a modified zoning approval by the Commission in 1992. The Applicant, MCM, acquired its operating interest in the tower and compound in 1996. In 2002, the Council approved AT&T's shared use of the tower. In 2005, Nextel proposed to extend the tower 10' and, while the Council asserted its exclusive jurisdiction over the existing tower, it denied a petition for a declaratory ruling by Nextel to extend the tower. See CSC Petition No. 735. In lieu of proceeding to file a Certificate application, Nextel filed and was approved for shared use of the existing tower by the Council in 2006. The existing tower facility is listed on the Siting Council's statutory database of approved telecommunications sites, and, as such, it is a preferred location for any shared use by wireless carriers.

MCM has received requests for additional shared use of the tower from commercial wireless carriers. In lieu of any piecemeal modifications to the tower and compound and in light

of the existing tower's structural limitations, MCM is proposing to modify and significantly upgrade the features of the Facility to accommodate additional shared use of the Facility. MCM's Application also incorporates numerous requests from abutting property owners that provided their input through a coordinated technical consultation with Natalie Ketchum, the Town of Redding First Selectman. While the Council's regulations do have procedural opportunities for tower replacement by exempt modification or a petition for a declaratory ruling, MCM decided to submit a full application to the Council given the lack of any Certificate for the existing tower facility.

The proposal for a replacement Facility includes removal of the existing guyed tower and an equipment shed, the construction of a new 120' self-supporting monopole tower with features to resemble an evergreen tree (a "monopine") extending to an overall height of 127' AGL. T-Mobile would install nine (9) antennas and six (6) tower-mounted amplifiers and six (6) remote radio units (RRUs) on a low-profile antenna platform at a centerline height of 120' AGL. AT&T and Sprint/Nextel, current tenants on the existing tower, will also be relocated to the new tower at their current centerline heights of 95' AGL and 110' AGL.

T-Mobile's unmanned equipment would be located within a 10' x 20' area within an expanded and redeveloped compound at the base of the proposed replacement tower. The new compound would be enclosed by a wood slat fence with significant evergreen screening. Vehicular access to the Facility site would remain unchanged, extending north-northeast from Dittmar Road over the existing improved twelve (12) foot wide access drive. Upgraded utilities to serve the proposed replacement Facility would extend underground to the modified compound.

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This Application represents a significant opportunity to address the need for an upgrtaded tower Facility for service to be provide to the public by commercial wireless carriers. The Application also represents an opportunity to address localized effects from the existing tower and compound which MCM committed itself to address from the outset of its consultations locally. These balancing efforts were conscientiously addressed by MCM, the Town and neighbors in 2011 through meetings, correspondence and significant dialogue as facilitated by the Town of Redding's First Selectman. In fact, the Application before the Council incorporates significant modifications to the Facility from those as first presented locally and actually includes abutting property owner preferences on various alternatives that were analyzed. MCM respectfully submits that the proposal for a modified Facility as presented in this Application best balances T-Mobile and other carrier needs for a replacement tower and the interests of abutting property owners and the Town as expressed throughout its extensive consultations.

C. The Applicant

The Applicant, MCM, is a Connecticut corporation with offices at 40 Woodland Street, Hartford, Connecticut. MCM owns and/or operates numerous facilities in the state of Connecticut, including the existing facility at 4 Dittmar Road in Redding. MCM is the tenant under a lease with the landowner and will construct, maintain and own the proposed replacement Facility.

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

Cuddy & Feder, LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Attention: Christopher B. Fisher, Esq.
Daniel M. Laub, Esq.

A copy of all correspondence shall also be sent to:

Message Center Management, Inc.
40 Woodland Street
Hartford, Connecticut 06105
Attention: Virginia King

D. Application Fee

Pursuant to R.C.S.A. § 16-50v-1a (b), a check made payable to the Siting Council in the amount of \$1,250 accompanies this Application. Included in this Application and its accompanying attachments are reports, plans and visual materials detailing the design and location for the proposed replacement Facility and the environmental effects associated therewith. A copy of the Siting Council's Community Antennas Television and Telecommunication Facilities Application Guide with page references from this Application is also included in Attachment 9.

E. Compliance with C.G.S. §16-50l (c)

MCM is not engaged in generating electric power in the State of Connecticut. Therefore, MCM's proposed replacement Facility is not subject to C.G.S. § 16-50r. Furthermore, the proposed replacement Facility has not been identified in any annual forecast reports. Accordingly, the proposed replacement Facility is not subject to § 16-50l (c).

II. Service and Notice Required by C.G.S. § 16-50l (b)

Pursuant to C.G.S. § 16-50l (b), copies of this Application have been sent by certified mail, return receipt requested, 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 included in Attachment 8. Pursuant to C.G.S. § 16-50l (b), notice of the Applicant's intent to submit this application was published on two occasions in Redding Pilot, a paper of wide circulation in the area. The text of the published legal notice is included in Attachment 8. The original publisher's

of the existing tower's structural limitations, MCM is proposing to modify and significantly upgrade the features of the Facility to accommodate additional shared use of the Facility. MCM's Application also incorporates numerous requests from abutting property owners that provided their input through a coordinated technical consultation with Natalie Ketchum, the Town of Redding First Selectman. While the Council's regulations do have procedural opportunities for tower replacement by exempt modification or a petition for a declaratory ruling, MCM decided to submit a full application to the Council given the lack of any Certificate for the existing tower facility.

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affidavits of publication will be provided to the Applicant and the Siting Council at a later date once received by the Applicant's representatives. Furthermore, in compliance with C.G.S. § 16-50l (b), notices were sent to each person or entity appearing of record as the owner of a property which abuts the premises on which the replacement Facility is proposed. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are also included in Attachment 8.

III. Statements of Need and Benefits

A. Statement of Need

As the Siting Council is aware, the United States Congress, through the adoption of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (codified in relevant part at 47 U.S.C. 151 et seq.) recognized the important public need for high quality telecommunication services throughout the United States. The purpose of the Telecommunication Act 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. Rep. No. 104-458, at 206 (1996) (Conf. Rep.). With respect to wireless communications services, 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 such authority, and preempted state or local regulatory oversight in the area of emissions as more fully set forth in 47 U.S.C. § 332(c) (7). In essence, Congress struck a balance between legitimate areas of state and/or local regulatory control over wireless infrastructure and the public interest in its timely deployment to meet the public need for wireless services.

In a December 2, 2009 proclamation, President Barack Obama recognized the importance of wireless service by proclaiming that cellular phone towers (among other assets) are critical

infrastructure vital to the United States. See Proclamation No. 8460, 74 Fed. Reg. 64, 585 (December 8, 2009). The need for timely deployment of wireless infrastructure is further supported by the FCC Declaratory Ruling, which interprets §332(c)(7)(B) of the Telecommunications Act and establishes specific time limits for decisions on applications for wireless infrastructure to state and local authorities.²

The existing tower and associated ground equipment are already integral components of the networks of FCC-licensed carriers operating in the state. The replacement Facility is needed by T-Mobile in conjunction with other existing and proposed facilities in and around the towns of Redding and Bethel. The proposed replacement Facility will allow T-Mobile, as well as the existing FCC-licensed carriers at this site, to provide enhanced wireless services to people living in and traveling through this area of the state, particularly along State Routes 107 and 58 (Black Rock Turnpike) and other local roads and homes in the surrounding area. Attachment 1 of this Application also includes a Radio Frequency (“RF”) Engineering Report and propagation plots, which identify and demonstrate T-Mobile’s specific need for a facility in this area of Redding and Bethel and it is anticipated that T-Mobile will intervene in support of this Application.

B. Statement of Benefits

Carriers have seen the public’s demand for traditional cellular telephone services in a mobile setting develop into the requirement for anytime-anywhere wireless connectivity with the ability to send and receive voice, text, image and video. Wireless devices have become integral to the telecommunications needs of the public and their benefits are no longer considered a luxury. People today are using their wireless devices more and more as their primary form of

² WT Docket No. 08-165 - Declaratory Ruling on Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance (“Declaratory Ruling”).

communication for both personal and business needs. Indeed, in the years from 2005 to 2010, the percentage of wireless only households in the United States rose from 8.4% to 26.6%.³ Modern devices allow for calls to be made, the internet to be reached and other services to be provided, irrespective of whether a user is mobile or stationary, as long as network service is available. The replacement Facility proposed by MCM will allow T-Mobile and other carriers to provide these benefits to the public.

Moreover, the proposed replacement tower and upgrades to the Facility will allow T-Mobile to provide “Enhanced 911” services to this area of the state, as required by the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, 113 Stat. 1286 (codified in relevant part at 47 U.S.C. § 222 et seq.) (“911 Act”). The purpose of this federal 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 provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care with 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 and hikers. Carriers are able to help 911 public safety dispatchers identify wireless callers’ geographical locations within several hundred feet, a significant benefit to the community associated with any new wireless site.

C. Technological Alternatives

³ CTIA Fact Sheet (2010), *available at* http://www.ctia.org/media/industry_info/index.cfm/AID/10323 *citing* Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2010, National Center for Health Statistics, December 2010.

The FCC licenses granted to wireless carriers operating in Connecticut authorize them to provide wireless services in this area of the state through deployment of a network of wireless transmitting sites. The areas of inadequate coverage to be addressed in this Application include significant portions of State Routes 107 and 58. Sections 16-50aa and 16-50p of the Connecticut General Statutes establish a statutory preference for siting new facilities at existing tower sites. Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to providing service within the target area for this site, which contains a significant wide area coverage gap and terrain challenges. The Applicant submits that there are no equally effective, feasible technological alternatives to the replacement of the existing tower facility for providing reliable personal wireless services in this area of Connecticut.

IV. Site Selection and Tower Sharing

A. Site Selection

T-Mobile's network lacks reliable radiofrequency coverage in this area of Redding and Bethel. From the outset, T-Mobile was aware of the existing facility at 4 Dittmar Road. T-Mobile's radiofrequency engineers determined that co-location at heights on the existing tower did not meet radiofrequency objectives, even if the antennas could be structurally accommodated. Accordingly, T-Mobile's representatives approached MCM with regard to developing a modified tower Facility at the Dittmar Road site.

B. Tower Sharing

T-Mobile began negotiations for a co-location at this site in 2008 and signed a lease agreement in 2009. The existing tower at 4 Dittmar Road cannot structurally accommodate any additional carriers or upgrades. The proposed replacement Facility is designed to accommodate

the antennas and equipment of T-Mobile, and will support the relocation of the antennas and equipment of AT&T and Sprint/Nextel from the existing guyed tower at their present heights. The replacement tower will also allow AT&T to implement planned LTE upgrades to its existing shared use of the tower site. Furthermore, the proposed tower would be extendable in the future to an overall height of 147' AGL for tower sharing by additional carriers if needed.

V. Modified & Tower Replacement Facility Design

The proposed Replacement Facility expands the existing compound area by approximately 2,360 square feet to the southeast. The proposed replacement tower would consist of a 127' self-supporting monopole with the appearance of an evergreen tree. It would be located in the same location as the existing tower. A geotechnical analysis already completed confirms that the site can accommodate the replacement tower. T-Mobile would install nine (9) panel antennas, six (6) tower mounted amplifiers and six (6) remote radio units (RRUs) on a low-profile platform at a centerline height of 120' AGL. The replacement tower would also accommodate AT&T's six (6) existing panel antennas at a centerline height of 95' AGL. MCM understands that AT&T anticipates an LTE upgrade which the new tower facility will be able to accommodate. Sprint/Nextel's three (3) existing flush-mounted antennas will be relocated to the new tower at a centerline height of 110' AGL and can also be upgraded in the future as needed.

The tower and equipment compound would be enclosed by an eight (8) foot tall wood slat security fence and gate. An evergreen screen consisting of approximately thirty-seven (37) arborvitae is also proposed. No modifications are proposed to the existing access road, and utilities, while in place, will require some modest upgrades to serve the replacement Facility.

Attachment 3 contains the specifications for the proposed replacement Facility, including an abutters map, site access maps, a compound plan, tower elevation, and other relevant details of the proposed replacement Facility. Also included as Attachment 4 is a comparative Visual

Resource Evaluation Report. Some of the relevant information included in Attachments 3 and 4 reveals that:

- Minimal grading and clearing of the existing compound area would be required for the construction of the proposed replacement Facility;
- The proposed replacement Facility will have no impact on water flow, water quality, or air quality;
- The year-round visual impact to the surrounding community within a two-mile radius is limited to less than 1%, or 17 acres, of the total study area;
- Topography and vegetation will serve to screen or otherwise limit visibility of the proposed tower from a large portion of the view shed; and
- The proposed tower will not be seen from any of the historic or scenic visual receptors listed on the view shed map of the Visual Analysis report submitted in Attachment 5, including the Putnam Memorial State Park, which is listed in the National Register of Historic Places.

VI. Environmental Compatibility

Pursuant to C.G.S. §16-50p (a) (3) (B), the Siting Council is required to find and determine as part of the Application process any probable 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, the proposed replacement Facility will be constructed in compliance with applicable regulations and guidelines, and best practices will be followed to ensure that the construction of the proposed replacement Facility will not have a significant adverse environmental impact. In

addition, the regular operation and monthly maintenance of the Facility will not have a significant environmental impact.

A. Visual Assessment

Included in Attachment 5 is a Visual Resource Evaluation Report, which contains a view shed map and photo simulations of off-site views. It is anticipated that approximately only 1% of the 8,042-acre study area will have at least partial year-round visibility of the proposed replacement Facility above the tree canopy. It is further anticipated that visibility of the structure will be principally limited to areas located within a one-half-mile radius of the proposed replacement Facility.

Topography and vegetation would obscure, partially or totally, views from several locations. As shown in the report and photo simulations, areas of year-round visibility of the proposed replacement Facility are expected primarily within a close proximity. It is anticipated that the proposed replacement Facility will be visible from a total of five (5) residential properties year-round, and an additional five (5) residential properties during leaf-off conditions. Of note, most if not all of these properties have seasonal or year-round views of the existing facility.

Weather permitting, MCM will raise a balloon with a diameter of at least three (3) feet at the proposed site on the day of the Siting Council's first hearing session on this Application, or at a time otherwise specified by the Siting Council.

B. Solicitation of State and Federal Agency Comments

Various consultations consultations and analyses for potential environmental impacts are summarized and included in Attachments 4,5, 6 and 7. MCM submitted requests for review from federal and state entities including the Connecticut Department of Environmental Protection and the Connecticut State Historic Preservation Officer (SHPO). Correspondence

from SHPO dated May 12, 2011 found that the proposed replacement Facility would have “No Effect” on historic resources and is included in Attachment 4.

Also submitted in Attachment 4 is correspondence from the state Department of Energy and Environmental Protection (DEEP) dated June 27, 2011, concluding that no endangered or threatened species habitat was identified based on a review of the Connecticut DEEP’s Natural Diversity Database (NDDDB) mapping. As required by statute, this Application is being served on state and local agencies, which may choose to comment on the Application prior to the close of the Siting Council’s public hearing.

C. Power Density

In August of 1996, the FCC adopted a standard for Maximum Permissible Exposure (MPE) for RF emissions from telecommunications facilities like the one proposed in this Application. To ensure compliance with the applicable standards, a maximum power density report is included herein as part of Attachment 4. The report concludes that the calculated worst-case emissions from the proposed replacement Facility are 36.98% of the MPE standard.

D. Other Environmental Factors

The proposed replacement Facility would be unmanned, requiring monthly maintenance visits approximately one hour long. Carriers that maintain antennas and equipment at an approved facility monitor same 24 hours a day, seven days a week from a remote location. The proposed replacement Facility does not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Furthermore, the proposed replacement Facility will neither create nor emit any smoke, gas, dust, other air contaminants, noise, odors, nor vibrations other than those created by any heating and ventilation equipment installed by carriers. A study was recently completed and confirms the existing Facility produce low levels of sound and that the modifications as proposed will not create noise impacts.

Overall, the construction and operation of MCM's proposed Facility will not have a significant impact on the air, water, or noise quality of the area.

E. National Environmental Policy Act Review

MCM has evaluated the project in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852(codified in relevant part at 42 U.S.C § 4321 et seq.) (NEPA). The existing site was not identified as a wilderness area, wildlife preserve, National Park, National Forest, National Parkway, Scenic River, State Forest, State Designated Scenic River or State Gameland. Furthermore, according to the site survey and field investigations, no federally regulated wetlands or watercourses or threatened or endangered species will be impacted by the proposed Facility.

F. Air Navigation

MCM utilized the FCC's TOWAIR program to determine if any of the proposed replacement Facility would require registration with the Federal Aviation Administration (FAA). The TOWAIR program results for the proposed replacement Facility, a copy of which is included in Attachment 4, indicate that registration with the FAA is not required and that the proposed replacement Facility is not a potential air navigation obstruction or hazard warranting FAA review. Accordingly, no FAA lighting or marking would not be required for the monopine tower proposed in this Application.

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

Pursuant to the Siting Council's Application Guide, a narrative summary of the consistency of the project with the local municipality's zoning and wetland regulations and plan of conservation and development is included in this section. A description of the zoning

classification of the site and the planned and existing uses of the proposed site location are also detailed in this section.

A. Redding’s Plan of Conservation and Development

The Town of Redding Plan of Conservation & Development (“Plan”), effective December 2008, is included in the Bulk Filing. The Plan does not directly address wireless telecommunication facilities. The Plan does, however, recognize that advances in telecommunication technology and the services of wireless telecommunication providers have spurred a trend toward integrated work and residential settings.

B. Redding’s Zoning Regulations and Zoning Classification

Section 5.19 of the Town of Redding Zoning Regulations sets forth the standards for communications tower siting, site design and setback requirements. Consistency of the proposed replacement Facility with these standards is illustrated in the table below.

Zoning Regulation	Standard or Preference	Proposed Replacement Facility
§ 5.19.1	FCC-licensed wireless facilities are permissible in Residential Zones.	The site is zoned R-2 and currently hosts a wireless facility.
§ 5.19.4	Provides a taxonomy of properties. Existing towers within Residential Zones are listed as “Class 3.”	The existing and proposed replacement Facility is a “Class 3” facility.
§ 5.19.5	Excludes from various zoning standards and classification collocations at existing sites.	The proposed Facility is the use of an existing wireless site in the form of a replacement tower.
§ 5.19.5	Shall not be located within 250’ of a residence.	The closest residence to the existing facility is located on site approximately 195’ from the equipment compound.
§ 5.19.5	Shall not be located within 100’ of a flagged wetland.	There is no flagged wetland within 100’ of the proposed replacement Facility or on the proposed site.
§ 5.19.5	Shall not be located within 200’ of the outer riparian zone of any perennial stream, watercourse, or vernal pool.	The site is not within 200’ of the outer riparian zone of any perennial stream, watercourse or vernal pool.
§ 5.19.5	Shall not be located within 500’ of a Historic District or property listed on the State or Federal Register of Historic Places	The site is not within 500’ of a Historic District or property listed on the State or Federal Register of Historic Place. See

		SHPO Letter, Attachment 4.
§ 5.19.5	Shall not be located within the habitat of a listed rare or endangered wildlife species or rare plant species.	The site is not within the habitat of a listed rare or endangered wildlife species or rare plant species, See DEEP letter included in Attachment 4
§ 5.19.6	All-weather access roadway with parking, screening of parking and on-site structures	Access to the site is over an existing improved all-weather access road. Existing buildings, topography, trees, and proposed wood-slat fence and evergreen screening provide significant screening of the replacement Facility from surrounding locations.
§ 5.19.6	No night lighting of tower except for low-level minimum intensity lighting for security walks and fencing etc.	No lighting of the tower is proposed.
§ 5.19.6	Class 3 wireless facilities limited to 200' AGL.	The height of the proposed replacement monopine tower is 127' AGL, with the potential to be extended to 147' AGL.

C. Planned and Existing Land Uses

The Facility has been located on an approximately 5.6 acre parcel with a residence and other uses for over twenty years. Properties immediately surrounding the subject site include low-density single family residential homes and open space. Consultation with municipal officials did not indicate any planned changes to the existing or surrounding land uses. Copies of the Town of Redding’s Zoning Code, Inland Wetlands Regulations, Zoning Map and Plan of Conservation and Development are included in the Bulk Filing.

D. Redding’s Inland Wetlands and Watercourses Regulations

The Town of Redding’s Inland Wetlands Regulations (“Local Wetlands Regulations”) regulate certain activities conducted in “Wetlands” and “Watercourses” as defined therein. In this case, a review of available information regarding the site through federal, state and local databases and a field survey did not indicate a wetland on the property. All appropriate sediment

and erosion control measures will be designed and employed 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 replacement Facility. Therefore, the Applicant does not anticipate an adverse impact on any wetland or water resource.

VIII. Consultations with Local Officials

C.G.S. § 16-50l (e) requires an applicant to consult with the 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 facility. The Applicant conducted outreach to Redding's First Selectman early in 2011 about its plans to replace the tower and modify the Facility to support tower sharing. At preliminary meetings, MCM representatives shared information about the need to replace the Facility and provided the First Selectman with a visual analysis of a proposed lattice tower replacement on May 5, 2011. As part of an ongoing dialogue, First Selectman Ketcham inquired about various alternative tower designs and an updated visual analysis was forward to First Selectman Ketcham on May 24, 2011, which included photo simulations of a monopine tower.

The Applicant formally submitted a Technical Report to the First Selectmen of Redding and Bethel on August 2, 2011. Bethel sought no consultation from MCM. In Redding, the First Selectman convened a series of meetings with abutting property owners and MCM continued to elicit input on various alternative tower locations on the property, tower forms, and screening. Abutting property owners shared with MCM various requests and ultimately a list of their preferences should a modified Facility be pursued by MCM in an Application to the Council. MCM's Application largely incorporates these requests in confining the tower replacement to the

immediate vicinity of the tower site, a monopine design, residential character fencing with significant landscaping and other details as requested by abutting property owners through the Town's First Selectman.

IX. Estimated Cost and Schedule

A. Overall Estimated Cost

The total estimated cost of construction for the proposed replacement Facility is represented in the table below.

Requisite Component:	Cost (USD)
Tower & Foundation	135,000
Site Development	27,500
Utility Installation	27,000
Facility Installation	30,000
Antennas and Equipment	TBD by T-Mobile
Total Cost (MCM)	219,500

B. Overall Scheduling

Site preparation work would commence immediately following Siting Council approval of a Development and Management ("D&M") Plan and the issuance of a Building Permit by the Town of Redding. The site preparation phase is expected to be completed within 4 weeks. Removal of the existing tower and installation of the replacement tower is expected to take four weeks. MCM anticipates installation of carriers antennas and equipment as needed will take approximately two weeks making the duration of the total construction schedule is approximately 7-8 weeks. Carriers typically require an additional two weeks post-construction for facility integration and system testing.

X. Conclusion

This Application and the accompanying materials and documentation clearly demonstrate that a public need for the provision of wireless services to the public exists in the northern

portion of the Town of Redding and the southern portion of the town of Bethel, including significant portions of State Routes 107 and 58 and the surrounding areas. T-Mobile, specifically, has gaps in reliable wireless coverage in and around this area of the state. The Applicant respectfully submits that the public need for the proposed replacement Facility outweighs any potential environmental effects resulting from the replacement of the existing facility at the site, which this Application demonstrates is insubstantial. Accordingly, the Applicant respectfully requests that the Siting Council grant a Certificate of Environmental Compatibility and Public Need to MCM for the replacement and modification of the existing wireless telecommunications facility at 4 Dittmar Road in the Town of Redding.

Respectfully Submitted,

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