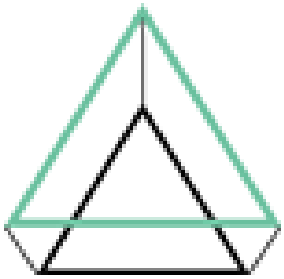

MESSAGE CENTER MANAGEMENT, INC. (MCM)

NEW CINGULAR WIRELESS PCS, LLC (AT&T)

Application to the

State of Connecticut Siting Council

For a Certificate of

Environmental Compatibility and Public Need

—GLASTONBURY FACILITY—

Docket No. _____

MESSAGE CENTER MANAGEMENT, INC.

40 WOODLAND STREET

HARTFORD, CT 06105

NEW CINGULAR WIRELESS PCS, LLC (AT&T)

500 ENTERPRISE DRIVE

ROCKY HILL, CT 06067

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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") and New Cingular Wireless PCS, LLC ("AT&T) (together the "Applicants"), submit this application and supporting documentation (collectively, the "Application") for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications tower facility (the "Facility"). The Facility is proposed on a 8.91 acre parcel of land owned by John J. & Joyce A. Vullo Trustees and located on Candlewood Road, Glastonbury (the "Parcel") which is part of a larger assemblage of parcels and an equestrian facility known as Seven J's Farm (the "Farm"). AT&T, an FCC licensed wireless carrier, will provide services form the Facility to a large portion of northern Glastonbury around Candlewood Road, Griswold Street, Addison Road and other local roads and neighborhoods in Glastonbury and southern portions of East Hartford.

B. Executive Summary

There are several areas in the Town of Glastonbury ("Town") where a new facility is required for AT&T to provide reliable wireless services to the public. Given the number and location of AT&T site searches ongoing throughout Glastonbury, AT&T asked to meet with Town officials in the Summer of 2013. In an initial meeting with Town officials, AT&T identified for the Town that it had secured opportunities to share use of two existing wireless communications facilities in the community, with the remaining search areas in Glastonbury noted as likely requiring new towers to serve the public.

AT&T's initial meeting with the Town was collaborative with both parties agreeing that further meetings were warranted. In fact, as a result of its meeting(s) with Town officials, AT&T was able to shift one of its proposed facilities in an adjacent site search area to a commercial rooftop location in lieu of a new tower facility on property AT&T had leased and not yet filed a technical report with the Town. For other search rings, AT&T evaluated several potential facility locations in consultation with Town officials in a series of meetings where technical information was shared by AT&T and the Town GIS database used to evaluate potential tower facility locations.

Town officials and AT&T next agreed to explore municipal owned parcels of land as potential tower siting options given the number and location of new tower sites AT&T had identified as likely required throughout Glastonbury.

Additionally, MCM, which had independently engaged in similar discussions with Town officials, was asked to evaluate several of the preliminarily identified parcels with AT&T and the Town. One such site search area includes the facility proposed in this Application for AT&T to serve an area of northern Glastonbury and southern East Hartford.

As part of AT&T's overall discussions with Town officials in 2013, the company noted that MCM was in the process of leasing land at Seven J's Farm for a potential tower site that AT&T would consider utilizing. At that time, AT&T specifically asked Town officials about nearby Addison Park, one of the only other large parcels of land in this part of the community. Town officials subsequently agreed to explore Addison Park as an "option" without any commitment. Addison Park, as a potential tower site location, was thereafter incorporated into the ongoing assessment of numerous municipal properties by AT&T, MCM and Town officials.

In late 2013 and the first half of 2014, MCM and Town officials conducted site visits and prepared concept plans for potential tower site locations on various municipal properties. AT&T further qualified locations technically and several were presented to the Glastonbury Town Council for consideration as part of noticed community meetings. Ultimately, the Town Council, while acknowledging the need for improved wireless services in Glastonbury, decided

not to make municipal properties available to MCM and AT&T for the provision of wireless services to the public.

In June of 2014, MCM and AT&T submitted a technical report to the Town of Glastonbury for this specific tower project at Seven J's Farm. At the Town's request, and despite passage of the 90 day consultation period, MCM and AT&T conducted a community meeting in October of 2014. No specific municipal preferences or alternatives were identified by the Town of Glastonbury.

The tower is proposed as a 120' monopole. Evergreen style branching to camouflage the platforms and antennas (i.e. a "monopine") is also included in the facility design, but subject to an ongoing discussion with the State Historic Preservation Officer ("SHPO"). The "monopine" design is nevertheless, a specific request of the property owner and would be consistent with MCM's facility in the adjacent community of East Hartford. MCM and AT&T would construct either tower design alternative.

The remainder of the proposed facility is otherwise a typical tower site configuration with a 3,100 s.f. equipment compound, AT&T equipment shelter, emergency power generator and space for shared use by other wireless carriers. Vehicle access to the facility would be provided from Candlewood Road over an existing bituminous concrete driveway a distance of approximately 680' and a proposed gravel access driveway of approximately 30'

to the proposed compound. Utility connections would be routed underground from an existing utility pole #144 located on Candlewood Road.

Figure 1: Aerial Photomap of the Facility Location

AT&T anticipates the Facility would provide reliable service to the surrounding neighborhood including thousand(s) of residents, local roads and places of public assembly like Addison Park.

C. The Applicants

Applicant Message Center Management, Inc. ("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. MCM is a lessee pursuant to an agreement with John J. & Joyce A. Vullo Trustees. MCM will construct, maintain and own the proposed Facility on a portion of what is known as Seven J's Farm and would be the Certificate holder.

Applicant New Cingular Wireless PCS, LLC ("AT&T") is a Delaware limited liability company with an office at 500 Enterprise Drive, Rocky Hill, Connecticut 06067. The company's member corporation is licensed by the Federal Communications Commission ("FCC") to construct and operate a personal wireless services system, which has been interpreted as a "cellular system", within the meaning of CGS Section 16-50i(a)(6). The company does not conduct any other business in the State of Connecticut other than the provision of personal wireless services under FCC rules and regulations.

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: Daniel M. Laub, Esq.

Christopher B. Fisher, Esq.

A copy of all correspondence shall also be sent to:

Message Center Management, Inc.

40 Woodland Street

Hartford, Connecticut 06105

Attention: Virginia King

AT&T

500 Enterprise Drive

Rocky Hill, Connecticut

Attention: Michele Briggs

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 Facility and the environmental effects, if any, 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 15.

E. Compliance with C.G.S. §16-50/ (c)

Neither of the Applicants is engaged in generating electric power in the State of Connecticut. Therefore, the Facility is not subject to C.G.S. § 16-50r. Furthermore, the proposed Facility has not been identified in any annual

forecast reports. Accordingly, the proposed Facility is not subject to §16-50/ (c).

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

Pursuant to C.G.S. § 16-50/ (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 14. Pursuant to C.G.S. § 16-50/ (b), notice of the Applicant's intent to submit this application was published on two occasions in The Glastonbury Citizen, a paper of wide circulation in the area.[1] The text of the published legal notice and publisher's affidavits of publication are included in Attachment 13. Furthermore, in compliance with C.G.S. § 16-50/ (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 Facility is proposed. Additional notices were mailed as a courtesy to owners of property which do not abut the parcel where the Facility is proposed but are near or neighboring other holdings related to Seven J's Farm. 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 13.

III. Statements of Need and Benefits

A. Statement of Need

[1] An initial published notice was corrected.

1. United States Policy & Law

United States policy and laws continue to support the growth of wireless networks. In 1996, Congress recognized the important public need for high quality wireless communications service throughout the United States in part through adoption of the Telecommunications Act (the "Act"). A core purpose of the 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 Act 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's interest in its timely deployment to meet the public need for wireless services.

Nearly two decades later, the current White House administration, Congress and the FCC continue to take a strong stance and act in favor of the provision of wireless service to all Americans. In December 2009, President Obama

issued Proclamation 8460, which included wireless facilities within his definition of the nation's critical infrastructure and declared in part:

> Critical infrastructure protection is an essential element of a resilient and secure nation. Critical infrastructure are the assets, systems, and networks, whether physical or virtual, so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety. From water systems to computer networks, power grids to cellular phone towers, risks to critical infrastructure can result from a complex combination of threats and hazards, including terrorist attacks, accidents, and natural disasters.[2]

President Obama further identified the critical role of robust mobile broadband networks in his 2011 State of the Union address.[3] In 2009, The Congress directed the FCC to develop a national broadband plan to ensure that every American would have access to "broadband capability" whether by wire or wireless. What resulted in 2010 is a document entitled "Connecting America:

[2] Presidential Proclamation No. 8460, 74 C.F.R. 234 (2009).
[3] Cong. Rec. H459 (Jan. 25, 2011), also *available at* http://www.whitehouse.gov/the-press-office/2011/01/25/remarks-president-state-union-address. Specifically the President stressed that in order "[t]o attract new businesses to our shores, we need the fastest, most reliable ways to move people, goods, and information—from high-speed rail to high-speed Internet."

The National Broadband Plan" (the "Plan").[4] Although broad in scope, the Plan's goal is undeniably clear:

> [A]dvance consumer welfare, civic participation, public safety and homeland security, community development, health care delivery, energy independence and efficiency, education, employee training, private sector investment, entrepreneurial activity, job creation and economic growth, and other national purposes.[5] [internal quotes omitted]

The Plan notes that wireless broadband access is growing rapidly with "the emergence of broad new classes of connected devices and the rollout of fourth-generation (4G) wireless technologies such as Long Term Evolution (LTE) and WiMAX."[6] A specific goal of the Plan is that "[t]he United States should lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation." [7]

In April 2011, the FCC issued a Notice of Inquiry concerning the best practices available to achieve wide-reaching broadband capabilities across the nation including better wireless access for the public.[8] The public need for timely

[4] Connecting America: The National Broadband Plan, Federal Communications Commission (2010), *available at* http://www.broadband.gov/plan/.
[5] Id. at XI.
[6] Id. at 76.
[7] Id. at 25.
[8] FCC 11-51: Notice of Inquiry, In the Matter of Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless

deployment of wireless infrastructure is further supported by the FCC's Declaratory Ruling interpreting § 332(c)(7)(B) of the Telecommunications Act and establishing specific time limits for decisions on land use and zoning permit applications.[9] More recently, the importance of timely deployment of wireless infrastructure to American safety and economy was confirmed in the Middle Class Tax Relief and Job Creation Act of 2012, which included a provision, Section 6409, that preempts a discretionary review process for eligible modifications of existing wireless towers or base stations.[10]

2. United States Wireless Usage Statistics

Over the past thirty years, wireless communications have revolutionized the way Americans live, work and play.[11] The ability to connect with one another in a mobile environment has proven essential to the public's health, safety and welfare. As of June 2012, there were an estimated 321.7 million wireless subscribers in the United States.[12] Wireless network data traffic was reported at 341.2 billion megabytes, which represents a 111% increase from the prior year.[13] Other statistics provide an important sociological understanding of how critical access to wireless services has become. In 2005, 8.4% of households in the United States had cut the cord and

Facilities Siting, available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0407/FCC-11-51A1.pdf.

[9] 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").

[10] Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §6409 (2012), available at http://gpo.gov/fdsys/pkg/BILLS-112hr3630enr/pdf/BILLS-112hr3630enr.pdf; see also H.R. Rep. No. 112-399 at 132-33 (2012)(Conf. Rep.), available at http://www.gpo.gov/fdsys/pkg/CRPT-112hrpt399/pdf/CRPT-112hrt399.pdf.

[11] See, generally, History of Wireless Communications, *available at* http://www.ctia.org/media/industry_info/index.cfm/AID/10388 (2011)

[12] CTIA's Wireless Industry Indices: Semi-Annual Data Survey Results, A Comprehensive Report from CTIA Analyzing the U.S. Wireless Industry, Mid-Year 2012 Results (Semi-Annual Data Survey Results). *See also* "CTIA-The Wireless Association Semi-Annual Survey Reveals Historical Wireless Trend" *available at http://www.ctia.org/media/press/body.cfm/prid/2133.*

[13] Id.

were wireless only.[14] By 2013, that number grew exponentially to an astonishing 39% of all households.[15] Connecticut in contrast lags behind in this statistic with 20.6% wireless only households.[16]

Wireless access has also provided individuals a newfound form of safety. Today, approximately 70% of *all* 9-1-1 calls made each year come from a wireless device.[17] Parents and teens have also benefited from access to wireless service. In a 2010 study conducted by Pew Internet Research, 78% of teens responded that they felt safer when they had access to their cell phone.[18] In the same study, 98% of parents of children who owned cell phones stated that the main reason they have allowed their children access to a wireless device is for the safety and protection that these devices offer.[19]

Wireless access to the internet has also grown exponentially since the advent of the truly "smartphone" device. Cisco recently reported that global mobile data traffic grew 69% in 2014.[20] In 2014, global mobile data traffic alone was nearly thirty times greater than all global Internet traffic in 2000.[21] Indeed, with the recent introduction of tablets, netbooks and wearable devices to the marketplace and increased M2M ("Machine to Machine") connectivity, this type of growth is expected to persist with Cisco projecting that mobile data traffic will grow at a compound annual growth rate (CAGR) of 61% from 2013 to 2018.[22]

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[14] CTIA Wireless Quick Facts, *available at* http://www.cita.org/your-wireless-life/how-wireless-works/wireless-quick-facts *citing Early Release of Estimates from the National Health Interview Survey, January-June 2013, National Center for Health Statistics*, December 2013.
[15] Id.
[16] *Early Release of Estimates from the National Health Interview Survey, January-June 2013, National Center for Health Statistics*, December 2013. *See also* "Wireless Substitution: State-level Estimates From the National Health interview Survey, 2012", National Health Statistics Report, No. 70 (Dec. 18, 2013).
[17] Wireless 911 Services, FCC, *available at* http://www.fcc.gov/guides/wireless-911-services
[18] Amanda Lenhart, *Attitudes Towards Cell Phones*, Pew Research, *available at* http://www.pewinternet.org/Reports/2010/Teens-and-Mobile-Phones/Chapter-3/Overall-assessment-of-the-role-of-cell-phones.aspx
[19] Id.
[20] Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2014–2019 (Feb. 3, 2015).
[21] Id.
[22] Id.; *see also* Connecticut Siting Council, 2013 Connecticut State-Wide Telecommunications Coverage Plan (Feb. 6, 2014).

3. Site Specific Public Need

The Facility proposed in this Application is an integral component of AT&T's network in its FCC licensed areas throughout the state. There are significant gaps in reliable service for wireless carriers in Glastonbury including local roads, homes, businesses, and schools in the surrounding area. A deficiency in coverage is evidenced by the inability to adequately and reliably transmit/receive quality calls and/or utilize data services offered by the network. The proposed facility, in conjunction with other existing, proposed and approved facilities in and around Glastonbury is needed by AT&T to provide its wireless services to people living in and traveling through this area of the state. Attachment 1 of this Application includes a Radio Frequency ("RF") Engineering Report with propagation plots and other information which identifies and demonstrates the specific need for a facility in this area of Connecticut to serve the public and meet its need and demand for wireless services.

B. Statement of Benefits

Carriers have seen the public's demand for traditional cellular telephone services in a mobile setting develop into a requirement for anytime-anywhere wireless connectivity with critical reliance placed on the ability to send and receive, voice, text, image and video. Provided that network service is available, modern devices allow for interpersonal and internet connectivity,

irrespective of whether a user is mobile or stationary, which has led to an increasing percentage of the population to rely on their wireless devices as their primary form of communication for personal, business and emergency needs. The proposed facility would allow AT&T and other carriers to provide these benefits to the public that are not offered by any other form of communication system.

Moreover, AT&T will provide "Enhanced 911" services from the Facility, 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) ("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.

In 2009, Connecticut became the first state in the nation to establish a statewide emergency notification system. The CT Alert ENS system utilizes the state Enhanced 911 services database to allow the Connecticut Department of Homeland Security and Connecticut State Police to provide targeted alerts to the public and local emergency response personnel alike during life-threatening emergencies, including potential terrorist attacks, Amber Alerts and natural disasters. Pursuant to the Warning, Alert and Response Network Act, Pub. L. No. 109-437, 120 Stat. 1936 (2006) (codified at 47 U.S.C. § 332(d)(1) (WARN), the FCC has established the Personal Localized Alerting Network (PLAN). PLAN will require wireless service providers to issue text message alerts from the President of the United States, the U.S. Department of Homeland Security, the Federal Emergency Management Agency and the National Weather Service using their networks that include facilities such as the one proposed in this Application. Telecommunications facilities like the one proposed in this Application enable the public to receive e-mails and text messages from the CT Alert ENS system on their mobile devices. The ability of the public to receive targeted alerts based on their geographic location at any given time represents the next evolution in public safety, which will adapt to unanticipated conditions to save lives.

C. Technological Alternatives

The FCC licenses granted to AT&T authorize it to provide wireless services in this area of the state through deployment of a network of wireless transmitting sites. Repeaters, microcell transmitters, distributed antenna systems (DAS) and other types of transmitting technologies are not a practicable or feasible means to providing service within the service area for this site. These technologies are better suited for specifically defined areas where new coverage is necessary, such as commercial buildings, shopping malls, and tunnels, or to address capacity. Closing the coverage gaps and providing reliable wireless services in northern Glastonbury requires a tower site that can provide reliable service over a footprint that spans several thousand acres. The Applicant submits that there are no equally effective technological alternatives to the construction of one of the proposed facilities for providing reliable personal wireless services in this area of Connecticut.

IV. Site Selection

A. Site Selection

In this search area in Glastonbury, a new tower is necessary to meet AT&T's objective of providing reliable service to the public. Both MCM and AT&T have been active over the past several years in identifying possible siting opportunities for wireless facilities in Glastonbury. AT&T has had meetings and consultations with Town officials at various points in time dating back more

recently to 2013 to discuss its overall service in the entire Town of Glastonbury. These discussions included a review of over half a dozen different areas of Glastonbury where a new facility would be needed for AT&T and possibly other carriers to reliably serve the public.

As part of this specific site search area, it is noted that adjacent AT&T site search rings in Glastonbury all involve existing infrastructure sites. AT&T proposed site #3422 to the southeast involves an existing power mount tower and CL&P high tension power line facility located at 1492 Hebron Avenue in Glastonbury. AT&T's proposed site #3405 to the south was relocated to a commercial rooftop location as a partial alternative to a proposed new 180' monopole in the community. AT&T has identified and is proposing to utilize surrounding existing wireless sites. Nevertheless, even with such improvements to its network, another AT&T transmitting facility in the area of Seven J's Farm and Addison Park in Glastonbury is required to provide reliable wireless services.

MCM has similarly been active over the past few years identifying potential siting solutions for wireless carriers in Glastonbury and in discussing options with Town officials. MCM is generally aware of wireless carrier siting needs in Glastonbury and as worked on several projects in the community and adjacent East Hartford. Indeed, the facility proposed and approved in Docket 436 at 465 Hills Street met one of AT&T's other siting needs in East Hartford.

This specific site search area in northern Glastonbury is predominated by residences and a few larger non-residential parcels of land in the area. AT&T and MCM did not include parcels used principally as a residence in their site search. Consultations with Town officials included exploration of municipal property in Addison Park as a potential tower site location which was not made available for leasing by the Town. MCM explored other properties including the subject property off of Candlewood Road and concluded that Seven J's Farm was an appropriate property on which to site a tower facility and present in this Application to the Siting Council. The Applicants know of no other alternatives that would better meet the State's tower siting criteria set forth in Section 16-50p of the Connecticut General Statutes.

B. Tower Sharing

The proposed Facility is designed to accommodate the antennas and equipment of AT&T and up to three (3) additional wireless carriers to provide network services to the area.

V. Facility Design

The proposed Facility is a self-supporting 120' AGL monopole tower designed to accommodate "monopine" branching, platforms and the antennas and equipment of FCC licensed wireless carriers. AT&T would install up to twelve (12) panel antennas at a centerline height of approximately 116' AGL and

some additional equipment on the tower. An AT&T 11.5' x 16' equipment shelter would be installed at the tower base on a 12' x 24' concrete pad along with provisioning for a generator. AT&T's equipment shelter and space for the equipment of other carriers will be enclosed by an eight (8) foot tall chain link fence. Approximately 203 CY of materials will be removed as part of trenching activities and 62 CY of broken stone for the compound and driveway construction.

Vehicle access to the facility would be provided from Candlewood Road over an existing bituminous concrete driveway a distance of approximately 680' and a proposed gravel access driveway of approximately 30' to the proposed compound. Utility connections would be routed underground from an existing utility pole #144 located on Candlewood Road.

Attachments 3 and 4 contain the specifications for the proposed Facility, including an abutters map, site access maps, a compound plan, tower elevation, and other relevant details of the proposed Facility. Also included as Attachment 8 is a Visual Assessment and Analysis. Some of the relevant information included in Attachments 5, 6, 7 and 8 reveals that:

- No tree removal would be required for the construction of the proposed Facility;
- The proposed Facility will have no impact on water flow, water quality, or air quality;

- Areas from where the proposed Facility would be visible above the tree canopy year-round comprise a total of approximately 71 acres; and
- When the leaves are off the trees, seasonal views through intervening tree trunks and branches are anticipated to occur over some locations within an area of an additional ±119 acres which is mostly undeveloped/forested land.

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 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 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 8 is a visual assessment and analysis which contain a view shed map and photo simulations of off-site views. It is anticipated that

approximately 71 acres of the 8,042-acre study area will have visibility of the proposed Facility above the tree canopy year round. In general, year-round views of portions of the Facility are limited to select locations within a ±0.25 mile area (extending a little farther to the west). Only ±119 additional acres will experience seasonal views generally through intervening branches and tree trunks during leaf-off conditions. Topography and vegetation would help obscure, partially or totally, views of the Facility from most locations in the study area.

Weather permitting, the Applicants 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 and analyses for potential environmental impacts are summarized and included in Attachments 9 and 10. The Applicant's consultants submitted requests for review from federal and state entities including the Connecticut Department of Energy and Environmental Protection (CTDEEP) and the Connecticut State Historic Preservation Officer (SHPO). CTDEEP has some record of the eastern box turtle, a state species of special concern, in the vicinity of this project. A turtle protection plan during construction can be incorporated into any development and management plan

for the Facility. No threatened or endangered species were otherwise identified as part of the Applicant's consultations with state and federal agencies.

The Applicant does not anticipate any impact to historic resources. Consultation with SHPO indicated no adverse effect associated with the Facility. SHPO's correspondence did include a "condition" though that would otherwise exclude a monopine from further consideration. No reason for this condition was proffered by SHPO and MCM's consultants have sought clarification including that the condition be eliminated given the lack of any visual effect on listed or eligible historic resource as noted in the visual analysis included in Attachment 8. As required by statute, this Application is being served on state and local agencies, including SHPO, 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 7. The report concludes that the calculated worst-case emissions from AT&T's antennas are 5.59% of the MPE standard.

D. Other Environmental Factors

The proposed 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 Facility does not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Furthermore, the proposed 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. During power outages an emergency generator would be utilized from which some emissions and noise would be produced. Overall, the construction and operation of the proposed Facility will not have a significant impact on the air, water, or noise quality of the area.

E. National Environmental Policy Act Review

The Applicants have 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

Information regarding the proposed Facility was analyzed using the Notice Criteria tool of the Federal Aviation Administration (FAA). The FAA has issued a Determination of No Hazard to air navigation which is provided in Attachment 4.

VII. Consistency with the Town of Glastonbury 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. Glastonbury's Plan of Conservation and Development

The Town of Glastonbury Plan of Conservation & Development ("Plan"), effective September 23, 2007, is included in the Bulk Filing. The Plan addresses wireless telecommunication facilities. The Plan promotes the utilization of existing structures and buildings for new communication sites. Some specific policies include that in the Town's "rural planning area #3", multiple use towers and multi-users on single towers be clustered in designated

areas such as Birch Mountain. In the Town's "village center planning area #5", the plan encourages limiting any new towers permitted by the CSC to a single location, strongly promoting the use of existing buildings for antennas. No specific policy was identified in the Town's Plan for purposes of this tower facility proposed by MCM and AT&T.

B. Glastonbury's Zoning Regulations

Section 3.21 of the Town of Glastonbury Building Zone Regulations addresses communications tower setback requirements. Consistency of the proposed Facility with these standards is in the table below.

Zoning Regulation	**Standard or Preference**	**Proposed Facility**
§ 3.21	Towers, when permitted shall be setback from all abutting streets and adjacent properties not less than 1 ½ times the height of the tower.	The distance to adjacent property lines is as follows: 883 feet, 179 feet, 357 feet, and 132 feet. The 132' setback to the southern property is noted to be an adjoining parcel that is part of Seven J's Farm.

C. Planned and Existing Land Uses

The Facility is proposed on a 8.91 acre parcel that is part of a larger assemblage of land developed as Seven J's Farm, a horse farm, improved with

pastures, barns and stables. Properties immediately surrounding the subject site include residential homes, Addison Park and open space. Consultation with municipal officials did not indicate any planned changes to the existing or surrounding land uses. Copies of the Glastonbury Building-Zone Regulations, Inland Wetlands Regulations, Zoning Map and Plan of Conservation and Development are included in the Bulk Filing.

D. Glastonbury's Inland Wetlands and Watercourses Regulations

Glastonbury's Inland Wetlands Regulations ("Local Wetlands Regulations") regulate certain activities conducted in "Wetlands" and "Watercourses" as defined therein. The Town's upland review areas include lands within 100' of a regulated wetland or watercourse. In this case, the proposed compound and edge of the proposed gravel driveway extension are approximately 50' from what has been identified as "Wetland 1". Wetland 1 is a hillside seep/intermittent stream system associated with an open water pond located on the Parcel.

No direct impact to wetlands and watercourses would be associated with the proposed development of the tower Facility. Due to Wetland 1's close proximity to the existing access driveway, the proposed underground utility route will be positioned to avoid any direct wetland impacts. Appropriate sedimentation and erosion controls which will be designed and employed in accordance with the 2002 Connecticut Guidelines For Soil Erosion and

Sediment Control, 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. The location of the tower site is otherwise incorporated into the existing on-site development of Seven J's Farm in a manner that balances overall environmental effect and other planning goals such as the Town's setbacks for tower facilities.

VIII. Consultations with Local Officials

C.G.S. § 16-50/ (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. Consultation with the Town of Glastonbury by AT&T included discussions regarding adjacent site search areas. MCM and AT&T also explored the potential use of municipal property in Addison Park as part of this specific site search area. Ultimately the property was not made available by the Town Council for consideration as an alternative to Seven J's Farm. The Applicants forwarded a Technical Report to the Town of Glastonbury on June 23, 2014. The Town Council considered the Technical Report and at the request of the Town, MCM and AT&T representatives appeared at the October 14, 2014 Town Council meeting and presented the tower project to the community. No specific preferences or alternatives were identified by the Town of Glastonbury.

IX. Estimated Cost and Schedule

A. Overall Estimated Cost

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

B.

Requisite Component:	Cost (USD)
Tower & Foundation	255,000
Utility Installation	43,000
Facility Installation	57,000
Subtotal MCM Cost	**355,000.00**
Antennas and Equipment	150,000.00
Subtotal AT&T Cost	**150,000.00**
Total Estimated Costs	**505,000.00**

Overall Scheduling

Site preparation work would commence following Siting Council approval of a Development and Management ("D&M") Plan and the issuance of a Building Permit by the Town of Glastonbury. The site preparation phase is generally completed within a four week timeframe. Installation of the tower, compound and utilities is typically an additional two week process. Carrier antennas and

equipment are installed over an approximately additional two week timeframe making the total duration of construction approximately 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 demonstrate that a public need exists for a new tower facility in the northern portion of Glastonbury for reliable service along Candlewood Road, Griswold Street, Addison Road and neighborhoods in the surrounding area. AT&T has gaps in reliable wireless service in and around this area of the state and there are no known facility sites in this part of Glastonbury. Further, the Applicants respectfully submit that the public need for the proposed tower outweighs any potential environmental effects identified to date which are principally limited to visibility of the tower structure in proximity to Seven J's Farm. Accordingly, the Applicants respectfully request that the Siting Council grant a Certificate of Environmental Compatibility and Public Need to MCM for a new wireless telecommunications Facility at the proposed location in Glastonbury.

Respectfully Submitted,

By: 

Christopher B. Fisher, Esq.
Daniel M. Laub, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
(914) 761-1300
Attorneys for the Applicant