

**AMERICAN TOWERS, LLC (ATC)  
AND  
NEW CINGULAR WIRELESS PCS, LLC (AT&T)**

**Amendment to Application to the  
State of Connecticut Siting Council**

**For a Certificate of  
Environmental Compatibility and Public Need**

**–REPLACEMENT FOR DOCKET 67 FACILITY–  
DOCKET 463A**



**AMERICAN TOWERS, LLC (ATC)  
10 PRESIDENTIAL WAY  
WOBURN, MASSACHUSETTS 01801**



**NEW CINGULAR WIRELESS PCS, LLC (AT&T)  
500 ENTERPRISE DRIVE  
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## Table of Contents

### Page

<b>Table of Contents</b> .....	2
<b>I. Introduction</b> .....	5
A. Purpose and Authority.....	5
B. Executive Summary .....	5
C. The Applicants .....	7
D. Application Fee.....	7
E. Compliance with C.G.S. §16-50(c) .....	7
<b>II. Service and Notice Required by C.G.S. § 16-50/ (b)</b> .....	7
<b>III. Statements of Need and Benefits</b> .....	8
<b>IV. Site Selection and Tower Sharing</b> .....	8
A. Site Selection.....	8
B. Tower Sharing .....	8
<b>V. Facility Design</b> .....	9
<b>VI. Environmental Effects</b> .....	10
A. Visual Assessment.....	10
B. CT DEEP, SHPO, THPO, Other State and Federal Agency Comments..	11
C. Power Density.....	12
D. Wetlands, Drainage & Other At Grade Environmental Factors.....	12
E. National Environmental Policy Act Review .....	13
<b>VII. Consistency with the Town of East Lyme’s Land Use Regulations</b> .....	13
A. East Lyme’s Plan of Conservation and Development .....	13
B. East Lyme’s Zoning Regulations and Zoning Classification.....	13
C. Planned and Existing Land Uses.....	18

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D. East Lyme Inland Wetlands and Watercourses Regulations.....18

**VIII. Consultation with Town Officials .....19**

**IX. Estimated Cost and Schedule .....19**

A. Overall Estimated Cost .....19

B. Overall Scheduling.....20

**X. Conclusion.....20**

### List of Attachments

1. Radio Frequency Coverage Maps
2. Site and Facility Description
3. Drawings, Aerial Map, Topographic Map
4. Environmental Assessment Statement
5. Wetland Inspection
6. Power Density Analysis
7. Visibility Analysis
8. CT Department of Energy and Environmental Protection (DEEP) NDDDB Map
9. Text of legal notice published in The Day and affidavit of publication; Notice to Abutting Landowners; List of Abutting Landowners; Certification of Service of Notice.
10. Certification of Service of Application on Federal, State and Municipal Agencies
11. Connecticut Siting Council Application Guide

## 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, American Towers, LLC (“ATC”) and New Cingular Wireless PCS, LLC (“AT&T”) (collectively, the “Applicants”) hereby submit an amendment to the pending application and supporting documentation for a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction, maintenance and operation of a replacement telecommunications tower facility for the facility previously issued a certificate in Docket 67. A proposed replacement facility located at 351A Boston Post Road in the Town of East Lyme (“Boston Post Road Facility”) has been reviewed in Docket 463. This amendment proposes an additional alternative location for review by the Siting Council, one that arose during the course of the hearings and cross-examination in Docket 463. The alternative site is located at 2 Arbor Crossing (with part of the access over property at 4 Arbor Crossing) in the Orchards’ development and would consist of a faux silo tower and barn style equipment shelter (“Alternative Silo Facility”) at a location within a few hundred feet of the exiting monopole tower. Either the Boston Post Road Facility or the Alternative Silo Facility will permit AT&T and other FCC licensed wireless carriers to continue to provide wireless services to thousands of residents, miles of roads and significant portions of East Lyme once the existing facility issued a certificate in Docket 67 is decommissioned.

### B. Executive Summary

AT&T and T-Mobile both provide service to the public from the existing tower site issued a certificate in Siting Council Docket 67 (“Docket 67 Tower”), a tower which is managed for AT&T by American Towers, LLC (“ATC”). Both carriers are pursuing long-term replacement facilities to avoid interruptions in service and provide reliable mobile connectivity in this part of East Lyme. The Alternative Silo Facility at 2 Arbor Crossing (with part of the access over property at 4 Arbor Crossing) would serve in conjunction with other existing facilities in order for AT&T and T-Mobile to largely replace service in this part of the state currently provided by the Docket 67 Tower. As the Council is aware, the underlying property owners elected not to enter into a

long-term lease renewal for the Docket 67 Tower. AT&T has, nevertheless, secured an agreement with the owners and the homeowners association at The Orchards (“The Orchards”) that extends the lease for the Docket 67 Tower to the end of 2017 and permits filing of the Alternative Silo Facility to the Siting Council for review as an alternative to the Boston Post Road Facility.

The record in Docket 463 reflects that AT&T investigated and evaluated well over thirty (30) potential sites and has not identified any other practical, feasible or legally available alternative to the tower as proposed in this Application. Applicants’ Exhibit 1, p. 3; Attachment 2. AT&T’s analysis of communications facilities within a four mile radius of the existing Docket 67 Tower found that these sites would not provide adequate replacement coverage to this particular area of East Lyme, were not available for AT&T siting, or were already being used by AT&T for service (e.g. AT&T sites in Flanders, Niantic, Old Lyme). Applicants’ Exhibit 1, p. 3; Attachment 1. While the Alternative Silo Facility is at a lower ground and antenna elevation than the Docket 67 Tower and will not provide the same coverage footprint, AT&T has coordinated with The Orchards to secure a lease for the Alternative Silo Facility as a potential compromise to objections raised by some related to the proposed Boston Post Road Facility.

Based on the testimony of all parties and intervenors in Docket 463, AT&T understands that the Alternative Silo Facility would be a preferred solution. Docket 463, Tr. pp. 18, 37, and 72-73, January 26, 2016. For AT&T, the solution would be significantly greater capital and operational cost as compared with the Boston Post Road Facility. AT&T submits this amendment to the application in Docket 463 in order to facilitate a Siting Council determination on whether to approve either the Boston Post Road Facility or Alternative Silo Facility as a replacement tower site for the Docket 67 Tower. All prior filings are hereby incorporated by reference. The Applicants’ filing of this Amendment to the Application in Docket 463, as Docket 463A, initiates a new statutory time period for a decision by the Siting Council. AT&T respectfully requests a schedule that includes a public hearing in the Fall and decision by the end of 2016 in order to effectively plan for construction of one of the alternative sites and decommissioning of the existing tower by the end of 2017.

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

7

**C. The Applicants**

The Applicants remain the same as noted in Applicants' Exhibit 1, Application pages 5-6. Please note that the service list contact for AT&T has now changed from Michele Briggs to Jessica Rincon, Sr. Real Estate and Construction Manager at AT&T Mobility, 550 Cochituate Rd. Suite 13 and 14, Framingham, MA 01701. AT&T would be the Certificate Holder for the Alternative Silo Facility should it be approved by the Siting Council.

**D. Application Fee**

A check made payable to the Siting Council in the amount of \$1,250 accompanied the original Application. Included in this Amendment to the Application and its accompanying attachments are reports, plans and visual materials detailing the design and location for the proposed Alternative Silo 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 Amended Application is also included in Attachment 11.

**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 Amended 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 Amended Application is included in Attachment 10. Pursuant to C.G.S. § 16-50/ (b), notice of the Applicant's intent to submit this amended application was published on two occasions in The Day. The text of the published legal notice is included in Attachment 9. The original affidavits of publication will be provided to the Siting Council once received from the publisher. Furthermore, in compliance with C.G.S. § 16-50/ (b), notices were sent to each person or entity appearing of record as the

### III. Statements of Need and Benefits

8

owner of a property which abuts the premises on which the Alternative Silo 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 9. Copies of this Amended Application are also being served on all parties and intervenors in Docket 463.

### III. Statements of Need and Benefits

The Applicants incorporate by reference the Statements of Need and Benefits included in the original Application. Applicants' Ex. 1 pp. 7-14. Of note, the proposed Alternative Silo Tower is just +/- 240' from the existing and approved Docket 67 Facility for which a public need was previously established.

### IV. Site Selection and Tower Sharing

#### A. Site Selection

As noted in the original application, the site search focused on replacing the Docket 67 Facility from which AT&T currently provides reliable wireless services in this area of East Lyme. As detailed in the site search information provided in the original Application (Applicants' Ex. 1, Attachment 2) numerous sites were legally unavailable for tower siting, technically inadequate to satisfy coverage requirements in this part of the state, unavailable as a result of THPO determinations and federal laws or otherwise determined by the Applicants to have comparatively greater overall environmental effects than the Facility as proposed. At this point in time, the Applicants only have legal control over the Alternative Silo Facility and the Boston Post Road Facility. The Applicants do not legally control any other potential alternative for presentation to the Siting Council.

#### B. Tower Sharing

The proposed Alternative Silo Facility, as well as the Boston Post Road Facility, will accommodate the antennas and equipment of four wireless carriers. The tower elevations identify AT&T and T-Mobile as the initial carriers planning to relocate from the existing Docket 67 Tower.



## V. Facility Design

The proposed Alternative Silo Facility is on an approximately 5.22 acre parcel with an address of 2 Arbor Crossing ("Parcel"). The Parcel is owned by Orchards at East Lyme Inc. and is improved with a clubhouse, sport courts, pool and pool house as well as the Docket 67 Tower. The remainder of the Parcel is undeveloped. A portion of the access driveway would be developed over an adjacent lot at 4 Arbor Crossing in separate ownership is an undeveloped residential lot. Future development on the lot at 4 Arbor Crossing would include a shared driveway for both the residence and the Alternative Silo Facility.

The proposed telecommunications facility includes an approximately 10,000 s.f lease area on the Parcel. The tower is proposed as a new 105' AGL faux silo. AT&T would install up to twelve (12) panel antennas and related equipment at a centerline height of 95' above grade level (AGL) on the tower. The tower is designed for shared use of the structure by T-Mobile and additional FCC licensed wireless carriers. A 35' x 50' equipment shelter designed as a barn would be installed at the tower base, and which would house carrier equipment and a backup generator.

Vehicle access to the facility would be from Arbor Crossing over portions of 2 Arbor Crossing and 4 Arbor Crossing. The driveway would include a paved apron and gravel access drive a total distance of approximately 375' to the silo and barn structures. Utility connections would be routed underground from existing utilities on-site. The existing Docket 67 Facility will be removed upon construction of either the Alternative Silo Facility or Boston Post Road Facility.

Attachment 3 contains the specifications for the proposed Alternative Silo Facility, including an abutters map, site plan, compound plan and elevation plan, and other relevant details of the proposed Silo Facility. Included as Attachments 4 through 8 are various documents including a Visibility Analysis (Attachment 7). Some of the relevant information identifies that:

- The total area of disturbance is low with some grading and installation of rip-rap proposed to match conditions adjacent to the nearby existing pool and no trees will be removed.

- The proposed Alternative Silo Facility will have little to no impact on water flow or water quality and no direct impacts to any wetlands or watercourses are anticipated, the nearest wetland being off-site approximately 1,330' away.
- The proposed Alternative Silo Facility is on the same lot and just downhill from the existing Docket 67 Tower.
- The viewshed and views are reduced as compared to the existing Docket 67 Facility and the silo enclosure and barn style equipment building will serve to mitigate any near field views. Most views of the proposed Silo Facility are limited to upper portions of the silo and in areas over 0.75 miles away.
- The proposed Boston Post Road Facility alternative is +/- 2,300 feet from the Alternative Silo Facility location.

## VI. Environmental Effects

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 a 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 the Amended Application, the Alternative Silo Facility will be constructed in compliance with applicable regulations and guidelines, and best practices will be followed to ensure that construction of the proposed Facility will minimize any significant adverse environmental impact to the extent practicable.

### A. Visual Assessment

The principal environmental effect associated with the Alternative Silo Facility is its visibility from the south and east including localized views from residential properties. Included in Attachment 7 is a Visibility Assessment containing a view shed map and photo simulations of off-site views where the tower will be visible. Topography, vegetation and the relative height of the Alternative Silo Facility will obscure views of the silo tower from many locations in the study compared to the Docket 67 Facility with the greatest visibility occurring in the immediate area. No schools or licensed day care centers are located within 250' of the site. Should the Siting Council deem necessary and weather permitting, the Applicants will raise a balloon with a diameter

of at least three (3) feet at the proposed site on at a time specified by the Siting Council. Overall, the proposed Alternative Silo Facility will have a smaller view shed in comparison to the existing Docket 67 Tower.

B. CT DEEP, SHPO, THPO, Other State and Federal Agency Comments

Various consultations and analyses for potential environmental impacts are summarized and included in Attachments 4 - 8. An evaluation of species and habitat of special concern including consultation with the United States Fish and Wildlife Service (USFWS), the Connecticut Department of Energy and Environmental Protection (CTDEEP) and the Connecticut State Historic Preservation Officer (SHPO) are pending. As the Council will recall, representatives of the Applicants submitted reports and requests for review to these federal and state entities for the Boston Post Road Facility revealing that two federally-listed Threatened Species may occur in the vicinity of Boston Post Road Facility: northern long-eared bat (*Myotis septentrionalis*; also a state Endangered Species) and small whorled pogonia (*Isotria medeoloides*; also a state Endangered Species). CTDEEP Natural Diversity Data Base map indicates that the Alternative Silo Facility is outside the areas of concern. CTDEEP previously identified the presence of the red bat (*Lasiurus borealis*) in the area and had recommended that tree-clearing activities for construction not occur from May 1 to August 15th when red bats are active and known to occur in the area. Applicants' Ex. 1, Attachment 9. Construction of the Alternative Silo Facility requires no tree removal and as such this recommendation is not applicable for this alternative. Other potential impacts to avian resources are unlikely given the long time presence of the existing Docket 67 Tower immediately up the hill from the proposed Alternative Silo Facility which is lower in height and elevation.

AT&T's consultants are reviewing any potential adverse effect upon historic or cultural resources. The Applicants have not identified any potential for significant adverse effects on federal, state and local resources administered by these agencies given the existing tower, disturbed site location and residential development in the area. A review request, consistent with the requirements of Section 106 of the National Historic Preservation Act of 1966, is being submitted to the SHPO. Similarly, THPO review has been sought for any potential adverse effect on tribal resources in this area of East Lyme. 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. The tower site will fully comply with federal and state MPE standards. The cumulative worst-case calculation of power density from operations would be 15.43% of the MPE standard (assuming T-Mobile also moves over to the new facility). A power density report is included in Attachment 6.

D. Wetlands, Drainage & Other At Grade Environmental Factors

The Alternative Silo Facility site is located on a parcel of property developed with existing recreational facilities and the Docket 67 Facility. The lease area and proposed areas of disturbance are located central to the Parcel with most occurring north of the existing pool. The closest wetland to the proposed tower facility is approximately +/-1,330' away. There are no on-site wetlands and no direct impacts to any wetlands or watercourses are anticipated as a result of the tower site construction. A wetland analysis is included in Attachment 5. Storm water will be managed and incorporated into existing systems in The Orchards development. Overall, the construction and operation of the proposed Alternative Silo Facility will not have an impact on wetlands or water quality and drainage will be appropriately managed.

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 it 24 hours a day, seven days a week from a remote location. The proposed silo and barn do 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 or generators installed by the carriers. During power outages and weekly equipment cycling an emergency generator would be utilized with air emissions in compliance with State of Connecticut requirements.

**VII. Consistency with the Town of East Lyme's Land Use Regulations**

13

**E. National Environmental Policy Act Review**

AT&T is evaluating the Alternative Silo Facility 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 Parcel 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 will be impacted. The Alternative Silo Facility is expected to be categorically exempt from the need for any further FCC environmental review.

**VII. Consistency with the Town of East Lyme's Land Use Regulations**

Pursuant to the Siting Council's Application Guide, a narrative summary of the consistency of the project with the Town'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. Copies of the Town of East Lyme Zoning Code, Inland Wetlands Regulations, Zoning Map and Plan of Conservation and Development were previously included in the Bulk Filing for this Docket. Applicants' Ex. 1, Bulk File Exhibits a through and including d ("Bulk Filing").

**A. East Lyme's Plan of Conservation and Development**

The East Lyme Plan of Conservation & Development ("POCD") is included in the Bulk Filing. The Town's POCD does not specifically address wireless service and infrastructure. The existing Docket 67 Tower has been operational for nearly 30 years, and part of any context for the Town's POCD related to wireless facilities.

**B. East Lyme's Zoning Regulations and Zoning Classification**

The Town of East Lyme Zoning Regulations set forth requirements for telecommunications facilities under Section 31, which permit tower structures in all zoning districts subject to the approval of a Special Permit and Site Plan. The proposed tower Facility site is classified in the RU-40 (1 acre residential) zoning district where wireless communications facilities are a specially permitted use. A

## VII. Consistency with the Town of East Lyme's Land Use Regulations

14

summary of the Town's Zoning Regulations and how the proposed facility meets these standards is incorporated in the Table below.

Section from the Zoning Regulations	Standard or Preference	Proposed Facility
31.2.1 General Standards	Preference for use of existing tower sites.  Commitment to permit future co-location on new tower sites.	The Alternative Silo Facility is on the same Parcel as the Docket 67 Facility with reduced viewshed and mitigating aesthetic design. Carrier collocation is planned for.
31.2.2	Collocation Process.	N/A - Future collocations will likely be exempt modifications.
31.2.3	Minimum Lot Size - Underlying Zoning District.	The site is in a RU-40 one-acre zoning district. The underlying lot is 5.22 acres in size.
31.2.4	Tower Height - Minimum height necessary to satisfy technical requirements.	The tower at 105' AGL is as high as can be achieved at this location based on property owner requirements. A taller tower could be justified relative to the existing coverage footprint from the existing tower site.
31.2.5	1x Tower Height Setback.	The proposed tower is 105' in height and set back 90' from the nearest property line. The site is surrounded by subdivided but as-yet undeveloped parcels. The tower site location was selected in consultation with the developer and homeowners

## VII. Consistency with the Town of East Lyme's Land Use Regulations

15

		association to minimize impact to potential future development and likely location of future off-site structures.
31.2.6	Tower color shall blend with surroundings.	The tower is proposed as a matte gray silo in a wooded area inspired by the area's former agricultural use.
31.2.7	Tower compound landscaping shall be required.	The proposed facility is set back behind existing recreational facilities, incorporates mitigation by way of silo and barn enclosures, a cedar fence, and landscaping. No additional clearing or landscaping than necessary for the tower compound and driveway is proposed.
31.2.8	No tower lighting is permitted unless required by the FAA.	The 105' tower height requires no FAA-mandated lighting.
31.2.9	No advertising or signage other than any required compliance signage is permitted.	The proposed Facility will incorporate compliance and other identification signs on the building entrance. No advertising is proposed.
31.2.10	Any unused tower shall be removed within 12 months and secured.	The Certificate holder will comply with the Council's standard conditions of approval and as publicly traded companies, no further security is warranted to support potential

## VII. Consistency with the Town of East Lyme's Land Use Regulations

16

		removal.
31.2.11	Interference avoidance.	The FCC licensed frequencies used by AT&T and other carriers are separate and apart from others used for public safety, TV, radio or other services. Interference is regulated by the FCC.
31.2.12	Permit exemption for satellite dishes under 3' in diameter when ground mounted.	N/A
31.2.13	Driveway standards: a) 60,000 lb. vehicles b) Grade not to exceed 8% and c) Minimum vertical clearance of 12'	A paved apron and standard gravel compacted access drive is proposed to the tower site location.
31.3 Siting Preferences	Preferential hierarchy: -existing approved towers -existing structures -tower farms -new towers in commercial zones -on non residential structures in residential zones -on residential structures in residential zones	The proposed Alternative Silo Facility is equivalent to replacement of an existing tower on a parcel at another location on the same parcel with a tower of a lesser height. There are no other towers, structures, or commercial zones in which to site a replacement facility.
31.4.1 Location Standards	Applications involving a second tower at an existing tower site.	While this is a "second tower" the original Docket 67 Facility will be removed.



## VII. Consistency with the Town of East Lyme's Land Use Regulations

17

31.4.2	Applications involving towers in commercial zones.	N/A
31.4.3	Applications involving towers in residential zones: all attempts shall be made to collocate on towers, buildings, or structures outside of residential areas with proof from a RF engineer and other evidence. Equipment structures shall meet applicable zoning regulations.	The original application (Applicants' Ex. 1) includes information on the existing coverage from the existing tower along with a site search and RF justification. The at grade equipment structures comply with the RU-40 requirement of 30 feet from the nearest property line. <sup>1</sup>
31.5.1 - 31.5.3 Placement Standards	Roof mounted facilities, existing structure facilities, residential structure mounts	N/A
31.6.1 Accessory Facilities	In residential zones, the accessory building shall be as small as possible and shall have a roofline characteristic of other	The equipment shelter to be used by AT&T and other carriers here is as small as practical, has a sloped barn style roof.

<sup>1</sup> The Zoning Map of East Lyme designated the Silo Facility/Docket 67 Facility parcel as "RU-40/20" which allows for a special application of zoning standards for areas within the former R-20 District. In this case, a building or structure shall not be less than 40 feet from any street line or 20 feet from any property line. Town of East Lyme Zoning Code Section 5.3.3 provides that:

No building or structure shall be placed on a lot less than 50 feet from the street line or 30 feet from any other property line except that in the case of an individual lot which was set off under an officially approved subdivision in the former R-20 District, no building or structure shall be placed less than 40 feet from any street line or 20 feet from any other property line. Included within the scope of this exception is any lot of record which was legally established prior to November 1, 1973, and which falls within the boundaries of an area bearing the dual designation of "RU-40" and "R-20" on the official Zoning Map of East Lyme.

	buildings in the vicinity and there shall be only 1 per facility.	
31.6.2	Buildings shall meet underlying setback requirements for the zone.	The proposed barn is setback more than 50' from adjacent property lines and meets the RU-40 minimum building setback of 30'.
31.6.3	Rooftop equipment	N/A
31.6.4	At grade fencing shall be at least 6' in height of materials appropriate for the zone with landscaping.	The tower compound incorporates a 4' farm-style cedar fence in keeping with aesthetics of the facility. All equipment will be secured within the barn-style equipment building obviating the need for security fencing.

#### C. Planned and Existing Land Uses

The Facility is proposed on a 5.21 acre parcel of land owned by Orchards at East Lyme, Inc. which is improved with a recreational/clubhouse building, pool, sport courts and the existing Docket 67 Facility. The surrounding area within ¼ mile consists largely of single-family residential properties many of which are not yet developed. The Orchards is a single-family housing development undergoing construction of subsequent phases of housing.

#### D. East Lyme Inland Wetlands and Watercourses Regulations

The East Lyme Inland Wetlands Regulations ("Local Wetlands Regulations") regulate certain activities conducted in "Wetlands" and "Watercourses" as defined therein. The Town established upland review areas for wetlands and watercourses are not implicated in this Application. As set forth in the Wetland Investigation Report in

Attachment 5, the proposed facility is located approximately 1,330' from the nearest wetland. No direct impacts to any wetlands or watercourses are anticipated as a result of the tower site construction.

Additionally, the overall impervious surface associated with the Facility is low and any resultant storm water will be managed with Best Management Practices to be implemented during construction in accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Connecticut Council of Soil and Water Conservation and DEEP (2002). Soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility. The Applicants do not anticipate an adverse impact on any wetland or water resources as part of construction or longer term operation of the Alternative Silo Facility.

#### **VIII. Consultation with Town Officials**

The proposed Alternative Silo Facility is a direct outgrowth of the Docket 463 proceeding in which the Town of Lyme is a Party. Town of East Lyme Ex. 1 (Request for Part Status dated November 19, 2015). A Technical Consultation was commenced on June 5, 2015 upon the filing of the Technical report for the Boston Post Road Facility. Through consultations with municipal officials AT&T understood the Town's general preference would be to simply maintain the existing Docket 67 Tower where it is today. It was confirmed in hearings for Docket 463 that the Town would be supportive of the Applicants working with the property owner to modify the design and aesthetics of the facility at 2 Arbor Crossing given "it's an existing tower." Docket 463, Goeschel, Tr. pp. 18. No further technical consultation is legally required to amend the Application and present the Alternative Silo Facility for Siting Council consideration and the Town as a party will have an opportunity to comment on same as part of Docket 463A.

#### **IX. Estimated Cost and Schedule**

##### **A. Overall Estimated Cost**

The total estimated cost of construction for the proposed Alternative Silo Facility is represented in the table below:

<b>Requisite Component:</b>	<b>Cost (USD)</b>
Tower & Foundation	550000
Site Development	105,000
Utility Installation	85,000
Antennas and Equipment	250,000
<b>Total Estimated Costs</b>	<b>995,000</b>

B. Overall Scheduling

Site preparation work would commence following Siting Council approval of a Development and Management ("D&M") Plan for either the Boston Post Road Facility of the Alternative Silo Facility and the issuance of a Building Permit by the Town of East Lyme. The site preparation phase is expected to be completed in 6 weeks. Installation of the monopole or silo enclosure, antennas and associated equipment compound or barn is expected to take an additional 2 months. The duration of the total construction schedule is approximately 3-4 months. Facility integration and system testing for carrier equipment is expected to require an additional 2 weeks after construction is completed. Additionally, as part of the issuance of any Certificate in Docket 463A, ATC and AT&T would undertake decommissioning of the existing Docket 67 Tower.

X. **Conclusion**

The Application and this Amendment and the accompanying materials clearly demonstrate that a public need exists for a new replacement tower in East Lyme so AT&T and T-Mobile may continue to provide reliable wireless services to the public. The Applicants respectfully submit that the public need for either of the proposed replacement tower facilities outweighs any potential environmental effects from development of the Boston Post Road Facility or the Alternative Silo Facility. Impacts are principally limited to relative changes in tower visibility associated with the current Docket 67 Tower in this area of East Lyme. The Applicants respectfully request that the Siting Council grant a Certificate of Environmental Compatibility and Public Need to

ATC and/or AT&T and approve either of the proposed alternatives as a replacement wireless telecommunications facility in East Lyme.

Respectfully Submitted,

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