Connecticut Siting Council

APPLICATION OF HOMELAND TOWERS, LLC
AND
CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS

515 MOREHOUSE ROAD
EASTON, CONNECTICUT

DOCKET NO. _____

APRIL 21, 2017

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EXECUTIVE SUMMARY

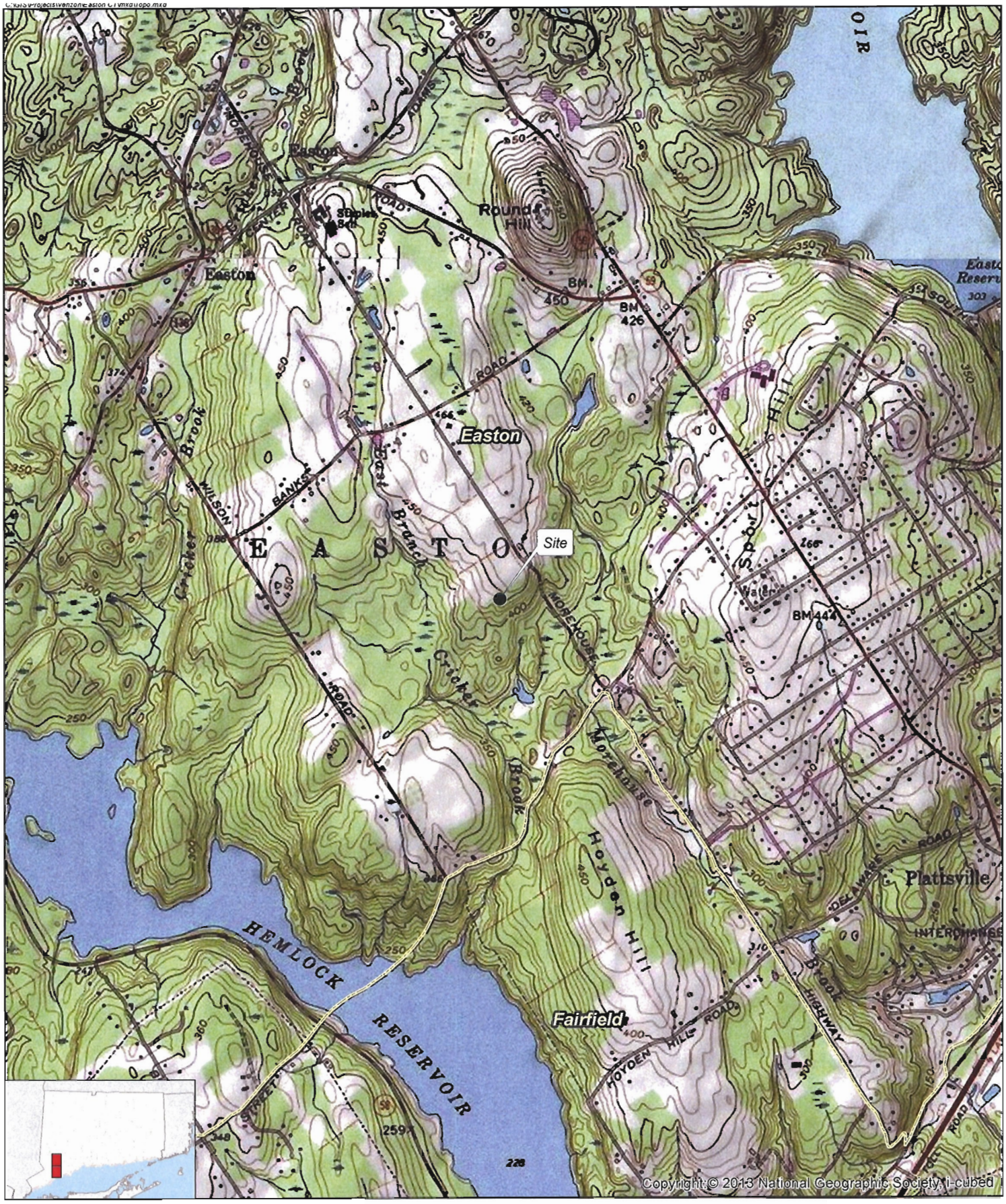
Homeland Towers, LLC ("Homeland"), in cooperation with Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), proposes to construct a telecommunications tower and related facility (the "Easton Facility") in the southerly portion on an approximately 104.41-acre parcel at 515 Morehouse Road in Easton, Connecticut (the "Property"). The Property is owned by the Town of Easton ("Town"). The northerly portion of the Property is occupied by the Staples Elementary School and related athletic fields. The southerly portion of the Property is undeveloped and used, in part, for material storage by the Town's Public Works Department.

The Easton Facility would provide improved wireless service to existing gaps along portions of Routes 58, 59 and 136, as well as local roads in the area. The Easton Facility will also provide some capacity relief to Cellco's existing Fairfield (Alpha sector) and Plattsville (Gamma sector) facilities which are currently operating at or near their respective capacity limits.

Homeland plans to construct a 150-foot "monopine" tree tower within a 70' x 70' facility compounded (70' x 80' leased area) in the southern portion of the Property. Faux branches would extend to an overall height of 157 feet. Cellco would install twelve (12) panel-type antennas and nine (9) remote radio heads at a height of 145 feet above ground level ("AGL"). The Town will install municipal and emergency service antennas on the tower at the 150-foot, 95-foot and 75-foot levels.

Equipment associated with Cellco's and the Town's antennas will be installed near the base of the tower. Cellco will install two equipment cabinets, a battery cabinet and a diesel-fueled back-up generator on a 9'-4" x 16' steel platform on concrete piers with a steel canopy in

the southwest corner of the facility compound. Vehicular access to the tower compound would extend from Morehouse Road over an existing bituminous/gravel driveway used by the Public Works Department a distance of 1,650 feet, then over a new gravel driveway extension a distance of approximately 315 feet to the facility compound. Utilities would extend from existing service along Morehouse Road through a proposed utility easement in the southerly portion of the Property.



Legend

- Site
- Municipal Boundary

-iii-

1,000 500 0 1,000 Feet

Site Topographic Map

Proposed Verizon Wireless
Antenna Collocation Facility
Easton CT
515 Morehouse Road
Easton, Connecticut

verizon

ALL-POINTS TECHNOLOGY CORPORATION

Map Notes:
Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Botsford (1984) and Westport (1971), CT
Site is located on the Westport Quadrangle
Map Date: March 2017

Legend

- Proposed Monopine Tower
- Approximate Facility Layout
- Proposed Access Along Existing Access Drive
- Proposed Underground Utility Route
- Approximate Host Property

N
W E
S

400 200 0 400
Feet

Aerial Photograph

Proposed Verizon Wireless
Antenna Collocation Facility
Easton CT
515 Morehouse Road
Easton, Connecticut

verizon

Map Notes:
Base Map Source: 2012 Aerial Photograph (CT ECO)
Map Scale:1 inch = 400 feet
Map Date: March 2017

ALL-POINTS TECHNOLOGY CORPORATION

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF HOMELAND TOWERS, LLC AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 515 MOREHOUSE ROAD, EASTON, CONNECTICUT	:	**DOCKET NO. ____**
	:	**APRIL 21, 2017**

APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (the "Application") is submitted by Homeland Towers, LLC ("Homeland") in cooperation with Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes ("C.G.S."), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies ("R.C.S.A."), as amended. The Application requests that the Connecticut Siting Council ("Council") issue a Certificate of Environmental Compatibility and Public Need ("Certificate") for the construction, maintenance, and operation of a wireless telecommunications facility on an approximately 104.41-acre parcel at 515 Morehouse Road in Easton, Connecticut (the "Property"). This site is identified throughout the Application as Cellco's "Easton Facility". If approved, the Council Certificate would be issued

to and held by Homeland.

The northerly portion of the Property is occupied by the Staples Elementary School, athletic fields and parking areas. The southeast portion of the Property is undeveloped and used, in part, as a materials storage area by the Town's Public Works Department. The proposed Easton Facility would be located in the southwesterly portion of the Property. At this location, Homeland would construct a 150-foot self-supporting "monopine" telecommunications tower within a 70' x 70' facility compounded 70' x 80' leased area. Faux branches would extend above the top of the tower to an overall height of 157 feet. Cellco would install twelve (12) panel-type antennas and nine (9) remote radio heads ("RRHs") at the 145-foot level on the tower. The Town will install emergency and municipal service antennas at the top of the tower, at the 75-foot level and at the 95-foot level on the tower. Equipment associated with Cellco's antennas, a battery cabinet and a diesel-fueled generator would be installed on a 9'-4" x 16' steel platform and canopy located in the southwest portion of the fenced facility compound. Vehicular access to the Easton Facility would extend from Morehouse Road over an existing bituminous/gravel driveway on the Property a distance of 1650 feet; then over a new gravel driveway extension, an additional distance of approximately 315 feet to the cell site. Utilities will extend from existing service along Morehouse Road through a new utility easement directly from Morehouse Road.

Included in this Application, as Attachment 1, is a factual summary and project plans for the proposed Easton Facility. This information, along with the other attachments submitted as part of this Application, contain all of the site-specific information required by statute and the regulations of the Council.

B. The Applicant

Homeland Towers, LLC is a New York limited liability company with an office located at 9 Harmony Street in Danbury, Connecticut 06810. Homeland has developed numerous telecommunications facilities in Connecticut and New York. Homeland will construct, own and maintain the proposed Easton Facility tower and, if approved by the Council, would be the Certificate holder.

Cellco is a Delaware Partnership with an administrative office located at 99 East River Drive, East Hartford, CT, 06108. Cellco is licensed by the Federal Communications Commission ("FCC") to operate a wireless telecommunications system in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public. Operation of the wireless telecommunications systems and related activities are Cellco's sole business in the State of Connecticut.

Correspondence and/or communications regarding this Application may be addressed to:

Homeland Towers, LLC
9 Harmony Street, 2nd Floor
Danbury, CT 06810
Attention: Raymond Vergati

Cellco Partnership d/b/a Verizon Wireless
99 East River Drive
East Hartford, CT 06108
Attention: Anthony Befera

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(860) 275-8200
Attention: Kenneth C. Baldwin, Esq.

C. Application Fee

The estimated total construction cost for the Easton Facility would be less than $5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations of Connecticut State Agencies, an application fee of $1,250 accompanies this Application in the form of a check payable to the Council.

II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50*l*(b)

Copies of this Application have been sent to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50*l*(b). A certificate of service, along with a list of the officials served with a copy of the Application, is included as Attachment 2.

Notice of Cellco's intent to submit this Application was published on April 18 and April 19, 2017, by Cellco in the *Connecticut Post* pursuant to C.G.S. Section 16-50*l*(b). A copy of the published legal notice is included as Attachment 3. An Affidavit of Publication from the *Connecticut Post* will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Homeland's intent to file this application was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50*l*(b), as well as a list of the landowners to whom such notice was sent and a sample notice letter.

III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES INFORMATION

The purpose of this section is to provide an overview and general description of the proposed Easton Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the "Act"). (Pub. L. No. 104-104, 110 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation in all aspects of the telecommunications industry, including facility siting, in order to foster lower prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by state and municipal authorities, including the Council, with respect to public need for the service to be provided by the facility described in this application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, in order to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirement in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless

system throughout Connecticut. This system, together with Cellco's system throughout its New England and nationwide markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States, Congress also enacted the Wireless Communications and Public Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004, Congress enacted the Enhanced 911 Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued President Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy[1] to ensure that all Americans would have access to broadband capability, whether wired or wireless; to establish the United States as a leader in wireless service innovation; and to establish, in America, the fastest and most extensive wireless network.

In an effort to encourage a more timely review and approval of wireless facility siting applications, the FCC, in 2011, established specific time limits for local and State land use

[1] Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

decisions on wireless facilities.[2] In 2012, Congress passed the Middle Class Tax Relief and Job Creation Act which included a provision, Section 6409, which mandates the approval of certain eligible wireless facility modifications. The provisions of Section 6409 were further clarified in the FCC's October 17, 2014 Report and Order (FCC No. 14-153) and were specifically designed to accelerate broadband deployment by improving the efficiencies of the wireless facility siting process.

Included as Attachment 5 is a copy of Cellco's FCC licenses for its wireless service in Fairfield County, Connecticut. The FCC's rules permit a licensee to modify its system, including the addition of new cell sites, without prior approval by the FCC, as long as, by doing so, the licensee's authorized service area is not enlarged. The addition of the Easton Facility would not enlarge Cellco's authorized service area in Fairfield County.

B. Public Need and System Design

1. Need for the Easton Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Fairfield County, Cellco holds an FCC License to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. Pursuant to its FCC Licenses, Cellco has developed and continues to develop a network of cell sites to serve the demand for enhanced wireless services throughout the nation and more specifically, the State of Connecticut.

Cellco currently provides wireless service in Easton and the adjacent Towns of Trumbull, Fairfield, Weston and Redding. Plots showing the extent of reliable wireless service in the area

[2] FCC Declaratory Ruling WT Docket No. 08-165.

reveals significant "gaps" in wireless service in each of Cellco's operating frequencies. All or significant portions of these gaps will be filled by service from the proposed Easton Facility. (*See* Attachment 6). The proposed Easton Facility will also provide some capacity relief to Cellco's existing Fairfield (Alpha sector) and Plattsville (Gamma sector) facilities which are all currently operating at or beyond their respective capacity limits (a/k/a exhausting).

2. Cell Site Information

Homeland intends to construct a 150-foot self-supporting "monopine" tree tower within a 70' x 70' fenced compound in the southerly portion of the Property. Faux branches would extend above the top of the tower to an overall height of 157 feet. Cellco would install a total of twelve (12) panel type antennas and nine (9) RRHs at the 145-foot level. The Town will install municipal and emergency service antennas at the 150-foot, 95-foot and 75-foot levels. Equipment associated with Cellco's and the Town's antennas will be located near the base of the tower within a fenced compound. Cellco will install two (2) equipment cabinets, a battery cabinet and a 20 kW diesel-fueled generator on a 9'-4" by 16' steel platform and canopy in the southwest portion of the compound. Cellco's equipment cabinets would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The battery system will provide back-up power when commercial power to the facility is interrupted. The 20 kW generator would be used to recharge the battery system. The equipment would remain unstaffed, except as required for maintenance. Once the site is operational, maintenance personnel will visit the cell site on a monthly basis. More frequent visits may be required if there are problems with the antennas or associated equipment. The proposed Easton Facility will provide reliable wireless service to a 2.9 mile portion of Route 58, a 1.9 mile portion of Route 59, a 3.1 mile

portion of Route 136, and an overall area of 18.97 square miles at 700 MHz frequencies; a 2.8 mile portion of Route 58, a 1.7 mile portion of Route 59, a 2.9 mile portion of Route 136, and an overall area of 17.88 square miles at 850 MHz frequencies; a 1.1 mile portion of Route 58, a 1.4 mile portion of Route 59, a 0.4 mile portion of Route 136, and an overall area of 3.35 square miles at 1900 MHz frequencies; and a 0.9 mile portion of Route 58, a 1.2 mile portion of Route 55, a 0.4 mile portion of Route 136, and an overall area of 3.21 square miles at 2100 MHz frequencies.

The proposed Easton Facility will interact with five (5) of Cellco's existing telecommunications facilities all located within approximately four (4) miles of the Property

- Cellco's existing Trumbull Center cell site consists of antennas on a water tank off Merrimac Drive in Trumbull and is located approximately 2.4 miles northeast of the proposed Easton Facility.
- Cellco's existing Plattsville cell site consists of antennas on the roof of a building at 175 Jefferson Street in Fairfield and is located approximately 2.3 miles southeast of the proposed Easton Facility.
- Cellco's existing Fairfield cell site consists of antennas on a tower at 281 Woodhouse Avenue in Fairfield and is located approximately 2.5 miles south of the proposed Easton Facility.
- Cellco's existing Weston North cell site consists of antennas on a tower at 237 Godfrey Road in Weston and is located approximately 4.0 miles northwest of the proposed Easton Facility.

- Cellco's existing Easton North 2 cell site consists of antennas on a tower at 206 Everett Road in Easton and is located approximately 3.8 miles north of the proposed Easton Facility.

Plots showing coverage from these existing Cellco facilities in the area, alone and together with coverage from the proposed Easton Facility, are included as Attachment 6.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Easton Facility, in particular, have been designed and developed to allow Cellco to achieve and to maintain high quality, reliable wireless service. The system design is capable of orderly expansion and is compatible with other wireless systems. The resulting quality of service compares favorably with the quality of service provided by conventional wireline telephone service. The wireless system is designed to assure a true cellular configuration of base transmitters and receivers in order to cover the proposed service area effectively while providing the highest quality of service possible.

Cellco's mobile telephone switching offices ("MTSOs") in Windsor and Wallingford are interconnected and operate Cellco's wireless systems in Connecticut as a single network, offering the subscriber uninterrupted use of the system while traveling throughout the State. This network is further interconnected with fiber optic networks, local exchange company and long distance carrier networks. Cellco has designed its wireless system to conform with applicable standards and constraints for wireless systems and to minimize the need for additional cell sites in the absence of additional demand or unforeseen circumstances.

b. Cellular System Equipment

The key elements of the cellular system are Cellco's two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller equipment. This equipment is capable of expanding in modules to meet system growth needs. The cell site equipment primarily provides for message control on the calling channels; call set-up and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test demand; data from the wireless units in both directions and on all channels; scan receiver control; transmission of power control commands rescanning of all timing and commands and voice channel assignment.

In addition to the platform-mounted radio equipment, Cellco intends to install twelve (12) panel-type transmit/receive antennas (three (3) model SBNHH-1D65B, 700 MHz antennas; three (3) model SBNHH-1D65B, 850 MHz antennas; three (3) model SBNHH-1D65B, 1900 MHz antennas; and three (3) model SBNHH-1D65B, 2100 MHz antennas. Cellco will also install a total of nine (9) remote radio heads behind its 700 MHz, 1900 MHz and 2100 MHz antennas, two (2) HYBRIFLEX™ fiber optic antenna cables and one (1) GPS antenna. Back-up power to the Easton Facility will be provided by an onsite battery system and a 20 kW diesel-fueled generator. The generator is used exclusively to recharge the back-up battery system. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

4. Technological Alternatives

Pursuant to its FCC licenses, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no equally effective

technological alternatives that would allow Cellco to provide its wireless service to the area than those described in this Application. In fact, Cellco's wireless system represents state-of-the-art technology offering high-quality wireless service. Cellco is aware of no viable and currently available alternatives to its system design for carriers licensed by the FCC.

C. Site Selection and Tower Sharing

1. Cell Site Selection

The goal in selecting cell sites, like the one described above, is to locate a facility in such a manner as to allow a wireless carrier to build and to operate a high-quality wireless system with the least environmental impact. Homeland, in cooperation with Cellco and the Town has determined that the proposed Easton Facility location satisfies this goal and will help resolve Cellco's wireless service problems and the Town's municipal and emergency service problems in southern and central portions of the Town.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area or ring established by Cellco's Radio Frequency Engineers and network designers. In any search area, a wireless carrier first examines the availability and use of existing towers or other sufficiently tall structures that might help satisfy its wireless service objectives. Cellco currently maintains five (5) macro-cell wireless telecommunications facilities within approximately four (4) miles of the proposed Easton Facility location. Each of these existing facilities will, to some extent, interact with the proposed Easton Facility and are identified on the coverage maps included in Attachment 6. The use of existing, non-tower structures in an area, when available are also suggested as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the designated Easton

search area. Homeland initiated its site search process for the Easton Facility in February of 2012 and identified two Town properties (515 Morehouse Road and 244 Beers Road) as possible candidates for a cell site. The Town did not wish to pursue a lease for a tower site at 244 Beers Road. Cellco determined that an antenna centerline height of 145 feet at the Property would satisfy its wireless service objectives in the area. Homeland negotiated and ultimately entered into an Option and Ground Lease with the Town for the use of the Property. The Site Search Summary (Attachment 8) together with the site information contained in Attachments 1 and 6 support the Applicant's position that the site selected represents the most feasible alternative of the sites investigated.

2. Tower Sharing

Homeland will design the proposed tree tower and compound to be shared by a minimum of four (4) wireless carriers, and municipal and emergency service providers. This type of tower sharing arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future.

3. Overall Costs and Benefits

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless services throughout significant portions of Easton. The Easton Facility would be a part of a communications system that addresses the public need identified by the FCC and the United States Congress for high-quality, competitive wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in

the future. The overall costs to the Applicant for development of the proposed cell site are set forth in Section III.D. of the Application.

4. Environmental Compatibility

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the Council is required to find and to determine, among other things, the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflicting with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

a. Primary Facility Impact is Visual

The wireless system of which the proposed Easton Facility would be a part has been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a "sight line" toward the tower. Similarly, visual impact of a tower facility can be further reduced through the proper use of alternative tower structures; so-called "stealth or disguised installations." Where appropriate, telecommunications towers camouflaged as trees, for example, could help to further reduce visual impacts associated with these structures.[3] A Visibility Analysis prepared by All-Points Technology Corporation ("APT") for the Easton Facility is

[3] Minimizing the overall visual impact of the proposed tower was, in fact, a goal of the Town when it selected a "tree tower" for development at the Property.

included in Attachment 9. The Visibility Analysis assesses the visual impact of the proposed 157-foot "monopine" tower on the surrounding areas and includes photographic simulations for the Council's review and consideration.

According to the Visibility Analysis, areas where the top portion of the tree tower would be visible above the tree canopy comprise approximately 106 acres or 1.3% of the 8,042 acre study area. Year-round visibility of the Easton Facility tower is generally limited to locations to the north and east along Morehouse Road, all along approximately 0.6 miles of the proposed tower site. When the leaves are off the trees, seasonal views, through intervening trees and branches are anticipated to occur in some locations within an area of approximately 281 additional acres (4.8% of the study area) around the tower site. Seasonal views would extend less than 0.5 miles in all directions from the tower site.

There are four (4) residences within 1,000 feet of the Easton Facility. The closest off-site residence is located approximately 753 feet to the northeast at 418 Morehouse Road.

Weather permitting, the Applicant will raise balloons with a diameter of at least three (3) feet at the Easton Facility location on the day of the Council's hearing on this Application, or at a time otherwise specified by the Council.

b. Environmental Reviews and Agency Comments

Section 16-50j of the General Statutes requires the Council to consult with and to solicit comments on the Application from the Commissioners of the Departments of Energy and Environmental Protection, Public Health, Public Utilities Regulatory Authority, Economic Development, and Transportation, the Council on Environmental Quality, and the Office of Policy and Management, Energy Division. In addition to the Council's solicitation of comments,

Homeland, as a part of the National Environmental Policy Act ("NEPA") Checklist, solicits comments on the proposed cell site from the U.S. Department of the Interior, Fish and Wildlife Service ("USFWS"), Environmental and Geographic Information Center of the Connecticut Department of Energy Environmental Protection ("DEEP") and the Connecticut Historical Commission, State Historic Preservation Officer ("SHPO"). Information on the USFWS and DEEP reviews regarding impacts on known populations of Federal or State Endangered, Threatened or Special Concern Species occurring at the proposed site are included in Attachments 10 and 11.

(1) USFWS Compliance Determination

On March 22, 2017, APT on behalf of Homeland, submitted information to the USFWS regarding the potential for impacts on Federally – listed species. (*See* Attachment 10). APT determined that one federally – listed species, the Northern Long-Eared Bat (NLEB), is known to occur in the vicinity of the Property. The Easton Facility is not, however, located in or near known NLEB hibernating or mature roost trees. The proposed Easton facility is not likely to adversely affect the NLEB. A formal response from the USFWS has not yet been received by the Applicant but will be forwarded to the Council as soon as it is available.

(2) Connecticut DEEP Review

In a letter dated December 5, 2016, the DEEP stated that it does not anticipate that the proposed Easton Facility will have any negative impacts on State-listed species (R.C.S.A. Sec. 26-306). (*See* DEEP Compliance Determination No. 201614556 dated December 5, 2016 – Attachment 11).

(3) Wetlands Inspection

As discussed in Section III.C.5.d. below, the development of the Easton Facility will have no direct impact on wetlands or water courses, the closest of which is located approximately 322 feet to the west of the proposed facility compound. A Wetland Inspection report is included in Attachment 12.

(4) State Historic Preservation Officer

On September 22, 2015, the Connecticut State Historic Preservation Office ("SHPO") determined that no historic properties will be affected by the proposed Easton Facility. A copy of the SHPO's September 22, 2015 determination letter is included in Attachment 13.

c. Maximum Permissible Exposure Calculation

The FCC has adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like those proposed in this Application. To ensure compliance with the applicable standards, Homeland asked Pinnacle Telecom Group to performed a worst-case maximum power density calculation for the proposed cell site according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) ("OET Bulletin 65"). The calculations indicate that the maximum permissible exposure level for Cellco's 700, 850, 1900 and 2100 MHz antennas together with the Town of Easton emergency service antennas would remain well below (1.1226%) the FCC's Standard. (*See* Attachment 14). Actual RF emissions levels from the proposed facility would be far below these "worst-case" calculations.

d. Other Environmental Issues

No sanitary facilities are required for the Easton Facility. The operations at the proposed

Easton Facility will not cause any significant air, water, noise or other environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the Cellco project team, the Applicant submits that the Easton Facility will have no significant adverse effect on scenic, natural, historic or recreational features, and that none of the potential effects alone or cumulatively with other effects is sufficient reason to deny this Application.

5. Consistency with Local Land Use Controls

The Council Application Guide for Community Antenna Television and Telecommunication Facilities, as amended in July 2012, requires the inclusion of a narrative summary of the project's consistency with the Town's Plan of Conservation and Development (the "Plan") and Zoning Regulations, as well as a description of planned and existing uses of the site location and surrounding properties.

a. Planned and Existing Land Uses

The proposed Easton Facility is located on an approximately 104.41-acre parcel owned by the Town. The Property is located in the Town's Residential (R3) zone district and is used for municipal purposes, including the Staples Elementary School, athletic fields, open space and a materials storage yard maintained by the Town's Public Works Department.

b. Plan of Conservation and Development

The Town of Easton's 2006 Plan of Conservation & Development (the "Plan"), does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town.

c. Zoning Regulations

According to the Town's Zoning Map, the Property is located in the R3 zone. Pursuant to Section 7.10.3 of the Easton Zoning Regulations, wireless telecommunications facilities are permitted in the R3 zone subject to Special Permit approval from the Easton Planning and Zoning Commission. Easton Zoning Regulations require towers to be set back from all property lines a distance equal to the height of the tower plus twenty-five (25) whenever the collapse of a tower would create a safety hazard to the people occupying an adjoining property. The height of the proposed tower is 150 feet. The Town's emergency service antennas and the faux tree branches extend to a height of 157 feet. The proposed tower will comply with the Town's setback requirements to the north (448' setback), east (616' setback), west (302' setback) and south (588' setback).

Easton Zoning Regulations also mandate the use of monopole towers; state that the maximum height of a tower should be 190 feet; require the site conform to State and local noise standards and FCC maximum permissible exposure standards; that the tower remain unlit unless required by the Federal Aviation Administration (FAA); and that no tower be located within three hundred (300) feet of a residence. The nearest residence is 753-feet to the northeast of the compound (418 Morehouse Road). The proposed Easton Facility complies with each of these additional requirements.

d. Inland Wetland and Watercourse Regulations

The Easton Inland Wetlands and Watercourses Commission Regulations (the "IWWC Regulations") define Regulated Activity as any operation within, or use of, a wetland or watercourse involving removal or deposition of materials, or any obstruction, construction,

alteration or pollution of such wetlands or watercourses or any operation within, or use of, any land which may disturb the natural and indigenous character of a wetland or watercourse. Four (4) copies of the Easton IWWC Regulations were filed, in bulk, with the Council.

Dean Gustafson, Professional Soil Scientist with APT, conducted a field investigation and completed a Wetland Inspection report for the proposed Easton Facility. The closest wetland area to the proposed tower site is located approximately 322 feet to the west of the facility compound. No impacts on this wetland area is anticipated. The Wetland Inspection report is included in Attachment 12.

In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council for Soil and Water Conservation, adequate and appropriate soil erosion and sedimentation control measures will be established and maintained throughout the cell site construction period. In addition, the Applicant will employ appropriate construction management practices to ensure that no pollutants would be discharged to any nearby watercourse or wetland areas or to area groundwater during the construction process.

According to the Federal Emergency Management Agency Flood Insurance Rate Map ("FIRM"), Map Number 09001C0406F (Effective June 18, 2010) the proposed facility would be located in Flood Zone X, an area outside the 500 year flood zone. A copy of the FIRM is also included in Attachment 15.

6. Local Input

Section 16-50*l*(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. Homeland approached the Town of Easton's former First Selectman, Thomas Herrmann back in February of 2012 to discuss its efforts to identify a suitable cell tower

location in the Morehouse Road area between Routes 58 and 59 in Easton. Homeland submitted a proposal to lease Town-owned property at either 515 Morehouse Road or 244 Beers Road. The Town notified Homeland early in this process that it did not wish pursue a lease for a tower site at 244 Beers Road. At this initial meeting, the Town also expressed a strong interest in enhancing its public safety (fire, police and EMS) communications network through the shared use of any tower ultimately developed by Homeland.

In April of 2012, Homeland appeared before the Easton Board of Selectmen to discuss the proposed tower development at 515 Morehouse Road. At its meeting of May 3, 2012, the Easton Board of Selectmen authorized Homeland to proceed with the development of preliminary site plans for the Morehouse Road facility. Those plans were presented to the Board of Selectmen in August of 2012, and were discussed further at the Board of Selectmen meeting on September 6, 2012. At the request of the Board of Selectmen, Homeland presented the tower development proposal to the Easton Planning and Zoning Commission ("PZC") on September 24, 2012, and conducted a site visit with local officials at the Morehouse Road site on October 11, 2012. At the September 24, 2012 PCZ meeting, the Commission also discussed the 8-24 referral from the Board of Selectmen required before the Town could lease a portion of the Town property to Homeland. On October 22, 2012, the PCZ recommended that the Board of Selectmen not enter into a lease with Homeland and expressed a desire to undertake a comprehensive study to determine the extent of the need for wireless communications service and new facilities in Easton. Homeland representatives contacted the Town again in February of 2013, to discuss the status of the comprehensive study. By that time, the Town had received a telecommunications coverage assessment from the Council and was considering both the Morehouse Road parcel and the Town-

owned Toth Park site as potential alternative facility locations. On September 19, 2013, the Homeland proposal to site a cell tower on Town property was once again before the Board of Selectman.

On October 8, 2013, the Town of Easton issued a Request for Proposal ("RFP") for a wireless facility at either the Morehouse Road property or Toth Park. In January of 2014, Homeland met with the new First Selectman, Adam Dunsby, to discuss the proposed tower siting RFP and the Town's continuing need for improvements to its municipal and emergency service communications network. On February 6, 2014, the Board of Selectmen held a public hearing attended by approximately forty (40) residents to discuss the cell tower proposal on Town property. On September 4, 2014, the Easton Board of Selectmen voted to reissue its previous RFP and send a C.G.S. § 8-24 referral to the PZC. The Board of Selectmen met again on November 6, 2014, and awarded the cell tower RFP to Homeland for development of a telecommunications facility, and selected the Morehouse Road property as the most suitable location. The PZC issued a positive referral to the Board of Selectmen on September 8, 2014.

On November 20, 2014, the Board of Selectmen held another public hearing before entering into a lease agreement with Homeland for the approved, Morehouse Road tower site. Negotiations on an Option and Land Lease Agreement were completed in December of 2014, and the agreement was fully executed between Homeland and the Town in January of 2015. Since that time, Homeland has been working with several wireless carriers in an effort to identify a carrier willing to move forward with the proposed Morehouse Road tower site and recently came to an agreement with Cellco to be the anchor tenant.

On March 31, 2017, Easton First Selectman Adam Dunsby, referencing to the extensive

municipal consultation and local input process over the last five (5) years, requested that Homeland proceed immediately to the submission of the Council application and formally waived the need for any further municipal consultation on the proposal. Because the proposed tower site is located within 2,500 feet of the Easton/Fairfield town line, Fairfield First Selectman Michael C. Tetreau also agreed to waive any further municipal consultation requirements. Copies Mr. Dunsby's and Mr. Tetreau's waiver letters are included in Attachment 16.

7. Consultations With State and Federal Officials

Attachments 10, 11 and 13 and Section III.C. of the Application describes consultations with state and federal officials regarding the proposed Easton Facility.

a. Federal Communications Commission

FCC approval of a particular tower site is not required where the authorized service area of the licensed carrier is not enlarged. The FCC did not, therefore, review this particular proposal.

b. Federal Aviation Administration

An FAA Aeronautical Evaluation for the proposed Easton Facility is included in Attachment 17. This evaluation confirms that the proposed tower would not constitute an obstruction or hazard to air navigation and no obstruction marking or lighting of the structure is required.

c. United States Fish and Wildlife Service

See Section III.C.4.b.(1) above.

d. Connecticut Department of Energy and Environmental Protection

(1) Environmental and Geographic Information Center

See Section III.C.4.b.(2) above.

(2) Bureau of Air Management

Under normal operating conditions, Cellco's equipment at the Easton Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a diesel-fueled generator to provide emergency back-up power. Cellco's back-up generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b, and therefore is exempt from general air permit requirements.

e. Connecticut State Historic Preservation Officer

See Section III.C.4.b.(3) above.

D. Estimated Cost and Schedule

1. Overall Estimated Costs

The total estimated cost of construction for the Easton Facility is $855,250. This estimate includes:

Homeland Towers, LLC

(1)	Tower and foundation costs of approximately	$225,000
(2)	Site development costs of approximately	112,000
(3)	Utility installation costs of approximately	38,250
	Subtotal – Homeland Towers, LLC	375,250

Cellco Partnership d/b/a Verizon Wireless

(1)	Cell site radio equipment costs of approximately	$300,000
(2)	Antenna and coax costs of approximately	95,000
(3)	Power systems costs of approximately	40,000
(4)	Equipment costs of approximately	45,000
	Subtotal – Cellco Partnership d/b/a Verizon Wireless	480,000

2. Overall Scheduling

Site preparation and engineering would commence following Council approval of the Development and Maintenance ("D&M") Plan and are expected to be completed within two to four weeks. Due to the delivery schedules of the manufacturers, installation of the platform and installation of the tower are expected to take an additional two to four weeks. Equipment installation is expected to take an additional two weeks after installation of the platform and installation of the tower. Cell site integration and system testing is expected to require two weeks after equipment installation.

IV. CONCLUSION

Based on the facts contained in this Application, the Applicant submits that the establishment of the Easton Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town of Easton and throughout northern Fairfield County, as determined by the FCC and the United States Congress, and a competitive framework for providing such service has been established by the FCC and the Telecommunications Act of 1996. Cellco submits that the need for these services, in general, and the Easton Facility, in particular, far outweighs any possible environmental effects resulting from

the construction of the proposed cell site.

WHEREFORE, Homeland Towers, LLC respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Easton Facility.

Respectfully submitted,

HOMELAND TOWERS, LLC

By: _____

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