

July 18, 2017

Robert Stein, Chairman
Members of the Council
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 473 – 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**

Dear Chairman Stein and Members of the Council:

On behalf of Homeland Towers, LLC (“Homeland”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced Application for the construction, operation and maintenance of a new telecommunications facility in Easton, Connecticut.

On April 21, 2017, Homeland and Cellco (collectively, the “Applicant”) filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Easton Facility”) in the southerly portion of a 104.41-acre parcel at 515 Morehouse Road in Easton, Connecticut (the “Property”). The Property is owned by the Town of Easton (“Town”) and is used for municipal (Department of Public Works), educational (Staples Elementary School), recreational (athletic fields) purposes. The Easton Facility would provide Cellco customers with improved wireless telecommunications services in Easton. The tower would also be shared by the Town and would improve the Town’s emergency service communications capabilities.

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Facility Description

In accordance with its Land Lease Agreement with the Town, Homeland proposed to construct and maintain a 150-foot tower, disguised as a pine tree (a “monopine”) in the southerly portion of the Property within a 70’ x 70’ fenced compound. The southerly portion of the Property is currently used for outdoor storage of materials and debris by the Town’s Public Works Department. Cellco would install antennas and remote radio heads on an antenna platform at the 145-foot level on the tower. The Town would install antennas at the 150-foot, 95-foot and 75-foot levels on the tower. Cellco’s and the Town’s radio equipment would be located within the facility compound. Cellco would also install a diesel fueled generator to provide backup power to its equipment. Access to the tower site would extend from Morehouse Road over the existing paved and gravel driveway on the Property, a distance of approximately 1,650 feet, then over a short gravel driveway extension an additional distance of 315 feet to the tower site.

The record in Docket No. 473 contains unrefuted evidence that there is a need to improve Cellco’s wireless service in Easton and the Town’s emergency service communications network. The record also contains ample evidence that the nature of the probable environmental effect associated with the proposed facility are not substantial and does not outweigh the need for the facility.

Public Need

The evidence in the Docket No. 473 record reveals significant gaps in wireless service in each of Cellco’s operating frequencies in the Town of Easton. These gaps cannot be satisfied by service from Cellco’s existing surrounding cell sites. The proposed Easton facility will fill these existing wireless service gaps, particularly along Routes 58, 59 and 136 in Easton. In addition, the proposed Easton facility will provide capacity relief to Cellco’s existing Fairfield and Plattsville facilities which are currently operating at or near their existing capacity limits. In addition, Easton’s First Selectman, Police Chief, Fire Chief, Fire Marshal and EMS Chief all spoke in support of the application due to the need for improved emergency service communications throughout the Town.

Nature of Probable Environmental Impacts

The record contains ample evidence to support a finding by the Council that the Easton Facility would not have a significant adverse impact on the environment at the Property or the

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surrounding area. Cellco has presented evidence that the location and development of the Easton Facility will have no effect on historic or archeological resources; will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not have any direct impact on wetlands or watercourses near the cell site; will not be considered to be an obstruction or hazard to air navigation and, therefore, will not require any FAA marking or lighting; and will operate well within safety limits established by the FCC for radio frequency emissions.

Visual Impacts

Generally speaking, the primary impact of any telecommunications facility is visual. The overall area where some portion of the proposed Easton Facility tower may be visible year round (above the tree line), is conservatively estimated to be approximately 106 acres (1.3% of the 8,042-acre study area). Year-round views are generally limited to areas to the north and east along Morehouse Road within about 0.6 miles of the facility. Seasonal views, through intervening trees and branches are anticipated to occur within an area of approximately 281 additional acres (4.8% of the 8,042-acre study area), all within approximately 0.5 miles of the facility. There are only four (4) residential structures within 1,000 feet of the Easton Facility. The closest residence is located approximately 753 feet to the northeast at 418 Morehouse Road. Views of the facility from Morehouse Road and the closest Morehouse Road residences will be obstructed, for the most part, by existing vegetation and topography in the area.

Public Input

Homeland commenced its local input process back in February of 2012. Over the next three (3) years, Homeland participated in numerous meetings, presentations and public hearings regarding the tower proposal. The Town and Homeland entered into a lease agreement in January of 2015.

Monopole v. Monopine

At the request of the Town, Homeland proposed the installation of a “monopine” tower at the Property. During the hearing, several Council members and members of Homeland’s witness panel questioned whether the “monopine” design was appropriate given the setting and location of the facility. In a letter to First Selectman Adam Dunsby dated July 14, 2017, the Town’s Planning and Zoning Commission, expressed a preference for a “monopole” tower at the Property.

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Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Easton Facility and that the environmental impacts from the proposed facility location would be limited and outweighed by the benefits to the public.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kenneth C. Baldwin', written in a cursive style.

Kenneth C. Baldwin

KCB/kmd

Copy to:

Raymond Vergati (*via electronic mail*)
Anthony R. Befera (*via electronic mail*)
Pamela Westmoreland (*via electronic mail*)