

**CONNECTICUT SITING COUNCIL**  
**DOCKET NO. 475**

IN THE MATTER OF:

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APPLICATION OF 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 IN  
COVENTRY, CONNECTICUT

APPLICANT'S POST-HEARING BRIEF

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Submitted by:

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

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**TABLE OF CONTENTS**

	<b>Page</b>
EXECUTIVE SUMMARY.....	1
Facility Description.....	1
Public Need.....	1
Nature of Probable Impacts.....	2
Visibility .....	2
Public Input.....	3
Conclusion .....	3
I.    INTRODUCTION.....	4
II.   PROCEDURAL BACKGROUND.....	4
III.  FACTUAL BACKGROUND .....	5
A.    Pre-Application History .....	5
B.    Local Contacts.....	6
C.    Tower Sharing.....	6
D.    The Coventry NW Facility Proposal.....	7
IV.  THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. § 16-50P FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED.....	7
A.    A Public Need Exists for a Coventry NW Facility .....	8
B.    The Nature of Probable Environmental Impacts are not Sufficient Reasons to Deny the Application .....	10
1.    Natural Environment and Ecological Balance .....	10
2.    Public Health and Safety.....	11
3.    Scenic Values.....	12
4.    Historical Values.....	13
5.    Recreational Values .....	14
6.    Forests and Parks .....	14
7.    Air and Water Quality.....	14
8.    Fish and Wildlife.....	15

**TABLE OF CONTENTS**  
(continued)

	<b>Page</b>
C. The Application Should Be Approved Because The Benefits Of The Proposed Facility Outweigh Any Potential Impacts .....	16
V. CONCLUSION .....	17

## **EXECUTIVE SUMMARY**

On June 28, 2017, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) filed an application (“Application”) with the Connecticut Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (“Certificate”) to construct a wireless telecommunications facility on an approximately 24.2-acre portion of the Skungamaug Golf Course, south of Folly Lane in Coventry, Connecticut (the “Property”). The Property is owned by the John Motycka (“Owner”). The cell site is identified as Cellco’s “Coventry NW Facility”.

### **Facility Description**

Cellco proposes to construct a 140-foot monopole tower in the central portion of the Property adjacent to the golf course maintenance building and materials storage area. Cellco would install nine (9) panel-type antennas at a centerline height of 140 feet above ground level (“AGL”). Equipment associated with the antennas and a 15 kW propane-fueled back-up generator will be attached to a steel platform with a canopy roof structure on the ground near the base of the tower. A 500 gallon propane tank will be installed on a 4’ x 8’ concrete pad in the corner of the facility compound. All Coventry NW Facility improvements would be located within a 40’ x 60’ fenced compound and 100’ x 100’ leased area. Access to the Coventry NW Facility would extend from Folly Lane over an existing paved and gravel driveway serving the existing parking area and maintenance facility, a distance of approximately 520 feet.

### **Public Need**

The proposed wireless facility is needed to fill gaps in wireless service in Coventry and Tolland, Connecticut, particularly along portions of Routes 195, 44 and Goose Lane and provide

capacity relief to Cellco existing Coventry North (Gamma sector) and Tolland (Gamma sector) cell sites.

### **Nature of Probable Impacts**

The record contains ample evidence to support a finding by the Council that the Coventry NW Facility would not have a significant adverse impact on the environment. Cellco has presented evidence that the location and development of the Coventry NW Facility will have no effect on historic properties in the area; will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not have any direct or indirect impact on wetlands, watercourses and/or vernal pools on the Property or near the proposed cell site; will not require any FAA marking or lighting; and will operate well within safety limits established by the FCC for radio frequency emissions.

### **Visibility**

The overall areas where the tower would be visible above the tree canopy comprise approximately 77 acres, or 0.96 percent of the two-mile radius (8,042 acre) study area. Year-round visibility of the Coventry NW Facility tower is limited to locations on the Property and portions of the Skungamaug Golf Course to the north. Areas where seasonal views are anticipated comprise approximately 190 additional acres. Visual impacts of the Coventry NW Facility are limited due to a combination of topography and dense tree cover in the area.

There are five (5) residences within 1,000 feet of the Coventry NW Facility. The closest off-site residence is located at 62 Folly Lane, approximately 660 feet to the northwest of the tower site. The Coventry NW Facility is not within 250 feet of any school or commercial daycare facility.

### **Public Input**

On February 22, 2017, Cellco representatives met with Coventry's Town Manager, John Elsesser and Land Use Director, Eric Trott to commence the ninety (90) day municipal consultation process. Mr. Elsesser and Mr. Trott received copies of technical information summarizing Cellco's plans to establish a telecommunications facility as described above. At the request of the Town, Cellco was asked to appear before the Coventry Planning and Zoning Commission, who hosted a Public Information Meeting ("PIM") on April 10, 2017. At this meeting, Cellco discussed, in detail, the aspects of the proposed Coventry NW Facility, the need for improved wireless service and the Connecticut Siting Council application process. Notice of the PIM was sent to abutting property owners and was published in *The Chronicle*.

### **Conclusion**

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Coventry NW Facility and that the environmental impacts from the proposed facility location would be minimal.

## **I. INTRODUCTION**

On June 28, 2017, Cellco Partnership d/b/a Verizon Wireless (“Cellco” or “Applicant”) filed with the Connecticut Siting Council (“Council”) an application (the “Application”) for a certificate of environmental compatibility and public need (“Certificate”), pursuant to Sections 16-50g *et seq.* of the Connecticut General Statutes (“Conn. Gen. Stat.”), for the construction, maintenance and operation of a wireless telecommunications facility (the “Coventry NW Facility”) on an approximately 24.2-acre portion of the Skungamaug Golf Course, south of Folly Lane in Coventry, Connecticut (the “Property”). The Property is owned by John Motycka. (Cellco Exhibit 1 (“Cellco 1”); October 24, 2017 Site Visit). The proposed wireless facility is needed to fill gaps in wireless service in portions of Coventry and Tolland, Connecticut, particularly along portions of Route 195 and Route 44 and Goose Lane, and provide capacity relief to Cellco existing Coventry North and Tolland cell sites. (Cellco 1, pp. 6-7, Tabs 1 and 6).

## **II. PROCEDURAL BACKGROUND**

On October 24, 2017, the Council conducted an evidentiary hearing and an evening public hearing on the Application (October 24, 2017 Afternoon Transcript (“Tr. 1”, p. 4); October 24, 2017 Evening Transcript (“Tr. 2”, p. 74)). Prior to the evidentiary hearing, at 2:00 p.m. the Council conducted a site visit at the Property. On the day of the site visit, Cellco attempted to fly a balloon to simulate the height of the tower as prescribed by the Council. Due to strong winds, this effort was largely unsuccessful. A red balloon was aloft during a portion of the Council’s site visit. (Tr. 1, pp. 14-15).

This Post-Hearing Brief is filed on behalf of the Applicant pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”). The brief evaluates the Application in light of the Council’s review criteria, as set forth in Section 16-50p of the

Connecticut General Statutes and addresses other issues raised throughout the course of this proceeding.

### **III. FACTUAL BACKGROUND**

#### **A. Pre-Application History**

Cellco is licensed to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges in Coventry and throughout Connecticut. Cellco currently provides wireless service in Coventry and the surrounding towns from its existing Tolland 2, Tolland, Mansfield North, Coventry North, Columbia, Bolton and Bolton East cell sites. Plots showing the extent of reliable wireless service in northern Coventry and southern Tolland reveal significant “coverage gaps” along portions of Routes 195 and 44 as well as Goose Lane and other roads in the area in all of Cellco’s operating frequencies. These coverage gaps will be filled by service from the Coventry NW Facility. (Cellco 1, Tab 6; Cellco 5). In addition to the coverage benefits, the proposed Coventry NW Facility will provide capacity relief to Cellco’s Coventry North cell site (Gamma sector) and Tolland cell site (Gamma sector). (Cellco 1, pp. 6-7, Tab 6; Cellco 5).

Cellco maintains seven (7) existing facilities within approximately six (6) miles of the Coventry NW Facility location. These existing sites along with recently approved cell site to the west will interact with the proposed Coventry NW Facility. (Cellco 1, pp. 7-9, Tabs 6 and 8; Tr. 1, pp. 20-23). These adjacent sites cannot, however, satisfy Cellco’s need for additional wireless service in northwest Coventry. Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the area around the proposed cell site. If a new tower



must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the facility could be reduced to the greatest extent possible. (Cellco 1, pp. 10-12 and 13-14, Tabs 8 and 9). Following this site search effort, Cellco selected the Property at Folly Lane to present to the Council. Cellco determined that an antenna centerline height of 140 feet AGL at this location would satisfy its wireless service objectives.

B. Local Contacts

On February 22, 2017, Cellco representatives met with Coventry's Town Manager, John Elsesser and Land Use Director, Eric Trott to commence the ninety (90) day municipal consultation process. Mr. Elsesser and Mr. Trott received copies of technical information summarizing Cellco's plans to establish a telecommunications facility as described above. At the request of the Town, Cellco representatives appeared before the Town's Planning and Zoning Commission ("PZC") who hosted a Public Information Meeting ("PIM") at the Coventry Town Hall Annex on April 10, 2017. At this meeting, Cellco discussed, in detail, the aspects of the proposed Coventry NW Facility, the need for wireless service in Coventry and the Connecticut Siting Council application process. Notice of the PIM was sent to ten (10) adjoining property owners and, on March 27, 2017, was published in *The Chronicle*. (Cellco 1, pp. 18-19, Tab 15).

C. Tower Sharing

Cellco will design the facility tower and compound to be shared by other wireless carriers as well as local and county 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. (Cellco 1, pp. 11-12). At the Council's October 24,

2017 hearing, James McLoughlin, Coventry's Fire/EMS Administrator and Emergency Management Director and Douglas Racicot, Operations Director for the Tolland County Mutual Aid Fire Service, Inc. spoke and expressed a desire to share Cellco's proposed Coventry NW Facility. (Tr. 1, pp. 6-8; Tr. 2, pp. 79-80).

D. The Coventry NW Facility Proposal

The Coventry NW Facility would be located within a 40' x 60' fenced compound (100' x 100' leased area) in the central portion of an approximately 24.2-acre parcel, a portion of the Skungamaug Golf Course, south of Folly Lane in Coventry. At this location, Cellco would construct an 140-foot self-supporting monopole tower. Cellco would install nine (9) panel-type antennas at the 140-foot level. Vehicular access to the site would extend from Folly Lane over an existing paved and gravel driveway a distance of approximately 520 feet. Utilities will extend from existing service along Folly Lane. (Cellco 1, pp. iii, 7-8, Tab 1).

Cellco would also install a steel equipment platform and canopy structure on the ground near the base of the tower to support its radio equipment and a 25 kW propane-fueled back-up generator. The tower, equipment platform and a 500 gallon propane tank would be located within a 40' x 60' fenced compound. Cellco's equipment would be equipped with a silent intrusion and system alarms and will be monitored on a 24-hour basis to receive and to respond to incoming alarms or other technical problems. (Cellco 1, pp. 7-9, Tab 1).

**IV. THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. § 16-50P FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

Section 16-50p of the Public Utility Environmental Standards Act ("PUESA"), Conn. Gen. Stat. § 16-50g *et seq.*, sets forth the criteria for Council decisions in Certificate proceedings and

states, in pertinent part:

In a certification proceeding, the council shall render a decision upon the record either granting or denying the application as filed, or granting it upon such terms, conditions, limitations or modifications of the construction or operation of the facility as the council may deem appropriate . . . . The council shall file, with its order, an opinion stating in full its reasons for the decision. The council shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (A) . . . a public need for the facility and the basis of the need; (B) The nature of the probable environmental impact . . . including a specification of every significant adverse effect . . . whether alone or cumulatively with other effects, impact on, and conflict 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; (C) Why the adverse effects or conflicts referred to in subparagraph (B) of this subdivision are not sufficient reason to deny the application . . . .

Conn. Gen. Stat. § 16-50p(a).

Under Section 16-50p, the Applicant must satisfy two key criteria in order for the Application to be granted and for a Certificate to issue. First, the Applicant must demonstrate that there is a “public need for the facility.” Conn. Gen. Stat. § 16-50p(a)(3)(A). Second, the Applicant must identify “the nature of the probable environmental impact” of the proposed facility through review of the elements specified in Conn. Gen. Stat. § 16-50p(a)(3)(B), and then demonstrate that these impacts “are not sufficient reason to deny the application.” Conn. Gen. Stat. § 16-50p(a)(3)(C). The evidence in the record for this docket establishes that the above criteria have been satisfied and that the Applicant is entitled to a Certificate.

A. A Public Need Exists for a Coventry NW Facility

As noted in the Application, the FCC in its Report and Order released on May 4, 1981 (FCC Docket No. 79-318) recognized a public need on a national basis for technical improvement, wide area coverage, high quality and a degree of competition in mobile telephone service. The Federal Telecommunications Act of 1996 (the “Telecommunications Act”) emphasized and

expanded on these aspects of the FCC's 1981 decision. Among other things, the Telecommunications Act recognized an important nationwide public need for high quality personal wireless telecommunications services of all varieties. The Telecommunications Act also expressly promotes competition and seeks to reduce regulation in all aspects of the telecommunications industry in order to foster lower prices for consumers and to encourage the rapid deployment of new telecommunications technologies. (Cellco 1, pp. 4-6; Council Adm. Notice 4).

In 2009, President Obama issued Presidential Proclamation 8460, in which "cellular phone towers" were identified as critical infrastructure vital to national security. (Cellco 1, p. 5; Council Adm. Notice 11). The same year, the United States Congress directed the FCC to develop a national broadband plan to ensure that every American has access to (wireless) broadband capability. The FCC released Connecting America: The National Broadband Plan (the "Broadband Plan") a year later, which recognized broadband as a "foundation for economic growth, job creation, global competitiveness and a better way of life." One of the Plan's goals for 2020 is for the United States to "lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation." (Cellco 1, pp. 4-6; Council Adm. Notice 18).

The proposed Coventry NW Facility would be part of Cellco's expanding wireless telecommunications network envisioned by the Telecommunications Act and the Broadband Plan and has been developed to help meet these nationwide goals. In particular, Cellco's system has been designed, and the cell site proposed in this Application has been selected, so as to maximize the geographical coverage, improve network capacity and improve the overall quality of wireless service to allow for the efficient and reliable use of Cellco's network. (Cellco 1, pp. 6-7). As the Council is aware, Cellco holds FCC licenses to provide wireless services in the 700 MHz, 850

MHz, 1900 MHz and 2100 MHz frequency ranges in Tolland County, and throughout the State of Connecticut. (Cellco 1, Tab 5).

The record contains ample, written evidence and testimony that Cellco's antennas at a height of 140 feet AGL at the Coventry NW Facility would allow Cellco to satisfy its wireless service objectives in northern portions of Coventry and southern portions of Tolland. (Cellco 1, pp. 6-7, Tab 6; Cellco 5).

The proposed Coventry NW Facility would provide reliable wireless service to portions of Routes 195 and 44 as well as Goose Lane and other local roads in the area in Coventry and Tolland, and an overall coverage footprint of 10.28 square miles at 700 MHz; 8.67 square miles at 850 MHz; 3.98 square miles at 1900 MHz; and 3.83 square miles at 2100 MHz. (Cellco 1, p. 8, Tab 6; Cellco 5).

The Coventry NW Facility would also provide capacity relief to the Coventry North (Gamma sector) and Tolland (Gamma sector) cell sites which are currently beyond their existing capacity limits. (Cellco 1, p. 7; Tr. 1, pp. 19 and 60-62)

B. The Nature of Probable Environmental Impacts are not Sufficient Reasons to Deny the Application

The Docket No. 475 record demonstrates that the probable environmental impacts of the Coventry NW Facility are not sufficient reason to deny the Certificate Application.

1. Natural Environment and Ecological Balance

The proposed development of the Coventry NW Facility has eliminated, to the extent possible, impacts on the natural environment. All facility improvements would be located within a 40' x 60' fenced compound, previously cleared by the Owner and currently used for material and debris storage. Access to the tower site would extend from Folly Lane over an existing paved

and gravel driveway, a distance of approximately 520 feet. Only one (1) tree, larger than 6” diameter at breast height, will need to be removed and minimal grading would be required for construction of the facility compound. (Cellco 1, pp. 1-2, Tab 1). A small retaining wall, ranging in height from one-foot tall to five-foot tall (in the northwest corner of the compound) would be constructed around the facility compound. (Cellco 1, Tab 1). As discussed during the site walk and evidentiary hearing, a fairly minor re-design of the northwest and southwest portions of the tower compound could result in less overall grading near the northwest corner of the compound and potentially the lowering of the proposed retaining wall further reducing site development impacts. (Cellco 1, Tab 1; Tr. 1, pp. 42-43). Overall, the Coventry NW Facility development would have a negligible impact on the physical environment of the Property. No evidence to refute this conclusion was presented to the Council.

## 2. Public Health and Safety

Cellco has considered several factors in determining that the nature and extent of potential public health and safety impacts resulting from installation of the Coventry NW Facility would be minimal or nonexistent.

First, the potential for the facility tower to fall does not pose an unreasonable risk to health and safety. The approved tower would be designed and built to meet Telecommunications Industry Association (TIA) standards. The closest off-site residence is located approximately 660 feet to the northeast of the proposed tower site at 62 Folly Lane. (Cellco 1, p. 14, Tab 1).

Second, worst-case potential public exposure to Radio Frequency (“RF”) emissions from the proposed facility would be well below the FCC Safety Standards. (Cellco 1, p. 16, Tab 1, p. 8, Tab 13).

If approved, the Cellco will design the facility tower and compound to be shared by other wireless carriers, if a need exists and emergency service communications providers.

Representatives from the Town and the Tolland County Mutual Aid Fire Service attended the Council's evidentiary and public hearing and expressed an interest in sharing the proposed tower site. This type of tower sharing arrangement would reduce, if not eliminate, the need for other carriers or emergency service entities to develop a separate tower in this same area in the future. (Cellco 1, pp. 11-12; Tr. 1, pp. 6-8; Tr. 2, pp. 79-80).

Overall, the nature and extent of potential, adverse public health and safety impacts resulting from construction and installation of the Coventry NW Facility would be minimal or nonexistent. The public safety benefits, however, would be substantial. No evidence to refute these conclusions was presented to the Council.

### 3. Scenic Values

As noted in the Application, the primary impact of any tower is visual. Cellco's site search methodology, described in the Site Search Summary, is designed in large part to minimize such visual impacts. As discussed above, wherever feasible, Cellco avoids construction of a new tower by first attempting to identify use and existing towers or other tall non-tower structures in or near a particular search area. Cellco currently shares seven (7) existing towers, all within approximately six (6) miles of the proposed Coventry NW Facility. Each of these existing cell sites will interact with the proposed Coventry NW Facility. However, these adjacent sites cannot satisfy Cellco's need for wireless service in and near the designated Coventry NW Facility search area. Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No such non-tower structures of suitable height exist or were

available for lease. (Cellco 1, pp. 10-12, Tabs 6 and 8). If it determines that a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the site may be reduced to the greatest extent possible. (Cellco 1, Tab 8).

Cellco submitted a Visibility Analysis prepared by All-Points Technology Corporation (“APT”) as a part of the Application. Prior to preparing its report, APT conducted multiple balloon floats and extensive field reconnaissance surveys with leaves off the trees to obtain photographs for use in the Visibility Analysis. APT presented photo documentation from 42 locations around the proposed cell site. (Cellco 1, Tab 9; Tr. 1, p. 18). APT determined that top portions of the tree tower would be visible above the tree canopy from approximately 77 acres or 0.96 percent of the two-mile radius (8,042 acre) study area. Year-round visibility of the Coventry NW Facility is generally limited to locations on the Property and on portions of the golf course parcel to the north off Folly Lane, within approximately 0.11 miles of the tower site. Areas where seasonal views are anticipated comprise approximately 190 additional acres. A majority of year-round views are from locations of the Property and within the immediate vicinity of the tower site and from a few locations along North Farms Road to the west. (Cellco 1, Tab 9). Seasonal views of the tower, through the trees would be limited to parcels within 0.6 miles of the compound. Overall, the proposed Coventry NW Facility will, therefore, have no significant visual effect on the north Coventry community. Finally, there are no schools or commercial daycare facilities located within 250 feet of the facility. (Cellco 1, pp. 13-14, Tab 9).

#### 4. Historical Values

As it does with all of its tower proposals, prior to filing the Application with the Council,



Cellco requested that the State Historic Preservation Office (“SHPO”) of the Connecticut Historical Commission (the “Commission”) review the proposed facility and provide a written response. In a letter dated August 16, 2017, the SHPO confirmed that no historic properties will be affected by the proposed Coventry NW Facility. (Cellco 7).

5. Recreational Values

There are no recreational activities or facilities on the Property that would be adversely impacted by development of the Coventry NW Facility. The Skungamaug Golf Course will continue to operate, unaffected by the proposed facility. (Cellco 1, p. 16, Tabs 1 and 9).

6. Forests and Parks

There is no State or local forests or park land that will be adversely impacted as the proposed Coventry NW Facility tower. (Cellco 1, Tab 9). No evidence to refute this conclusion was presented to the Council.

7. Air and Water Quality

a. Air Quality.

Under normal operating conditions, the Cellco equipment at the Coventry NW Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a propane-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. (Cellco 1, p. 20; Tr. 1, p. 41).

b. Water Quality.

The proposed Coventry NW Facility would not utilize water, nor would it discharge

substances into any surface water, groundwater, or public or private waste water disposal system. Dean Gustafson, Professional Soil Scientist with APT, conducted a field investigation and completed a Wetlands & Vernal Pool Evaluation for the Coventry NW Facility. According to this evaluation, the closest on-site wetland area is located approximately 40 feet from the facility compound and 23 feet from a portion of the proposed access driveway. This wetland area is a narrow anthropogenic (man-made) drainage ditch. The identified area maintains no special aquatic habitat. In the Wetlands Evaluation, Mr. Gustafson concludes that the Coventry NW Facility will have no direct or adverse impact to wetlands and watercourses on the Property. (Cellco 1, p. 15, Tabs 1 and 11; Tr. 1, pp. 34-37). No evidence to refute these conclusions was presented to the Council.

#### 8. Fish and Wildlife

As a part of its National Environmental Policy Act (“NEPA”) Checklist, Cellco has reviewed the proposed Coventry NW Facility for compliance with the U.S. Department of Interior, Fish and Wildlife Service (“USFWS”) and the Connecticut Department of Energy and Environmental Protection (“DEEP”) impact requirements related to federal and State listed threatened or endangered species, including migratory birds in order to determine if the proposed facility would have an adverse effect on these species. According to the Preliminary USFWS, Migratory Birds and NDDDB Compliance Determination dated June 8, 2017, one (1) federally listed “threatened” species, the *Northern Long-Eared Bat* (NLEB) may occur in Coventry, Connecticut. Dean Gustafson with APT Corporation prepared and submitted a NLEB Streamlined Consultation report to the USFWS. This report concludes that the proposed Coventry NW Facility “is not likely to adversely affect” an NLEB. The Coventry NW Facility will also comply with the USFWS

recommended guidelines for reducing impacts to migratory birds. (Cellco 1 pp. 14-15, Tab 10). Finally, the DEEP does not anticipate negative impacts to State-listed species resulting from the construction of the proposed Coventry NW Facility. (Cellco 3).

C. The Application Should Be Approved Because The Benefits Of The Proposed Facility Outweigh Any Potential Impacts

Following a determination of the probable environmental impacts of the Coventry NW Facility site, Conn. Gen. Stat. § 16-50p requires that the Applicant demonstrate why these impacts “are not sufficient reason to deny the Application.” Conn. Gen. Stat. § 16-50p(a)(3). The record establishes that the impacts associated with the proposal would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application.

As discussed above, the only potential adverse impact from the proposed tower involves “scenic values.” As the record overwhelmingly demonstrates, the Coventry NW Facility would have minimal impacts on scenic values in the area. (Cellco 1, Tab 9). These limited aesthetic impacts may be, and in this case are, outweighed by the public benefit derived from the establishment of the facility. Unlike many other types of development, telecommunications facilities do not cause indirect environmental impacts, such as increased traffic and related pollution. The limited aesthetic and environmental impacts of either alternative site can be further mitigated by the sharing of the facility. Cellco intends to design the tower so that it could be shared by other wireless carriers, and the Town, or local emergency service providers, if a need exists. (Cellco 1, pp. 11-12; Tr. 1, pp. 6-8; Tr. 2, pp. 79-80).

In sum, the potential environmental impacts from the Coventry NW Facility would be minimal when considered against the benefits to the public. These impacts are insufficient to deny

the Application. The site, therefore, satisfies the criteria for a Certificate pursuant to Conn. Gen. Stat. § 16-50p, and the Applicant's request for a Certificate should be granted.

**V. CONCLUSION**

Based on the overwhelming evidence in the record, the Applicant has established that there is a need for a Coventry NW Facility and that the environmental impacts associated with the Application would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application. Therefore, the Council should approve the Application as submitted.

Respectfully submitted,  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By: 

Kenneth C. Baldwin  
ROBINSON & COLE LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
Its Attorneys