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3/23/18

BY FEDEX

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

Re: Docket 480
SectorSite, LLC & T-Mobile Northeast
Proposed Wireless Telecommunications Tower Facility
2 Westwoods Drive, Farmington, Connecticut: Town-owned Property

Dear Chairman Stein and Members of the Siting Council:

On behalf of SectorSite, LLC (“SectorSite”) and T-Mobile Northeast (“T-Mobile”), the Applicants, please accept this letter brief in support of the Certificate Application in Docket 480. This letter brief is submitted in accordance with the 30-day post hearing time frame established by the Council for the receipt of written comments. Set forth below is an outline of the reasons we believe the record in the proceeding supports approval of a Certificate for the proposed facility located on Town-owned property in Farmington. It is noted that there were no parties or intervenors in this proceeding.

Coverage Objectives & Public Need

T-Mobile identified a need for a facility to provide reliable wireless service to the southwestern portion of the Town of Farmington (the “Town”) over 13 years ago and entered into a lease with the Town for the proposed site in 2006 to fulfill its coverage objective. [Applicants Ex. 3]. The objective of a T-Mobile site in this area is to provide reliable wireless service in the area of the intersection of Routes 6 and 177, Cope Farm Road, Greencrest Drive, Westwoods Drive as well as other roadways and properties in the area, including Tunxis Community College. [Applicants Ex. 1, Attachment 1, 2/22/18 Transcript, pg. 29]. T-Mobile's radiofrequency (“RF”) engineers establish site search areas where new wireless facilities are needed to address the public's inability to obtain reliable service in its wireless network. T-Mobile experiences gaps in coverage in the southwest area of Farmington in the vicinity of the intersection of Routes 6 and 177 and nearby neighborhoods and developed a search area to address the lack of reliable service in this area. T-Mobile's long-identified gaps in reliable service in this area are documented in this proceeding by



models which were based on drive data and less than desirable performance statistics for the surrounding cells leading to this area. [Applicants Ex. 1, Attachment 1; Applicants Ex. 4, A.29].

When T-Mobile assigned its lease with the Town to SectorSite in 2017, T-Mobile and SectorSite together evaluated this area to determine whether any existing towers or tall structures were available for installation of a new facility since the lease for the proposed Town-owned site was executed in June of 2006. After evaluation of eight locations, the Applicants determined that no existing structures or wireless facilities were available for a new T-Mobile facility to provide service to meet T-Mobile's coverage objective. [Applicants Ex. 1, Attachment 2].

As part of the proceeding, T-Mobile's RF engineer, Mr. Scott Heffernan, testified that the proposed tower site would provide the needed service to the area around the intersection of Routes 177 and 6, surrounding areas as well as Tunxis Community College and the few businesses near the college. Indeed, Mr. Heffernan explained that none of the other locations evaluated would provide reliable service to both the area in the vicinity of Routes 177 and 6 and the community college. [2/22/18 Transcript, pg. 29-30]. Mr. Heffernan testified that even with the limitations of the flagpole design at the Town-owned site, the proposed facility would provide needed coverage to both objectives. Mr. Heffernan confirmed that T-Mobile was actively involved in the selection of the site back in 2006 and when asked if he would select the proposed flagpole facility site today, he responded that he would because it provides needed coverage. [2/22/18 Transcript pg. 25, 28-31, 88 & 89].

T-Mobile plans to utilize both 2100 MHz and 700 MHz spectrum on this facility. However, since T-Mobile only holds a 5 MHz license in the 700 MHz band, the majority of traffic will be handled by the 2100 MHz coverage layer. [Applicants Ex. 4, A.25; 2/22/18 Transcript pg. 30-31]. The RF testimony also established that the proposed centerline height of 127 feet would not change for a different tower design where all antennas are located at the same height. [Applicants Ex. 4, A.28].

In addition to T-Mobile's testimony the Council also received correspondence from Verizon indicating that while it has no current plans to build a facility in the area it does have an identified need and would be able to use the proposed facility at the 97 feet and 107 feet levels. [Comments from Verizon Wireless dated 1/23/18].

Based on the evidence and information submitted to the Council, it is respectfully submitted that the public need for a new tower facility in this area of Farmington to provide coverage where adequate and reliable coverage does not exist today is simply not at issue in this Docket. Moreover, it should be noted that no competent evidence or testimony was offered by any others to rebut T-Mobile's testimony on the subject of a public need for a new tower in this part of Farmington.

The Tower Facility Will Have No Significant Environmental Impacts

Pursuant to C.G.S. Section 16-50p, the Council is required to find and determine as part of a Certificate application any probable environmental 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. It is respectfully submitted that the facility as proposed in this Docket will have no *significant* adverse environmental effects on the resources listed in Section 16-50p of the General Statutes.

Potential Visual Effects

The record in this Docket demonstrates that the proposed flagpole facility will not have a significant visual impact on scenic resources or residences in the vicinity of the site given the flagpole design and the approximately 230-acre size of the host property. There are no state/municipal parks, recreation areas, conservation areas, trails, scenic byways/vistas, or properties listed on the National Register of Historic Places located within the 1/2-mile study area. The State Historic Preservation Office (“SHPO”) confirmed that the proposed flagpole facility will have no impact on historic properties. The SHPO also confirmed that the proposed facility will have no impact on the Joseph Fagan House, which was identified within a Historic Resource Survey and is located on Town-owned property across the street a distance of approximately 500 feet from the proposed site. [Applicants Ex. 1, Attachment 7; Applicants Ex. 4, A.16, Attachment 4]. The proposed flagpole facility is not located within 250 feet of a school or licensed daycare center. [Applicants Ex. 4, A.21, Attachment 5].

The visual consultant for the Application, Virtual Site Simulations, LLC, estimates that the total seasonal views of the flagpole facility will occur within approximately 4.8% of the 1-mile radius study area. Most of these views will occur within the large approximately 230-acre project site. Based on Virtual Site Simulations analysis, the farm across the street will have views of the flagpole and approximately six residences along Plainville Avenue will have partial views. Two residences located across the cornfield west of the site will have distant views of the flagpole. [Applicants Ex. 1, Attachment 7; 2/22/18 Transcript, pg. 15-17].

Virtual Site Simulations, LLC also determined that the facility flood lighting required by the Federal Aviation Administrations (“FAA”) will not result in adverse visual impacts or impact the results of the Viewshed Analysis Report. [Applicants Ex. 7].

As set forth in the record, T-Mobile assigned its lease with the Town for the proposed flagpole to SectorSite. Based on the terms of the lease, which were negotiated with the Town and vetted locally through the C.G.S. §8-24 process in 2005 and 2006, a flagpole with an American flag is the required design by the Town, as the property owner, for visual mitigation. [Applicants Ex. 1, Attachment 9; Applicants Ex. 3]. Given that the site is improved with the town fire department and golf course and the Town's experience with the flagpole facility at its wastewater treatment facility, the flagpole design was considered appropriate for this site. When the lease was assigned to SectorSite, SectorSite reached out to the Town Planner and Town Manager to explore alternative facility designs. SectorSite was advised by the Town, as the property owner, that only the flagpole design was acceptable to the Town per the terms of the lease. [Applicants Ex. 1, pg. 20, Attachment 9; 2/22/18 Transcript pg. 49-50]. The lease also includes specific instructions regarding the maintenance of the flagpole and designates responsibility for proper flag etiquette to the Town to ensure that a flag is flown on the facility. [Applicants Ex. 3]. Clearly, the Town, as the property owner and lessor, determined that the flagpole design with a flag is a critical lease term as one of the benefits of the Town.

Potential Impacts to the Natural Environment

Impacts to the natural environment from the proposed facility are minimal.

a. Wetlands, Watercourses, and Floodplains

The proposed flagpole facility site is located within an area determined to be outside of the 0.2% annual chance floodplain (500-year flood zone) and as such, is not located within a flood hazard zone. [Applicants Ex. 1, A4].

Mr. Dean Gustafson, Professional Soil Scientist, Senior Wetlands Scientist and Environmental Consultant, testified that based on his field review, the nearest wetland to the proposed facility site is approximately 600 feet to the southeast. Mr. Gustafson confirmed that any wetland soils that were identified in 2006 no longer exhibit wetland characteristics. [2/22/18 Transcript, pg. 70-76]. Given that the drainage from the site parking lot connects to a closed drain system on Westwoods Drive that discharges to the stream located across the golf course into Scott Swamp Brook, the Applicants will install silt sock protection during construction to avoid siltation to Scott Swamp Brook. [2/22/18 Transcript, pg. 76-77].

Thus, the proposed flagpole facility will not have any impact to wetlands or watercourses.

b. Wildlife

Natural diversity NDDDB mapping for the area identified two species of state special concern: the spotted turtle (*Clemmys guttate*) and the eastern box turtle (*Terrapene carolina carolina*). As detailed in the drawings included in the Application, SectorSite will implement the best management practices for protection of these species in accordance with the plan specified by DEEP. [Applicants Ex. 1, pg. 14, Attachment 3]. Mr. Gustafson confirmed that the proposed site is not located within a primary or secondary conservation area per the Farmington Valley Biodiversity Project Map. [2/22/18 Transcript, pg. 106].

Mr. Gustafson testified that based on studies, concerns regarding impacts to bats from wind turbines are not applicable to the proposed facility because the wind turbine impacts result from percussion and waves created by wind turbines, not direct tower strikes. Since the proposed flagpole facility will not create these waves, no impacts to bats are anticipated. [2/22/18 Transcript, pg. 62]. Mr. Gustafson also testified that no impacts to birds are anticipated based on operational experience of the existing flagpole facility located at the Town's wastewater treatment facility, which has been operational for approximately 10 years. Mr. Gustafson consulted with the Town and the T-Mobile technicians that service this existing flagpole facility at the wastewater treatment facility and there were no reported bird strikes. [2/22/18 Transcript, pg. 61-62].

No other wildlife issues were identified and as such it is respectfully submitted that the proposed facility will not significantly impact wildlife or any ecological balance in this area of Farmington.

c. Agricultural

The Town-owned site is not part of any land purchased by the Connecticut Department of Agriculture purchased as part of their farmland protection program. In addition, since the site is Town-owned, it is not part of the Public Act 490 tax incentive program. Moreover, the Town-owned site does not contain any Connecticut Prime Farmland and/or important Agricultural Soils. While the proposed flagpole facility site will remove approximately 0.07 acres of corn crop production, this area represents only 0.7% of agricultural loss from the ± 10-acre corn field. Thus, the proposed facility is considered a de minimus loss of agricultural production. [Applicants Ex. 4, A.12, A.13, A.14; Applicants Ex. 7].



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Other Environmental Considerations

There are no other relevant or disputed environmental factors for consideration by the Council in this Docket. The flagpole facility will comply with all public health and safety requirements. A noise analysis confirms that the proposed facility will comply with all applicable noise thresholds. [Applicants Ex. 4 A.18, Attachment 3]. T-Mobile's facility will be equipped with emergency back-up power and SectorSite agreed to utilize a shared generator for two or more carrier tenants. [Applicants Ex. 1, Attachment 3; Applicants Ex. 4, A.34, A.35, Attachment 3; 2/22/18 Transcript pg. 106-107]. Additionally, since the facility is unmanned with few vehicle trips, there will be no impacts to traffic or air and the facility requires no freshwater nor does it produce any wastewater. As such, the Council should find and determine that the facility has few if any environmental effects.

Conclusion

The record before the Council demonstrates a public need for the facility by T-Mobile, and Verizon indicated a future need. No competent evidence challenging the public's need for the tower to provide reliable wireless services is contained in the record. The record also demonstrates a lack of any significant adverse environmental effects associated with the proposed flagpole facility.

Accordingly, for the reasons set forth herein and as more fully evidenced by the record in this Docket, a Certificate should be issued for the proposed facility.

Very truly yours,

A handwritten signature in blue ink that reads 'Lucia Chiochio'.

Lucia Chiochio

cc: SectorSite
T-Mobile
Service List