#### CONNECTICUT SITING COUNCIL

PETITION OF NEW CINGULAR	)	
WIRELESS PCS, LLC ("AT&T") TO THE	)	
CONNECTICUT SITING COUNCIL FOR A	)	PETITION NO
DECLARATORY RULING THAT NO	)	
CERTIFICATE OF ENVIRONMENTAL	)	<b>OCTOBER 4, 2011</b>
COMPATIBILITY AND PUBLIC NEED IS	)	
REQUIRED FOR THE PROPOSED	)	
INSTALLATION OF AN CONCEALED	)	
TOWER ON A WATER TANK AND	)	
RELATED FACILITIES LOCATED AT A	)	
WATER TREATMENT PLANT AT	)	
455 VALLEY ROAD	)	
GREENWICH, CONNECTICUT	•	

PETITION FOR A DECLARATORY RULING TO
INSTALL A CONCEALED TOWER ON A WATER TANK AND CONSTRUCT
ASSOCIATED EQUIPMENT AT A WATER TREATMENT PLANT
455 VALLEY ROAD, GREENWICH CONNECTICUT

#### I. Introduction

New Cingular Wireless PCS, LLC ("AT&T"), the "Petitioner", hereby petitions the Connecticut Siting Council ("Council") pursuant to Sections 16-50j-38 and 16-50j-39 of the Regulations of Connecticut State Agencies ("R.C.S.A.") for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required pursuant to Section 16-50k of the Connecticut General Statutes ("C.G.S.") for the proposed installation of a concealed tower facility on top of an existing water tank and other equipment located at grade at an Aquarion Water Company plant located in the Cos Cob area of the Town of Greenwich Connecticut.

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C&F: 1742810.2

#### II. The Existing Aquarion Water Treatment Facility

The property consists of a 2.63 acre parcel of land located at 455 Valley Road in the Town of Greenwich which is owned by Aquarion Water Company of Connecticut. The parcel abuts the Mianus River and is used and operated as a water treatment plant. The existing facilities were initially developed in 1954 and the parcel is currently improved with several structures including equipment and control buildings, garages, filtration tanks, and a water supply tank. The water tank is a cylindrical steel structure 30' in diameter with a domed top that extends to an overall height of 46' 6" AGL (51' to top of existing vent). The water tank is dark green in color and screened from adjacent properties by natural vegetation and a few evergreens that appear to have been planted at the time of initial construction of the water tank. The parcel is identified on the USGS map and an aerial photograph of the area which are annexed hereto in Exhibit A.

#### III. AT&T's Concealed Tower Facility & Associated Equipment

AT&T is licensed by the Federal Communications Commission ("FCC") to provide wireless services in this area of the State of Connecticut. AT&T proposes to construct a tower structure on top of the water tank, the first portion of which would extend the full circumference of the water tank to an overall height of 49' AGL, and then consist of a cylindrical structure 15' in diameter extending to an overall height of 64' AGL. The entire steel tower structure would be concealed with fiberglass panels and painted to match the existing water tank. Up to twelve (12) panel antennas and other associated equipment would be installed within the concealed tower structure with antennas at a centerline height of 60' AGL. A 10' x 15' equipment shelter is proposed adjacent to the water tank and would have a pitched roof and brick like exterior to be

consistent with other existing structures on the parcel. While the project involves a tower, it would appear to the general public simply as a 17' 6" extension of the water tank itself with a new small pump house located adjacent thereto. Included as Exhibit B are detailed construction drawings prepared by Clough Harbour & Associates LLP, (CHA) which include an abutters map, site access map, compound plan and tower elevation. Also annexed as Exhibit B is a structural report dated September 14, 2011 also prepared by CHA noting that the existing water tank can support the AT&T tower and proposed loading.

#### IV. The Proposed Facility is a Tower Under the Siting Council's Exclusive Jurisdiction

The Siting Council has exclusive jurisdiction over "such telecommunication towers, including associated telecommunications equipment, owned or operated by the state, a public service company or a certified telecommunications provider or used in a cellular system, as defined in the Code of Federal Regulations Title 47, Part 22." C.G.S. § 16-50i(6). State regulations specifically define a "tower" as "a structure, whether free standing or **attached to a building or another structure**, that has a height greater than its diameter and that is high relative to its surroundings". R.C.S.A. § 16-50j-21(q) (emphasis added). Associated equipment is further defined to mean "any building, structure, antenna, satellite dish, or technological equipment, including equipment intended for sending or receiving signals to or from satellites, that is an integral part of the operation of a community antenna television tower or telecommunications tower." R.C.S.A. § 16-50j-21(a).

AT&T's facilities are used in a "cellular system" as that term is defined in FCC regulations and as interpreted by the Siting Council. In this case, AT&T's proposed tower

facility involves a structure attached to a water tank, the structure is slightly taller than it is in diameter and the structure is high relative to its surroundings. As such, the proposed facility constitutes a tower with associated equipment that is regulated by the Siting Council as a matter of Connecticut State law.

There are several prior decisions by the Siting Council that are of precedential value in interpreting what constitutes a "tower" for purposes of Connecticut State law. See e.g. Petitions No. 343, 581 and TS-AT&T/NEXTEL-103-991022. In fact, the Council has routinely determined that typical lattice tower structures on rooftops, water tanks or even rebuilt silos are "tower" facilities for purposes of its jurisdiction. Thus, the question for the Council as presented in this Petition is whether or not this "tower facility" presents any significant adverse environmental effects that would require a full Certificate proceeding.

Of note, the existing water tank is simply too low in height for AT&T to attach antennas to it and provide meaningful service to the area. Additionally, AT&T has sought to avoid the impacts of a new ground mounted tower structure in this area of Greenwich which would be proposed at a substantially higher elevation in order to provide substantially more coverage in AT&T's network. As such, this Petition presents a unique set of facts where AT&T has of its own volition sought to use an existing structure and install a modest tower on it in order to provide more reliable services to what is a distinctly residential area of Greenwich and Stamford. For the reasons more fully set forth herein, AT&T petitions the Council to find that there are no such environmental effects and that a declaratory ruling determining that a Certificate is not required for this tower facility as proposed by AT&T.

# V. <u>The Concealed Tower and Associated Equipment Will Not Have a Substantial</u> Adverse Environmental Effect

A comparison of existing and proposed conditions reveals no substantial adverse environmental impacts associated with AT&T's proposed facility.

#### A. Visibility

As demonstrated in the visual materials included in Exhibit C, the proposed AT&T facility will be barely noticeable in this residential area of Greenwich. The overall increase in height is just under 18' above the dome of the existing water tank and only to a height of 64' AGL. At the location of the existing water tank, this increase in height is essentially at the height of the average tree canopy in the area. The facility will not be visible from any historic properties, parks, or schools and there are no designated scenic roads in the study area. Year round views of the top of the facility are limited to 19 residential properties in the immediate area. Moreover, as shown in the photosimulations, the facility will be extremely difficult to discern from these properties given relative elevation, color, design and existing tree cover in the area. As such, AT&T respectfully submits that the added visibility of the tower on top of the water tank is not significant for purposes of the Council's environmental considerations.

#### B. Minimal Physical Impact

AT&T's proposed ground mounted equipment shelter will have a brick appearance and a pitched roof and be located in an already cleared area adjacent to the existing water tank. No new access drives are proposed as part of the project. On site utilities will be upgraded as needed from CL&P pole #6468 which is immediately adjacent to the proposed equipment shelter. Annexed hereto as Exhibit D is a tree inventory letter dated August 4, 2011, prepared by

Clough Harbour & Associates LLP, (CHA) noting no trees with a diameter of 6" or larger need to be removed for construction of the facility. As such there are significant physical impacts associated with the facility.

#### C. Wetlands

As indicated in the Wetlands Delineation Report dated August 15, 2011, and prepared by Vanasse Hangen Brustlin, Inc, (VHB) included hereto as Exhibit E, the parcel abuts the Mianus River. The edge of the river and associated wetlands are well defined and delineated and there is a significant paved area and buildings extending to the river's edge along with a dam forming the Mill Pond. The AT&T project is located approximately fifty (50) feet further away from these existing developed areas along the river's edge and which make up part of Aquarion's waste and water treatment plant. All appropriate sediment and erosion control measures will be designed and employed in accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation during construction. Based on the foregoing, AT&T submits there will be no impacts to the Mianus River and associated wetlands as part of AT&T's tower facility and associated equipment.

#### D. Compliance with MPE Limits

The operation of AT&T's antennas will not increase the total radio frequency electromagnetic power density at the site to a level at or above the applicable standards. A detailed power density report prepared by C Squared Systems, LLC is included as part of Exhibit F. The total radio frequency power density will be well within standards adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes and the MPE limits established by the Federal Communications Commission.

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C&F: 1742810.2

#### VI. Public Need

Annexed hereto in Exhibit G are AT&T radio frequency coverage plots which depict existing and proposed coverage from the site at 60' AGL. As demonstrated therein, AT&T currently has gaps in reliable service in these areas of Cos Cob and Stamford and the proposed facility is needed to fill some of these existing coverage gaps within AT&T's network.

Specifically, coverage improvements are anticipated along Valley Road, Westover Road,

Palmers Hill Road and residences in this area of Greenwich and Stamford. While the Council does not have to find a public need for the facility as part of a ruling on this Petition, it is respectfully submitted that the enclosed information fully demonstrates the need for the installation of this facility in providing reliable wireless services to the public. Indeed, AT&T has attempted to balance the need for service improvements in the area with the overall height of any new facility and respectfully submits that any other alternative would involve a substantially taller tower in order to provide reliable service to the public.

#### VII. Conclusion

As more fully set forth in this Petition, the proposed AT&T tower and associated equipment at Aquarion's water treatment facility are wholly consistent with legislative findings outlined in Section 16-50g and 16-50aa of the General Statutes of Connecticut that seek to avoid the unnecessary proliferation of towers in the State. Further, there are no known adverse environmental effects associated with the project. As such and for all the foregoing reasons, AT&T petitions the Connecticut Siting Council for a determination that the proposed facility does not require a Certificate of Environmental Compatibility and Public Need and that the Council issue an order approving same.

Respectfully Submitted,

Christopher B. Fisher, Esq. Cuddy & Feder, LLP 445 Hamilton Avenue, 14<sup>th</sup> Floor

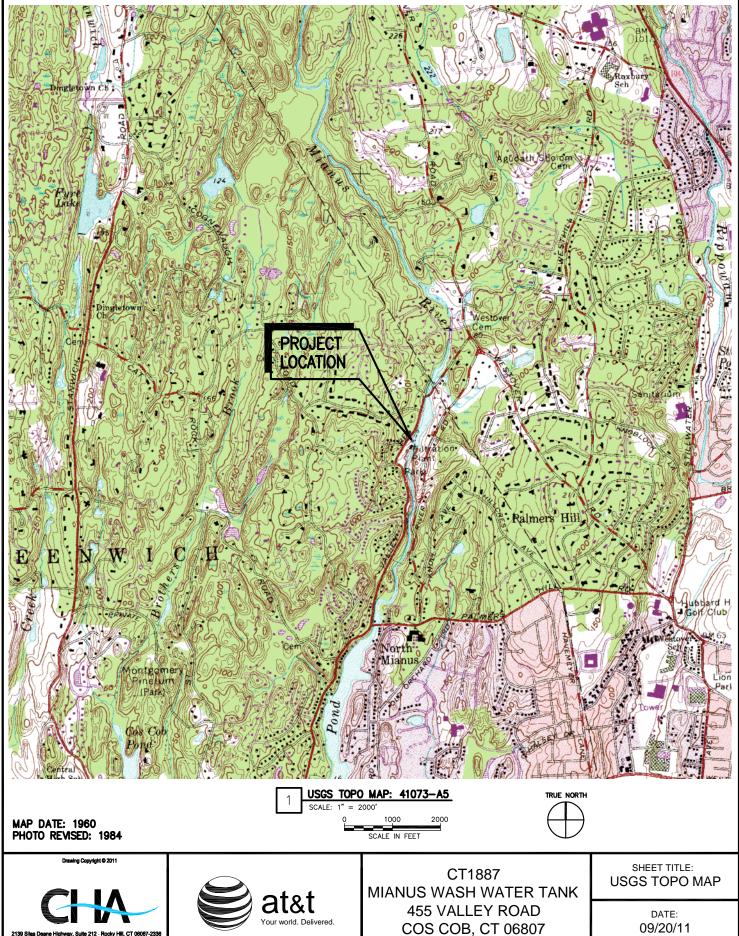
White Plains, New York 10601 (914) 761-1300

Attorneys for and on behalf of

Petitioner AT&T

cc: First Selectman Peter Tesei, Town of Greenwich Katie Blankley, Assistant Town Planner, Town of Greenwich Liz Camerino Schultz, Aquarion Michele Briggs, AT&T

#### Exhibit A



FILE: W:\SAI CINGULAR\18301\SITES\1077 GREENWICH 1887\ZD\GREENWICH-5 USGS.DWG

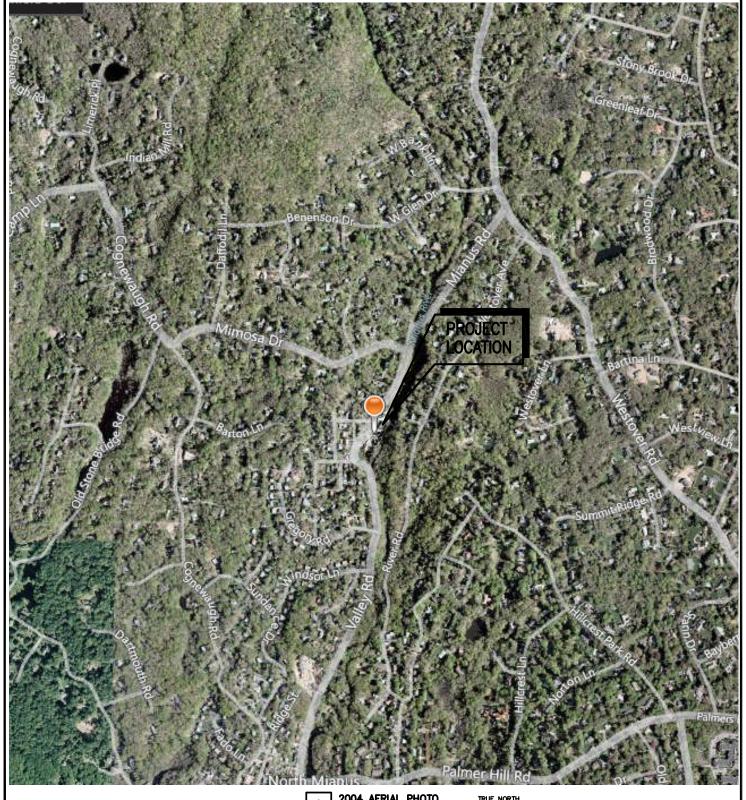
NEW CINGULAR WIRELESS PCS, LLC 500 ENTERPRISE DRIVE, ROCKY HILL, CT 06067

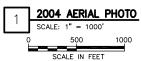
09/20/11

FAIRFIELD COUNTY

CHA PROJ. NO. - 18301-1077-43000

REVISION:







Drawing Copyright © 2011





NEW CINGULAR WIRELESS PCS, LLC 500 ENTERPRISE DRIVE, ROCKY HILL, CT 06067 CT1887 MIANUS WASH WATER TANK 455 VALLEY ROAD COS COB, CT 06807 FAIRFIELD COUNTY

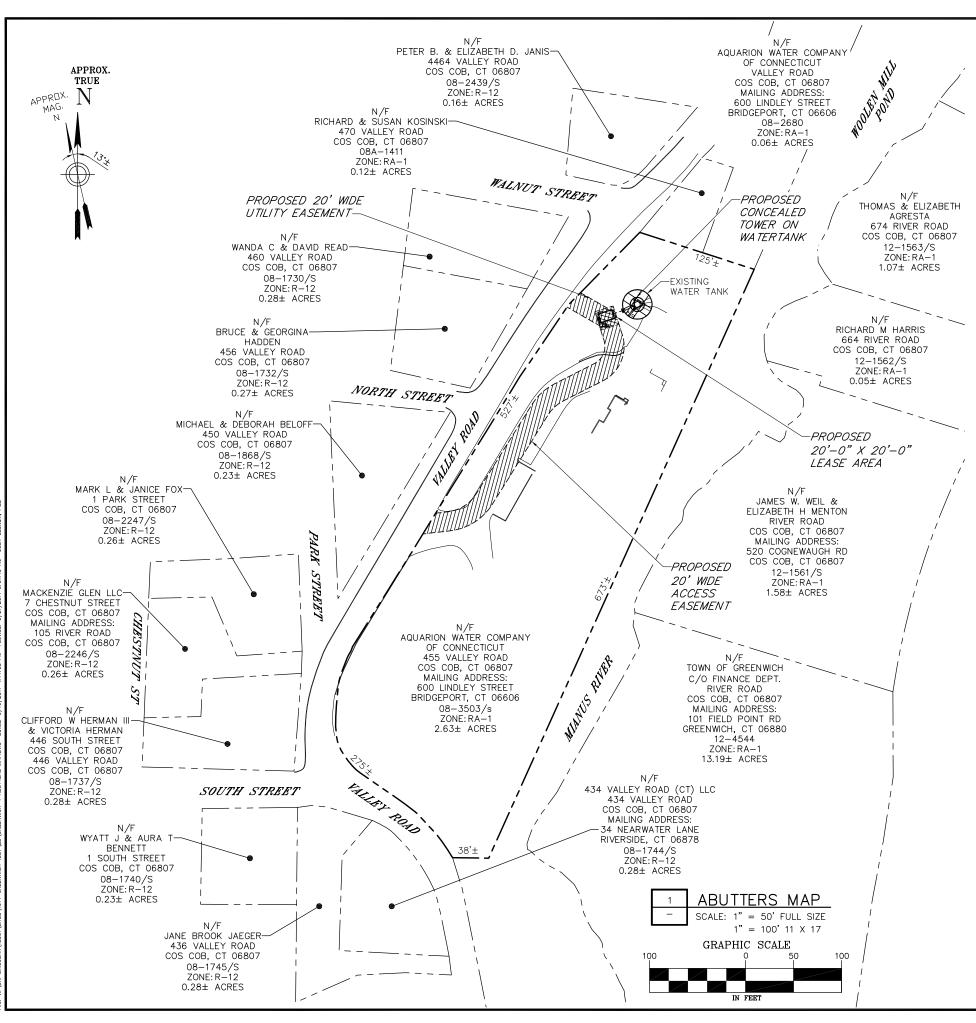
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SHEET TITLE:
AERIAL PHOTO

DATE: 09/20/11

REVISION:

#### Exhibit B





NEW CINGULAR WIRELESS PCS, LLC 500 ENTERPRISE DRIVE ROCKY HILL, CT 06067

Drawing Copyright @ 2011



CHA PROJECT NO: 18301 - 1077 - 43000

NO.	SUBMITTAL		
_	09/20/11 ISSUED FOR CSC CERTIFICATE		SC CERTIFICATE
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IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTIO OF A LICENSED PROFESSIONAL ENGINEER,

SITE ID:
CT1887
SITE NAME:
MIANUS WASH
WATER TANK
SITE ADDRESS:
455 VALLEY ROAD
COS COB, CT
06807
FAIRFIELD COUNTY

ABUTTERS MAP

SHEET NUMBER

C01

2. PROPERTY LINE SHOWN HEREON ARE FROM RECORD DEEDS PLOTS AND/OR TAX MAPS AS OVERLAID ON ANY MONUMENTATION OR OTHER EVIDENCE THAT MAY HAVE BEEN LOCATED DURING THE TOPOGRAPHIC SURVEY. A PROPERTY SURVEY WAS NOT PERFORMED BY CHA AND AS A RESULT THE PROPERTY LINES SHOWN ARE APPROXIMATE AND DO NOT PRESENT A PROPERTY/BOUNDARY OPINION.

3. BASE MAPPING PREPARED BY CHA FROM AN JULY 2011 FIELD SURVEY.

1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-300b-1 THROUGH 20-300b-20 AND THE "STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF

CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND

VERTICAL CLASS V-2

TOPOGRAPHIC CLASS T-2

CHANGE AS AN ACCURATE FIELD SURVEY MAY DISCLOSE.

TYPE OF SURVEY: COMPILATION PLAN

BOUNDARY DETERMINATION CATEGORY: NONE

CLASS OF ACCURACY: HORIZONTAL CLASS A-2

SURVEYORS INC. ON SEPTEMBER 26, 1996. THE BOUNDARY LINES SHOWN ON

THIS PLAN WERE COMPILED FROM OTHER MAPS, RECORD RESEARCH OR OTHER SOURCES OF INFORMATION. IT IS NOT TO BE CONSTRUED AS HAVING BEEN OBTAINED AS THE RESULT OF A FIELD SURVEY, AND IS SUBJECT TO SUCH

4. NORTH ORIENTATION IS TRUE NORTH BASED ON GPS OBSERVATIONS TAKEN AT THE TIME OF THE FIELD SURVEY.

5. UNDERGROUND UTILITIES, STRUCTURES AND FACILITIES HAVE BEEN SHOWN FROM SURFACE LOCATIONS AND MEASUREMENTS OBTAINED FROM A FIELD SURVEY, THEREFORE THEIR LOCATIONS MUST BE CONSIDERED APPROXIMATE ONLY. THERE MAY BE OTHER UTILITIES WHICH THE EXISTENCE OF ARE NOT KNOWN. SIZE, TYPE AND LOCATION OF ALL UTILITIES AND STRUCTURES MUST BE VERIFIED BY PROPER AUTHORITIES PRIOR TO ANY AND ALL CONSTRUCTION. CALL DIG SAFE PRIOR.

6. SUBJECT TO ANY STATEMENT OF FACTS THAT AN UP-TO-DATE ABSTRACT OF TITLE WOULD DISCLOSE.

7. SUBJECT TO ALL RIGHTS, EASEMENTS, COVENANTS OR RESTRICTIONS OF RECORD.

8. LATITUDE/LONGITUDE/ELEVATIONS WERE OBTAINED BY GPS OBSERVATIONS. LATITUDE/LONGITUDE ARE REFERENCED TO NAD83 CONNECTICUT ZONE. COORDINATES SHOWN, IF ANY, ARE EXPRESSED IN U.S. SURVEY FEET. ELEVATIONS ARE REFERENCED TO NAVD88. TOP OF STRUCTURE HEIGHT AS SHOWN, IF ANY, DETERMINED BY VERTICAL ANGLE OR BY ACTUAL LOCATION. INFORMATION SHOWN BASED ON FAA 1A CERTIFICATION ACCURACY LEVEL DEFINED AS;

HORIZONTAL: ±20 FEET / 6 METERS VERTICAL: ±3 FEET / 1 METERS

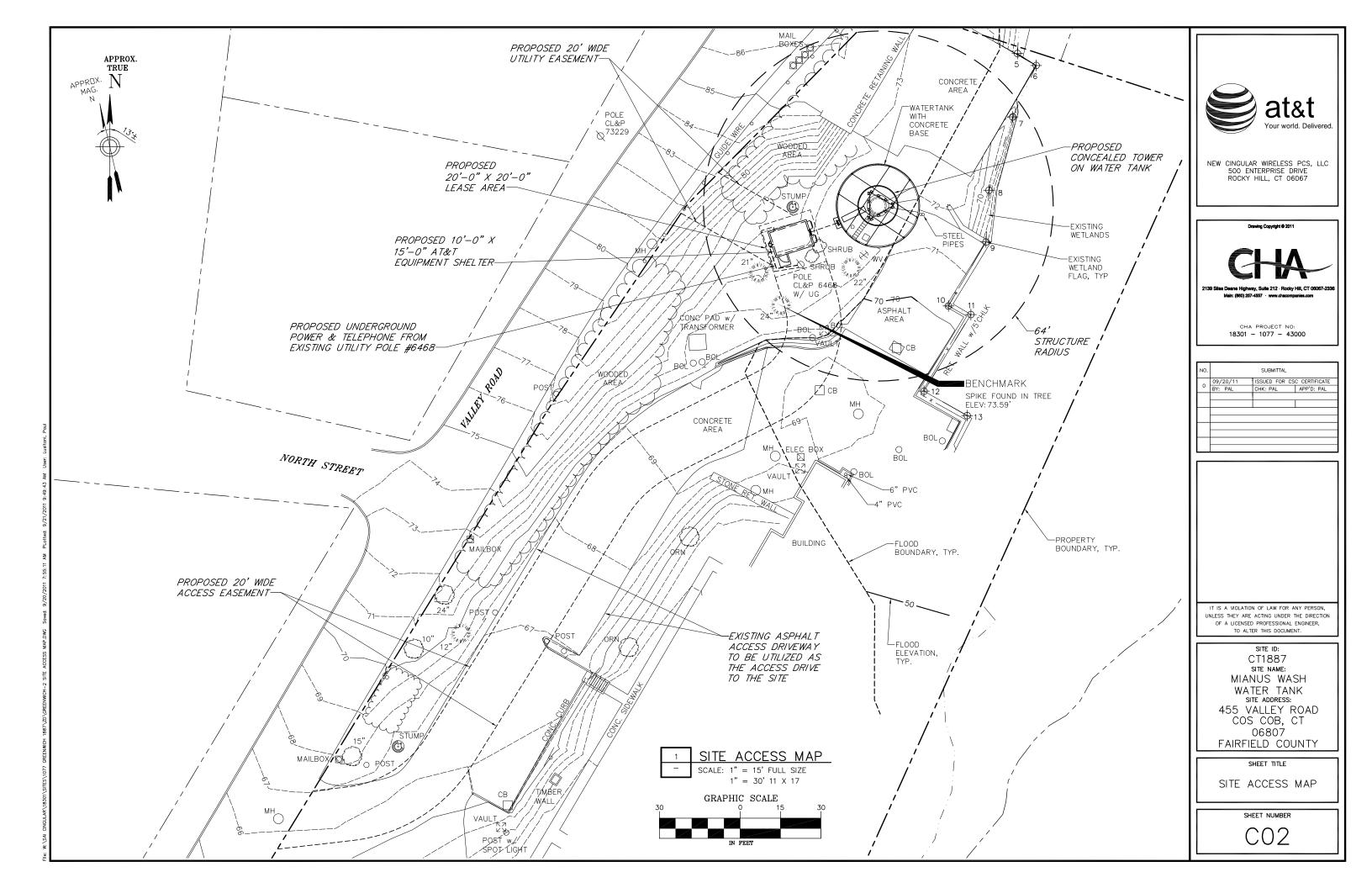
9. SITE FALLS WITHIN ZONE "X" DEFINED AS AREAS DETERMINED TO BE OUTSIDE 500—YEAR FLOOD PLAIN AS SHOWN ON FLOOD INSURANCE RATE MAP, TOWN OF GREENWICH, CONNECTICUT, FAIRFIELD COUNTY, PANEL 14 OF 28, COMMUNITY PANEL NUMBER 090008 0014 C, REVISED FEBRUARY 22, 1999.

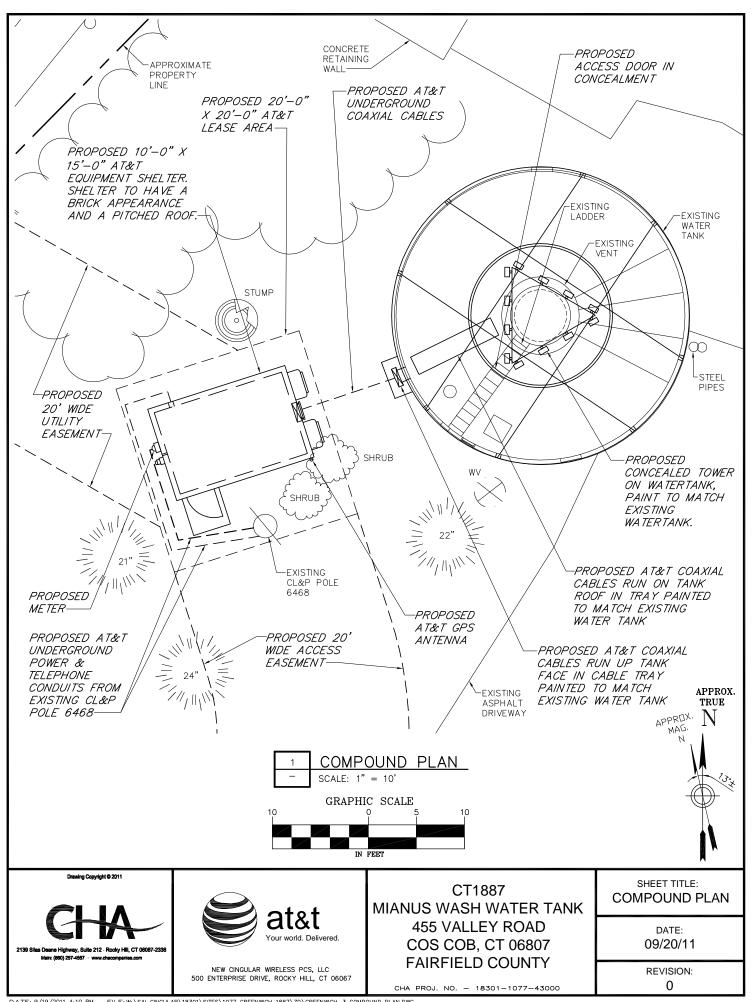
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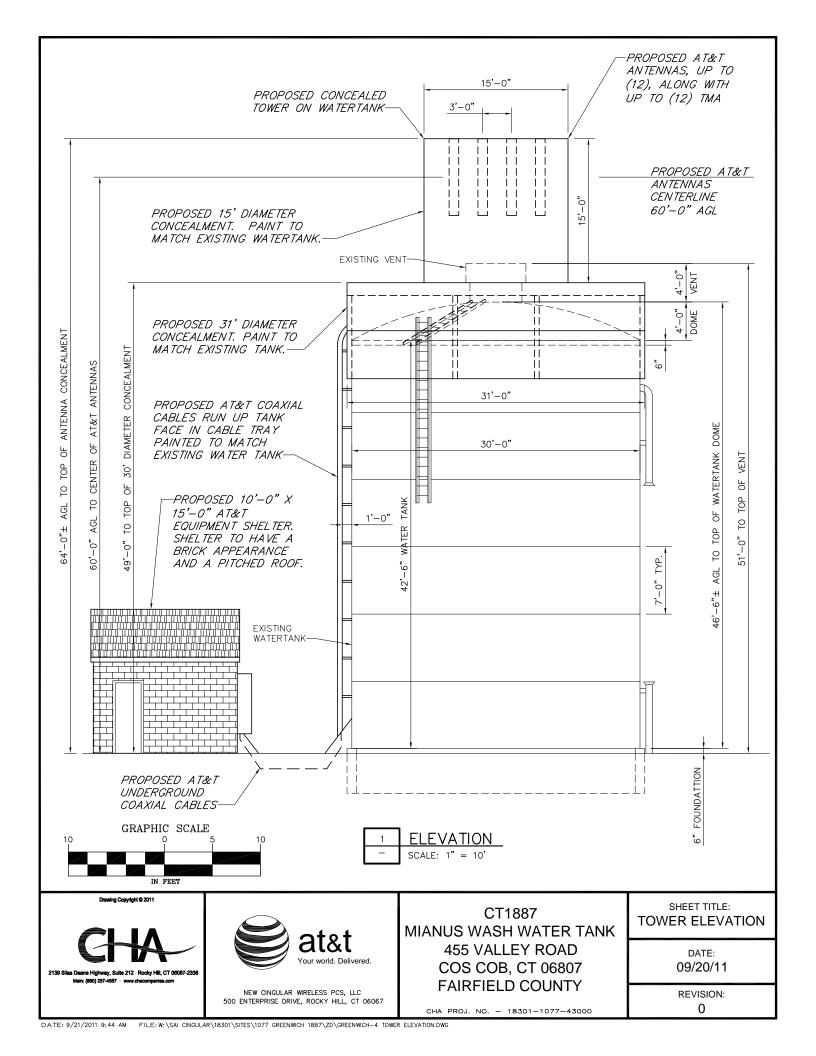
SURVEY NOTES:

1. MAP ENTITLED "IMPROVEMENT LOCATION SURVEY AND COMPILED PROPERTY LINE SURVEY— VALLEY ROAD GREENWICH, CONNECTICUT, PREPARED FOR TIGHE & BOND" AS PREPARED BY CHAS. H. SELLS, INC., DATED DECEMBER 28, 2005.

2. TOWN OF GREENWICH TAX MAPS 400, 401 & 402 VOL5.









#### September 14, 2011

New Cingular Wireless PCS, LLC 500 Enterprise Drive Rocky Hill, CT 06067

RE: Structural Analysis of the Aquarian Water Tank (CT1887) – Antenna Enclosure Allowances Located in Fairfield County, CT CHA Project No. 18301-1077-28000

To whom it may concern:

CHA has performed an overturning moment analysis of the referenced water tank for the purpose of evaluating its ability to support existing loads in addition to new equipment loads within a fiberglass enclosure proposed by New Cingular Wireless. In summary, our analysis indicates that the water tank with its foundation weight are structurally capable of resisting the overturning moment due to existing and proposed loads, given the following maximum allowed enclosure dimensions:

Option 1 – 9'-0" x 9'-0" square enclosure, allowing antennas to be mounted at a centerline elevation of 60'-0" AGL. Option 2 – 15'-0" diameter circular enclosure, with antennas mounted at a centerline elevation of 60'-0" AGL.

Our analysis is based on the following information:

- Original water tank drawings and foundation information obtained from design drawings by American Water Works Service Company, Inc., dated September 24, 1953.
- Proposed and existing equipment information, including antenna models and elevations, obtained from New Cingular Wireless dated July 11, 2011.
- Water tank field investigation information obtained from NE Towers, dated August 10, 2011.
- Previous analysis by CHA, dated August 29, 2011.

Our analysis includes data for the following proposed equipment and cables:

#### 1- New Cingular Wireless

Twelve (12) Powerwave P65-17-XLH-RR panel antennas mounted within a fiberglass enclosure, at a centerline elevation of 60' AGL, with eighteen (18) 1-5/8" coaxial cables.

- Six (6) Remote Radio Units mounted to the new fiberglass enclosure at a centerline elevation of 60' AGL.
- Six (6) Powerwave TT19-08BP111-001 TMA's mounted within the new fiberglass enclosure at a centerline elevation of 60' AGL.
- One (1) Raycap DC-48-60-18-8F Surge Arrestor
- Two (2) DC Power Cables and one (1) 5/8" Fiber Cable in a 3" innerduct.

With this information and ANSI/TIA/EIA-222-F, *Structural Standards for Steel Antenna Towers and Antenna Supporting Structures*, as well as ANSI/AWWA, *American Water Works Association Standards* - D100-05 with FM approvals dated May 2011, the analysis was performed to verify the adequacy of the tank to resist overturning due to the increase wind areas on the tank. A plate analysis of the tank walls to determine their adequacy to support loads due to the proposed enclosure, under load combinations due to wind, has not been performed. Per the AWWA standard, wind speed considered in the analysis is 100 mph, which coincides with the wind speed for Greenwich County per the 2005 CT Supplement to the Building Code. Based on the data provided, applicable wind loads were calculated. These wind loads were then applied to the existing structure with the proposed wall extension.

The analysis indicates that the existing water tank <u>is</u> capable of supporting the existing and proposed loads, under the given maximum dimensions for the two (2) options, listed on page 1. The proposed fiberglass enclosure top of wall height is 64' AGL, which is 21'-6" above the top of existing tank wall elevation. The fiberglass enclosure will be supported on a steel frame that will be connected to the existing water tank walls. This configuration allows the existing tank to meet the overturning moment Safety Factor of 2.0. The fiberglass enclosure is required to be supported by a steel framed platform, in order to transfer loads from the enclosure to the tank walls, rather than the tank roof.

CHA was not provided original tank base reactions for the foundation. A foundation analysis has not been performed in order to determine its adequacy for supporting the proposed loads in addition to the existing loads.

If you have any questions, or if we can be of further assistance, please do not hesitate to call.

Very truly yours,

Thomas L. O'Brien, P.E.

Partner



#### CHA COMPUTATION PAD

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48'-6" - 50'-0": Prino \* AREA = 38.8 psf \* (14' with \* 1,3') = 0.81 K

50' - 64'-0": Prino \* AREA = 45.2 psf \* (14' × 14') = 8.86 K

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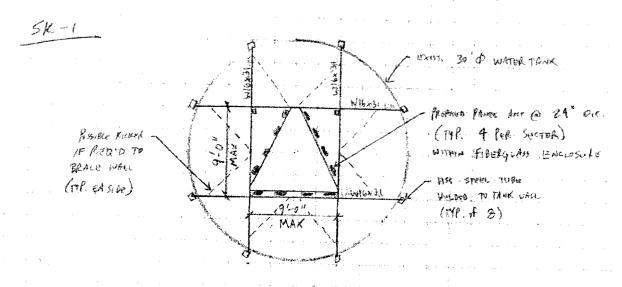
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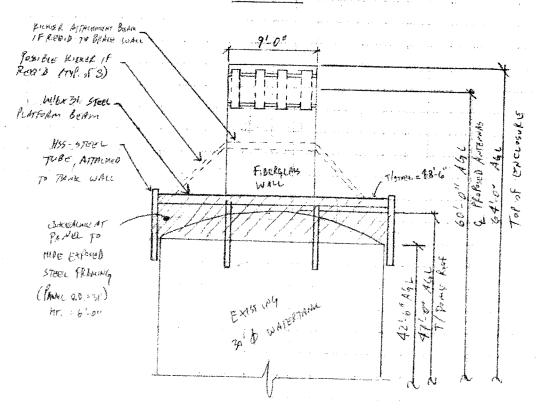
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### CHA COMPUTATION PAD

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PLAN VIEW



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#### CHA COMPUTATION PAD

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#### Exhibit C

## Visual Analysis Report

# CT1887 MIANUS WASH WATER TANK 455 VALLEY ROAD COS COB, CT 06807

CHA Project Number: 18301.1077.43000

Prepared for:

New Cingular Wireless PCS, LLC 500 Enterprise Drive Rocky Hill, CT 06067

Prepared by:



2139 Silas Deane Highway Rocky Hill, Connecticut 06067 (860) 257-4557

September 23, 2011 Rev. 0



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#### 1.0 INTRODUCTION

CHA conducted a visibility study for a proposed concealed tower to be positioned on top of an existing water tank located at 455 Valley Road, Cos Cob, CT. The proposed antennas are to be located at a centerline elevation of 60'-0" above ground level (AGL). The top of the existing water tank is about 47'-0" AGL, therefore, a vertical enclosure on top of the existing water tank is proposed to house the tower and will have an overall height of 64'-0" AGL. The purpose of the study was to determine the visual impact, if any, that the proposed concealed tower would have on the surrounding community within a two mile radius study area. Two techniques were utilized to determine the visual impact within the study area: a computer model using topography and vegetation as constraints to estimate the visual limits and a field analysis to verify the visual limits determined from the computer model. Research of the study area was also conducted to determine locations of sensitive visual receptors.

#### 2.0 COMPUTER MODEL VISUAL ANALYSIS

A computer model was developed using a proprietary AutoCAD-based application developed by our Technology Solutions Group to estimate how the surrounding topography and vegetation within a 2 mile radius may obstruct the extended water tank's visibility. The visibility calculations are completed using a digital elevation model (DEM), which is a model of the earth's surface represented by a grid of elevations from USGS topography maps. Each point in the DEM is independently tested for visibility based on the surrounding topography developed from the USGS maps. Once all points have been tested, a map is generated showing areas of visibility and areas screened by topography. Knowing which areas are screened by topography will assist in field determining which areas within the study area may have seasonal visibility. Next, vegetation within the study area is added to the map by digitizing it from 2004 aerial photographs. CHA's application utilizes a vegetation outline layer which is assigned the standard 65' height. A new map is generated showing only areas of visibility based on topography and the vegetation constraint. These visible areas will be verified during the field visual analysis.

#### 3.0 VISUAL RECEPTOR RESEARCH

Research of the surrounding study area was conducted to determine the locations of sensitive visual receptors such as historic sites, historic districts, schools, churches, cemeteries, parks, playgrounds, recreational areas, walking trails, beaches, scenic roads, scenic lands<sup>1</sup>, and heritage areas<sup>2</sup>. Historic sites and districts were determined from the National Register of Historic Places. State parks and walking trail systems were determined from the CTDEP and municipalities websites. Surrounding schools, churches, cemeteries, parks, playgrounds, recreational areas, and beaches were determined from street maps, internet searches, and available mapping from the municipal websites. Scenic roads were determined from the CTDOT list of designated scenic roads. Scenic lands were determined by contacting the CTDOT. Heritage Areas were determined from available information on individual heritage area websites and internet searches. All of the above sensitive visual receptors were added to the viewshed map.

#### 4.0 SITE AND STUDY AREA DESCRIPTION

The subject parcel is approximately 2.6 acres. The parcel houses an existing water tank, Water Company building, and associated parking and appurtenances. The existing water tank where the concealed tower is to

<sup>&</sup>lt;sup>1</sup> Scenic Lands acquired pursuant to Public Act No. 445 (February, 1965)

<sup>&</sup>lt;sup>2</sup> Connecticut Heritage Areas pursuant to Public Act No. 09-221 (July, 2009)

be located is in a low lying area at the north end of the parcel, adjacent to the Mianus River. The base of the water tank is at about +/-72' AMSL. The topography within the study area consists of hills ranging from 30' AMSL to 250' AMSL. The heavy vegetation and varied topography surrounding the proposed facility will act as a visual buffer to help screen the facility from the adjacent residential parcels. Additionally, the relatively low height (64'-0" AGL) will limit the structures visibility within the study area.

There are 5 historical sites, 14 parks/recreational areas, 14 schools, 3 cemeteries, and 10 churches within the study area. There are no designated scenic roads within the study area.

#### 5.0 FIELD VISUAL ANALYSIS

On August 23, 2011 a field visual analysis was conducted to verify the sensitive visual receptors and the limit of visibility determined from our research and computer model. Weather conditions were favorable on the date of the visibility study as it was a clear and sunny day with winds between 3 and 7 MPH; therefore, visibility of the balloon from surrounding areas was not affected. In general, the field visibility study was conducted as follows: A 40" diameter red balloon was flown at a height of 64'-0" above existing grade. Once the balloon was flown, CHA completed a field drive of the surrounding area to determine the visibility of the balloon, and thus the proposed concealed tower. Visibility from the sensitive visual receptors was our primary focus so photos were taken from each of these locations. Photos were also taken from major streets, intersections, and residential areas; from key areas where the balloon was visible; and from key areas where it was not visible. The limits of visibility determined from the computer model were field verified and adjusted as needed. Areas of potential seasonal visibility were field estimated and marked on the viewshed map. Finally, the number of residences within the seasonal and year round visible areas was determined.

#### 6.0 CONCLUSION

The results of our visual study are summarized in the following documents: Section 7.0: Visibility Summary Tables, Section 8.0: Viewshed Maps, and Section 9.0: Photosims. In conclusion, the year round visual impact to the surrounding community within a two mile radius is limited to the red hatched areas on the viewshed map, which is approximately 0.15%, or 12.16 acres, of the total study area. The proposed concealed tower will be seen year round by 19 residences within the study area. The proposed concealed tower will not be seen year round from any of the sensitive visual receptors listed on the viewshed map.

Immediately outside some of the limits of year round visibility, trees start to screen the proposed monopole giving the potential for seasonal views. The blue hatched areas on the viewshed map indicate the seasonal visual impact estimated during leaf on conditions, which is approximately 0.04%, or 3.48 acres, of the total study area. The proposed concealed tower will be seen seasonally from 6 residences within the study area. The proposed concealed toewr will not be seen seasonally from any of the sensitive visual receptors listed on the viewshed map.

The remainder of the two mile radius study area is screened by topography (5,967 acres, 74%) and vegetation (2,070 acres, 26%). Photos documenting the visible conditions described above have been included in the photo-simulations with their locations marked on the viewshed map.



7.0 VISIBILITY SUMMARY TABLES



	Visibility Summary by Photo Simulation Location					
View Number	Visibility	Location	Distance to Concealed Tower (ft / miles)	Nearby Residences with Views by Address	Nearby Visual Receptors with Views	
1	Year Round	Intersection of South Street and Valley Road	590 / 0.11	South Street: 1, # <sup>2</sup> Valley Road: 436, 434	None	
2	Seasonal <sup>1</sup>	Intersection of Valley Road and Park Street	380 / 0.07	Park Street: 1, 5	None	
3	Year Round	North Street	240 / 0.05	Valley Road: 450 North Street: 6	None	
4	Year Round	Valley Road	60 / 0.01	Valley Road: 456, 464, 460 North Street: 1, 2, 3 Walnut Street: # <sup>2</sup>	None	
5	Year Round	Intersection of North Street and Chestnut Street	530 / 0.10	North Street: 4 Chestnut Street: 16	None	
6	Seasonal <sup>1</sup>	Valley Road	620 / 0.12	Valley Road: 470, 480, 482, 484	None	
7	Year Round	River Road	400 / 0.08	River Road: # <sup>2</sup> , 664, 659, 674	None	
8	Nonvisible	Mianus River National Park	1,715 / 0.32	N/A	N/A	
9	Nonvisible	Mianus River Park Trails	2,480 / 0.47	N/A	N/A	
10	Nonvisible	Westover Elementary School	6,785 / 1.29	N/A	N/A	
11	Nonvisible	Scalzi Park and J.M. Wright Technical High School	9,160 / 1.73	N/A	N/A	
12	Nonvisible	Stillmeadow School	5,524 / 1.05	N/A	N/A	
13	Nonvisible	Roxbury School	8,450 / 1.60	N/A	N/A	
14	Nonvisible	Beth-El Cemetery	9,600 / 1.82	N/A	N/A	
15	Nonvisible	Fort Stamford	5,960 / 1.13	N/A	N/A	
16	Nonvisible	North Mianus School	3,910 / 0.74	N/A	N/A	
17	Nonvisible	Central Middle School	10,000 / 1.89	N/A	N/A	
18	Nonvisible	The Stanwich School	7,024 / 1.33	N/A	N/A	

<sup>&</sup>lt;sup>1</sup>Seasonal views were determined during leaf-on conditions. Extents are based on the computer model and field judgement, not observation.

<sup>&</sup>lt;sup>2</sup>Residence with visibility but no house/mailbox number found during field visit.

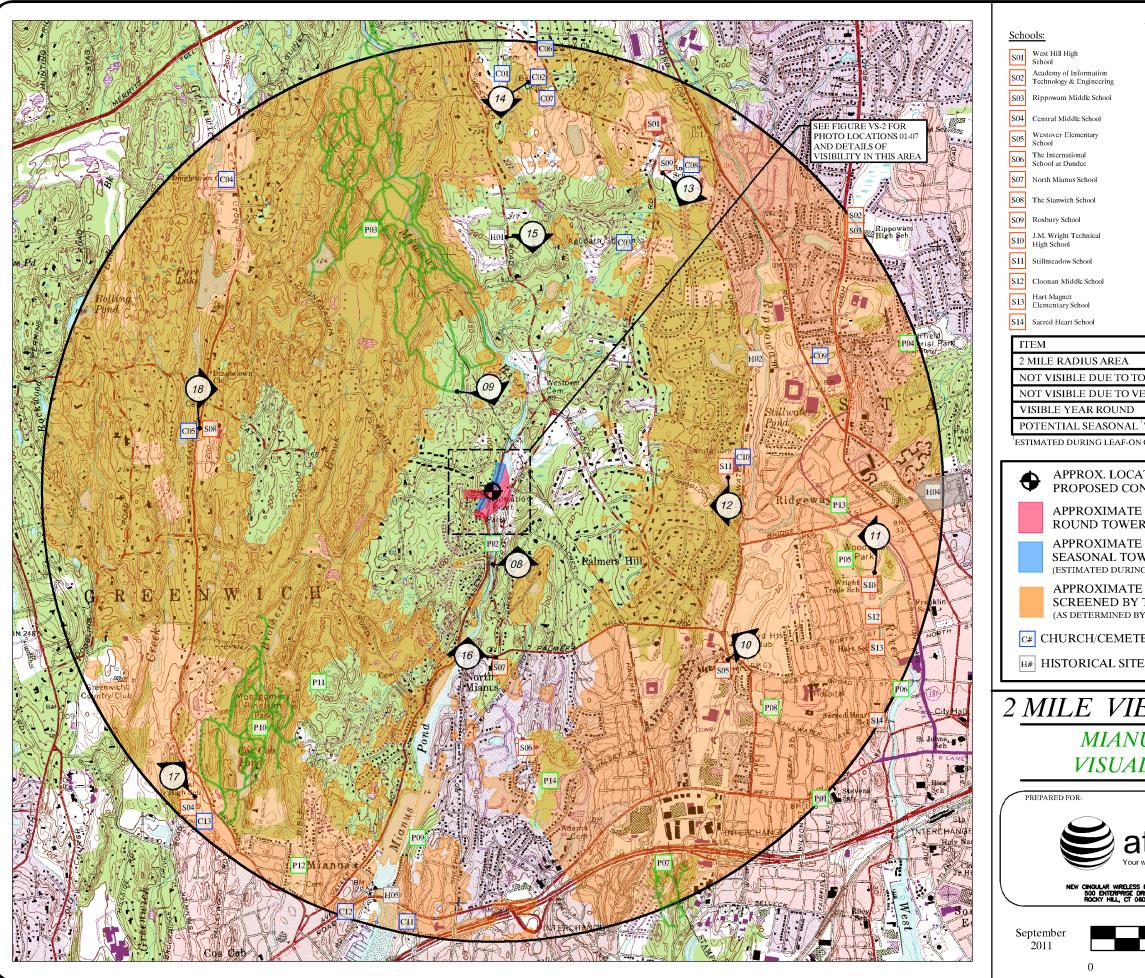


Visibility Summary by Street				
Street	Visibility	Residences with Views		Visibility Along Roadway
Street	Visibility	Addresses	Total	(ft)
Chestnut Street	Year Round	16	1	60
North Street	Year Round	1, 2, 3, 4, 6	5	370
Park Street	Seasonal <sup>1</sup>	1, 5	2	50
River Road	Year Round	# <sup>2</sup> , 664, 659, 674	4	260
South Street	Year Round	1, # <sup>2</sup> ,	2	100
Valley Road	Seasonal <sup>1</sup>	470, 480, 482, 484	4	290, 550
valicy Road	Year Round	434, 436, 450, 456, 460, 464	6	270, 380
Walnut Street	Year Round	# <sup>2</sup>	1	90

<sup>&</sup>lt;sup>1</sup>Seasonal views were determined during leaf-on conditions. Extents are based on the computer model and field judgement, not observation.

<sup>&</sup>lt;sup>2</sup>Residence with visibility but no house/mailbox number found during field visit.

8.0 VIEWSHED MAPS



#### Sensitive Visual Receptors

S01 West Hill High School

Academy of Information Technology & Engineering

Rippowam Middle School Central Middle School

The International School at Dundee North Mianus School

S08 The Stanwich School

Roxbury School J.M. Wright Technical

S12 Cloonan Middle School

S14 Sacred Heart School

#### Parks:

Park

P01 Hatch Field P08 Lione Park P02 Mianus River Natural Park

P03 Mianus River Park

P12 Bible Street Playground P06 Mill River Park P13 Vincent Horan Park P07 Rosa Hartman Park P14 Dundee Woods

Historic Sites:

H01 Fort Stamford

P04

H04 Revonah Manor Historic District H05 Samuel Ferris House H02 John Knap House

H03 Linden Apartments

#### Church/Cemetery:

C01 Roxbury Cemetery

C02 Beth-El Cemetery

Agudath Sholum C03 C04 Dingletown Church

C05 St. Agnes Rectory

C06 Roxbury Church C07 Temple Beth El

C08 St. Leo Catholic Church

C09 First United Methodist Church C10 Church of Jesus Christ of LDS

C11 St. Catherine of Sienna

C12 Diamond Hill United Methodist C13 Greenwich Baptist Church

#### Visibility by Acreage

ITEM	APPROXIMATE ACRES	% OF TOTAL AREA
2 MILE RADIUS AREA	8,053	100%
NOT VISIBLE DUE TO TOPOGRAPHY	5,967.27	74.10%
NOT VISIBLE DUE TO VEGETATION	2,070.09	25.71%
VISIBLE YEAR ROUND	12.16	0.15%
POTENTIAL SEASONAL VISIBILITY	3.48	0.04%

<sup>1</sup>ESTIMATED DURING LEAF-ON CONDITIONS

#### Legend

APPROX. LOCATION OF PROPOSED CONCEALED TOWER

APPROXIMATE LIMIT OF YEAR ROUND TOWER VISIBILITY

APPROXIMATE LIMIT OF SEASONAL TOWER VISIBILITY (ESTIMATED DURING LEAF-ON CONDITIONS)

APPROXIMATE LIMIT OF AREA

SCREENED BY TOPOGRAPHY (AS DETERMINED BY COMPUTER MODEL)

C# CHURCH/CEMETERY

P# PARK s# SCHOOL (SEASONAL VISIBILITY)

(NON-VISIBLE)

WALKING TRAIL

(YEAR ROUND VISIBILITY)

COMPUTER SIMULATION

PHOTOGRAPH LOCATION

COMPUTER SIMULATION PHOTOGRAPH LOCATION

COMPUTER SIMULATION

PHOTOGRAPH LOCATION

HISTORICAL DISTRICT

#### 2 MILE VIEWSHED ANALYSIS MAP

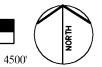
#### MIANUS WASH WATER TANK VISUAL IMPACT ASSESSMENT



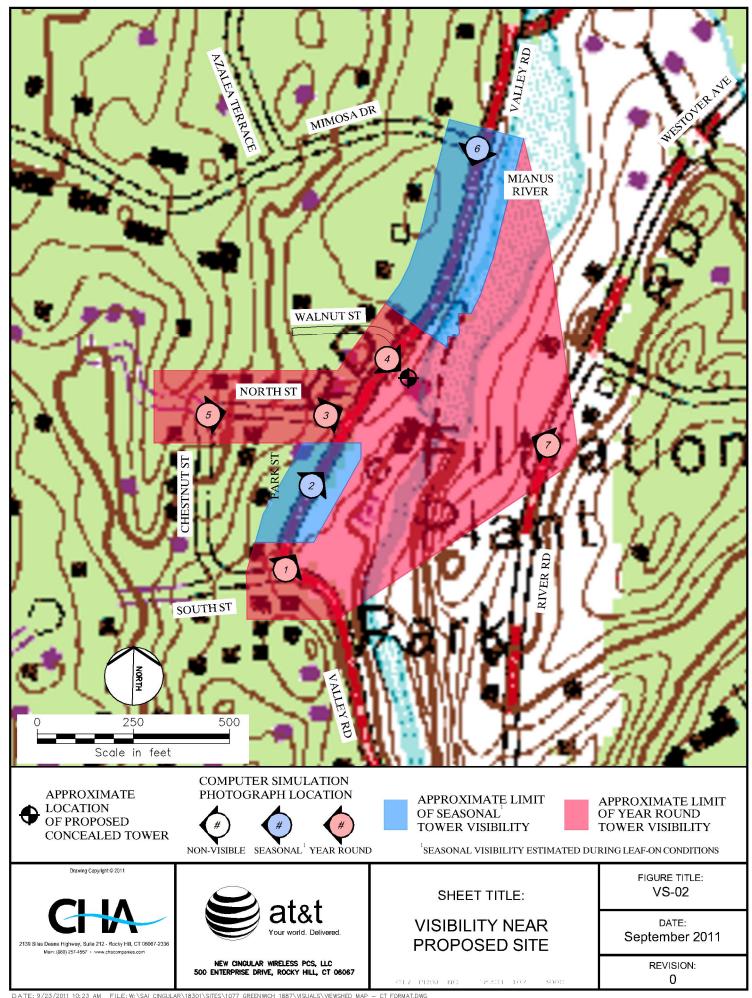
NEW CINGULAR WIRELESS PCS, ILC 500 ENTERPRISE DRIVE ROCKY HILL, CT 08067



September 2011 2250'



**FIGURE** VS-1



#### 9.0 PHOTOSIMS



Photosim for conceptual purposes only - actual antenna and equipment locations to be determined based on final engineering design



**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 1 - EXISTING VIEW FROM INTERSECTION OF SOUTH STREET AND VALLEY ROAD LOOKING NORTHEAST TOWARDS SITE



NEW CINGULAR WIRELESS PCS, LLC 500 ENTERPRISE DRIVE ROCKY HILL, CT 06067



Photosim for conceptual purposes only - actual antenna and equipment locations to be determined based on final engineering design



**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 1 - PROPSOED VIEW FROM INTERSECTION OF SOUTH STREET AND VALLEY ROAD LOOKING NORTHEAST TOWARDS SITE



NEW CINGULAR WIRELESS PCS, LLC 500 ENTERPRISE DRIVE ROCKY HILL, CT 06067





**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 2 - NON-VISIBLE VIEW FROM INTERSECTION OF VALLEY ROAD AND PARK STREET LOOKING NORTHEAST TOWARDS SITE (POTENTIAL SEASONAL VISIBILITY)







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 3 - EXISTING VIEW FROM NORTH STREET LOOKING NORTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 3 - PROPOSED VIEW FROM NORTH STREET LOOKING NORTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 4 - EXISTING VIEW FROM VALLEY ROAD LOOKING EAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 4 - PROPOSED VIEW FROM VALLEY ROAD LOOKING EAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 5 - EXISTING VIEW FROM INTERSECTION OF NORTH STREET AND CHESTNUT STREET LOOKING NORTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 5 - PROPSOED VIEW FROM INTERSECTION OF NORTH STREET AND CHESTNUT STREET LOOKING NORTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 6 - NON-VISIBLE VIEW FROM VALLEY ROAD LOOKING SOUTHWEST TOWARDS SITE (POTENTIAL SEASONAL VISIBILITY)







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 7 - EXISTING VIEW FROM RIVER ROAD LOOKING WEST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 7 - PROPOSED VIEW FROM RIVER ROAD LOOKING WEST TOWARDS SITE





Photosim for conceptual purposes only - actual antenna and equipment locations to be determined based on final engineering design



**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 8 - NON-VISIBLE VIEW FROM MIANUS RIVER NATIONAL PARK LOOKING NORTH TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 9 - NON-VISIBLE VIEW FROM MIANUS RIVER PARK TRAILS LOOKING SOUTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 10 - NON-VISIBLE VIEW FROM WESTOVER ELEMENTARY SCHOOL LOOKING NORTHWEST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 11 - NON-VISIBLE VIEW FROM SCALZI PARK AND J.M. WRIGHT TECHNICAL HIGH SCHOOL LOOKING NORTHWEST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 12 - NON-VISIBLE VIEW FROM STILLMEADOW SCHOOL LOOKING WEST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 13 - NON-VISIBLE VIEW FROM ROXBURY SCHOOL LOOKING SOUTHWEST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 14 - NON-VISIBLE VIEW FROM BETH-EL CEMETERY LOOKING SOUTH TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 15 - NON-VISIBLE VIEW FROM FORT STAMFORD LOOKING SOUTH TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 16 - NON-VISIBLE VIEW FROM NORTH MIANUS SCHOOL LOOKING NORTH TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 17 - NON-VISIBLE VIEW FROM CENTRAL MIDDLE SCHOOL LOOKING NORTHEAST TOWARDS SITE







**DATE: SEP 2011** 

SITE: CT1887 AQUARION WATER TANK VIEW 18 - NON-VISIBLE VIEW FROM THE STANWICH SCHOOL LOOKING SOUTHEAST TOWARDS SITE



## Exhibit D



August 4, 2011

New Cingular Wireless PCS, LLC 500 Enterprise Drive Rocky Hill, CT 06067

RE: **Tree Inventory** 

Site: CT1887 Aquarion Water Tank

455 Valley Road Cos Cob, CT 06807 CHA# 18301-1077-43000

A site survey was completed at the subject site in July of 2011. A requirement of the survey involved determining the location of all trees within the topographic survey area with a diameter at breast height of 6" or larger. As can be seen on the site access map, no trees with a diameter of 6" or larger need to be removed for construction of the facility.

If you have any questions, comments or need further information, please do not hesitate to contact our office.

Very truly yours,

CLOUGH HARBOUR & ASSOCIATES LLP

Paul Lusitani

Paul Lusitani Project Engineer

W:\SAI Cingular\18301\Sites\1077 Greenwich 1887\ZD\GREENWICH-8 TREE INVENTORY.doc

## Exhibit E





WETLANDS DELINEATION REPORT

**imagination** | **innovation** | **energy** Creating results for our clients and benefits for our communities

## Vanasse Hangen Brustlin, Inc.

Date:	August 15, 2011			
Project No.:	41502.45			
Prepared For:	New Cingular Wireless PCS, LLC 500 Enterprise Drive, Suite 3A Rocky Hill, Connecticut, 06067			
Site Location:	Aquarion Water Tank - 455 Valley Road, Greenwich (Cos Cob), Connecticut			
Site Map:	Wetland Sketch, dated June 20, 2011			
Inspection Date:	June 20, 2011		a was a some a second	
Field Conditions:	Weather: sunny, mid 70's Snow Depth: 0 inches		General Soil Moisture: moist Frost Depth: 0 inches	
Type of Wetlands Identified and Delineated:				
Connecticut Inland Wetlands and Watercourses  Tidal Wetlands U.S. Army Corps of Engineers				
Local Regulated Upland Review Areas: Wetlands*: 150 feet Watercourses*: 200 feet * Within public water supply watershed (Mianus River Watershed)				
<b>Field Numbering Sequence of Wetlands Boundary:</b> WF 1 to 13 [as depicted on attached wetland sketch map]				

The classification systems of the National Cooperative Soil Survey, the U.S. Department of Agriculture, Natural Resources Conservation Service, County Soil Survey Identification Legend, Connecticut Department of Environmental Protection and United States Army Corps of Engineers New England District were used in this investigation.

All established wetlands boundary lines are subject to change until officially adopted by local, state, or federal regulatory agencies.

The wetlands delineation was conducted and reviewed by:

Dean Gustafson

Professional Soil Scientist

**Enclosures** 

## **Attachments**

- Wetland Delineation Field Form
- Soil Map
- Soil Report Wetland Delineation Sketch Map

## **Wetland Delineation Field Form**

Project Address:	455 Valley		Project N	umber:	41502.45	
	Greenwich (Cos Cob), Connecticut				D G . 6 DGG	
Inspection Date:	June 20, 20	11	Inspector:		Dean Gustafson, PSS	
Wetland I.D.:	Wetland 1					
			• 			
Field Conditions:	Weathe	r: sunny, mid 70's		Snow Depth: 0 inches		
	General Soil Moisture: moist			Frost Depth: 0 inches		
Type of Wetland l	Type of Wetland Delineation: Connecticut					
ACC		ACOE				
		Tidal				
Field Numbering	Sequence: W	F 1 to 13				
WETLAND HYI	OROLOGY:					
NONTIDAL						
Intermittently Flo	oded 🗌	Artificially Flooded		Pern	nanently Flooded 🔀	
Semipermanently	Flooded	Seasonally Flooded 🛛		Tem	porarily Flooded	
Permanently Satur	rated 🗌	Seasonally Saturated – s	seepage [	Seasonally Saturated - perched		
Comments:						
TIDAL						
Subtidal Regularly Flooded			Irregularly Flooded			
Irregularly Flooded						
Comments: N/A						
WETLAND TYP	PE:					
SYSTEM:						
Estuarine		Riverine 🔀		Palustri	ne 🗌	
Lacustrine		Marine				
Comments: dammed portion of Mianus River forms Mill Pond						
CLASS:						
		Scrub-shrub	ıb-shrub For		ested 🛛	
Open Water Disturbed Disturbed		Disturbed 🔀		Wet Meadow		
Comments: forested & developed bordering edge of Mianus River/Mill Pond						
WATERCOURSE TYPE:						
Perennial X		Intermittent		Tidal		
Comments: Mianus River						
SPECIAL AQUA	ATIC HABIT			Т	1	
Vernal Pool		Other				
Comments: N/A						

## **Wetland Delineation Field Form (Cont.)**

## **MAPPED SOILS:**

SOIL SERIES (Map Unit Symbol)	WET	UP	NRCS MAPPED	FIELD IDD/ CONFIRMED
Ridgebury, Leicester, and Whitman soils, extremely stony (3)	$\boxtimes$			$\boxtimes$
Canton and Charlton soils (61)		$\boxtimes$	$\boxtimes$	$\boxtimes$
Udorthents-Urban land complex (306)		$\boxtimes$	$\boxtimes$	$\boxtimes$

## **DOMINANT PLANTS:**

sugar maple (Acer saccharum)	Japanese barberry (Berberis thunbergii)
winged euonymus (Euonymus alatus)	common spicebush (Lindera benzoin)
white ash (Fraxinus americana)	American sycamore (Platanus occidentalis)

## **WETLAND NARRATIVE:**

Wetland 1 is identified as the edge of the Mianus River consisting of some upland bordering forest and a concrete retaining wall as the boundary of the delineated wetland. This concrete retaining wall provides the boundary for most of the Mianus River through the subject parcel. A dam is located near wetland flag WF 13, forming a ponded portion of the Mianus River known as Mill Pond. The Mianus River bank is located approximately 50 feet east of the proposed telecommunications ground equipment.



## Natural Resources Conservation Service

## MAP LEGEND

# Area of Interest (AOI)

Area of Interest (AOI)

Very Stony Spot 8

Wet Spot Other

## Special Line Features

Soil Map Units

Soils

Special Point Features

Blowout

Э  $\times$ 

Please rely on the bar scale on each map sheet for accurate map

Web Soil Survey URL: http://websoilsurvey.nrcs.usda.gov Coordinate System: UTM Zone 18N NAD83

This product is generated from the USDA-NRCS certified data as of

Soil Survey Area: State of Connecticut Survey Area Data: Version 10, Mar 31, 2011

imagery displayed on these maps. As a result, some minor shifting The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background of map unit boundaries may be evident.



**Borrow Pit** Clay Spot



Closed Depression



**Gravelly Spot** 

**Gravel Pit** 





Marsh or swamp

Lava Flow

Landfill

Mine or Quarry









Miscellaneous Water

Perennial Water

Rock Outcrop

Saline Spot





Sinkhole

Slide or Slip Sodic Spot

Stony Spot Spoil Area

## MAP INFORMATION

Map Scale: 1:1,390 if printed on A size (8.5" x 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:12,000.

measurements.

Source of Map: Natural Resources Conservation Service

the version date(s) listed below.

Date(s) aerial images were photographed: 7/16/2006

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## **Map Unit Legend**

State of Connecticut (CT600)					
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI		
73C	Charlton-Chatfield complex, 3 to 15 percent slopes, very rocky	3.5	40.8%		
75E	Hollis-Chatfield-Rock outcrop complex, 15 to 45 percent slopes	2.5	28.6%		
275C	Urban land-Chatfield complex, rocky, 3 to 15 percent slopes	1.5	17.2%		
W	Water	1.2	13.4%		
Totals for Area of Interest		8.6	100.0%		

## **Map Unit Description (Brief, Generated)**

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions in this report, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

The Map Unit Description (Brief, Generated) report displays a generated description of the major soils that occur in a map unit. Descriptions of non-soil (miscellaneous areas) and minor map unit components are not included. This description is generated from the underlying soil attribute data.

Additional information about the map units described in this report is available in other Soil Data Mart reports, which give properties of the soils and the limitations, capabilities, and potentials for many uses. Also, the narratives that accompany the Soil Data Mart reports define some of the properties included in the map unit descriptions.

## Report—Map Unit Description (Brief, Generated)

## **State of Connecticut**

Map Unit: 73C—Charlton-Chatfield complex, 3 to 15 percent slopes, very rocky

Component: Charlton (45%)

The Charlton component makes up 45 percent of the map unit. Slopes are 3 to 15 percent. This component is on hills, uplands. The parent material consists of coarse-loamy melt-out till derived from granite and/or schist and/or gneiss. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is moderate. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 4 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria.

Component: Chatfield (30%)

The Chatfield component makes up 30 percent of the map unit. Slopes are 3 to 15 percent. This component is on hills, ridges, uplands. The parent material consists of coarse-loamy melt-out till derived from granite and/or schist and/or gneiss. Depth to a root restrictive layer, bedrock, lithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 75 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria.

Component: Rock outcrop (6%)

Generated brief soil descriptions are created for major components. The Rock outcrop soil is a minor component.

Component: Hollis (5%)

Generated brief soil descriptions are created for major components. The Hollis soil is a minor component.

Component: Leicester (5%)

Generated brief soil descriptions are created for major components. The Leicester soil is a minor component.

Component: Sutton (5%)

Generated brief soil descriptions are created for major components. The Sutton soil is a minor component.

Component: Unnamed, red parent material (2%)

Generated brief soil descriptions are created for major components. The Unnamed soil is a minor component.

Component: Unnamed, sandy subsoil (2%)

Generated brief soil descriptions are created for major components. The Unnamed soil is a minor component.

Map Unit: 75E—Hollis-Chatfield-Rock outcrop complex, 15 to 45 percent slopes

Component: Hollis (35%)

The Hollis component makes up 35 percent of the map unit. Slopes are 15 to 45 percent. This component is on hills, ridges, uplands. The parent material consists of loamy melt-out till derived from granite and/or schist and/or gneiss. Depth to a root restrictive layer, bedrock, lithic, is 10 to 20 inches. The natural drainage class is somewhat excessively drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is very low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 40 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria.

## Component: Chatfield (30%)

The Chatfield component makes up 30 percent of the map unit. Slopes are 15 to 45 percent. This component is on hills, ridges, uplands. The parent material consists of coarse-loamy melt-out till derived from granite and/or schist and/or gneiss. Depth to a root restrictive layer, bedrock, lithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 75 percent. Nonirrigated land capability classification is 7s. This soil does not meet hydric criteria.

## Component: Rock outcrop (15%)

Generated brief soil descriptions are created for major soil components. The Rock outcrop is a miscellaneous area.

## Component: Charlton (7%)

Generated brief soil descriptions are created for major components. The Charlton soil is a minor component.

## Component: Leicester (5%)

Generated brief soil descriptions are created for major components. The Leicester soil is a minor component.

## Component: Sutton (5%)

Generated brief soil descriptions are created for major components. The Sutton soil is a minor component.

## Component: Brimfield (1%)

Generated brief soil descriptions are created for major components. The Brimfield soil is a minor component.

## **Component:** Unnamed, red parent material (1%)

Generated brief soil descriptions are created for major components. The Unnamed soil is a minor component.

Component: Unnamed, sandy subsoil (1%)

Generated brief soil descriptions are created for major components. The Unnamed soil is a minor component.

Map Unit: 275C—Urban land-Chatfield complex, rocky, 3 to 15 percent slopes

Component: Urban land (45%)

Generated brief soil descriptions are created for major soil components. The Urban land is a miscellaneous area.

Component: Chatfield (30%)

The Chatfield component makes up 30 percent of the map unit. Slopes are 3 to 15 percent. This component is on hills, ridges, uplands. The parent material consists of coarse-loamy melt-out till derived from granite and/or schist and/or gneiss. Depth to a root restrictive layer, bedrock, lithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately high. Available water to a depth of 60 inches is low. Shrink-swell potential is low. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 75 percent. Nonirrigated land capability classification is 6s. This soil does not meet hydric criteria.

Component: Charlton (5%)

Generated brief soil descriptions are created for major components. The Charlton soil is a minor component.

Component: Hollis (5%)

Generated brief soil descriptions are created for major components. The Hollis soil is a minor component.

Component: Leicester (5%)

Generated brief soil descriptions are created for major components. The Leicester soil is a minor component.

Component: Sutton (5%)

Generated brief soil descriptions are created for major components. The Sutton soil is a minor component.

Component: Udorthents (3%)

Generated brief soil descriptions are created for major components. The Udorthents soil is a minor component.

Component: Rock outcrop (2%)

Generated brief soil descriptions are created for major components. The Rock outcrop soil is a minor component.

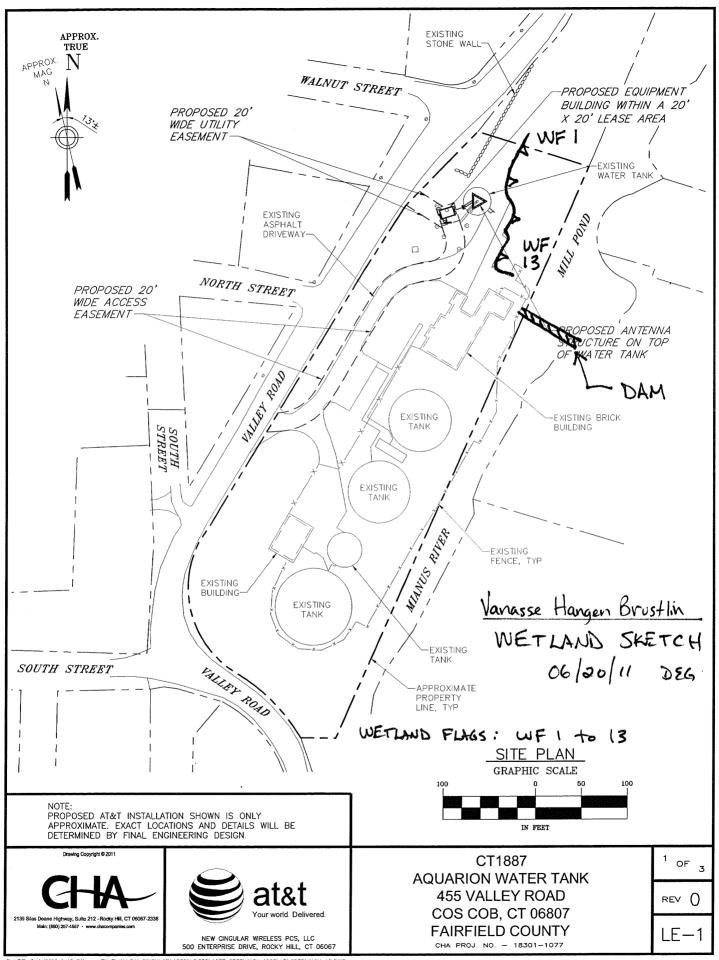
Map Unit: W—Water

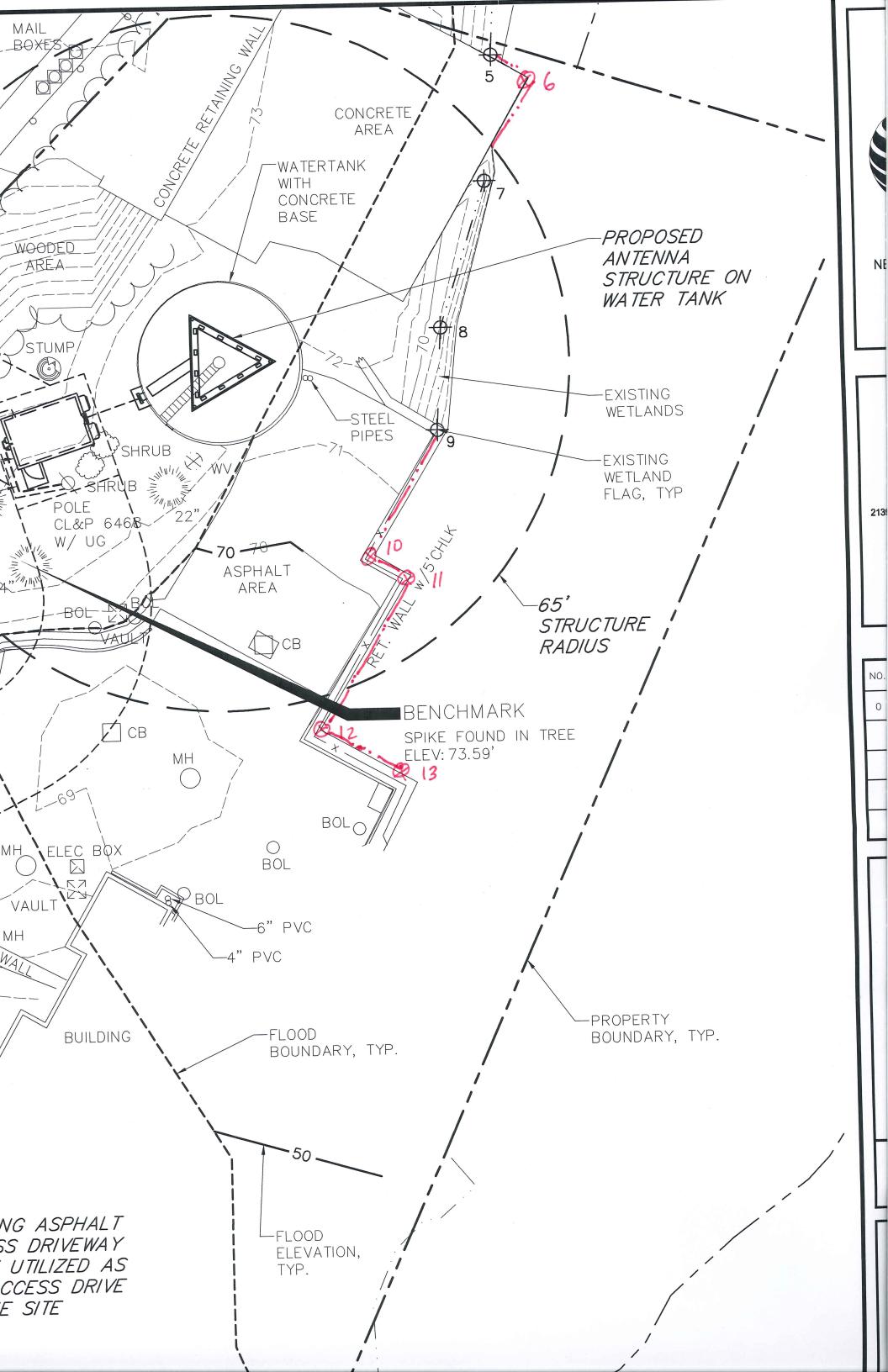
Component: Water (100%)

Generated brief soil descriptions are created for major soil components. The Water is a miscellaneous area.

## **Data Source Information**

Soil Survey Area: State of Connecticut Survey Area Data: Version 10, Mar 31, 2011





## Exhibit F



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# Calculated Radio Frequency Emissions



SR1887

455 Valley Road, Cos Cob, CT 06807

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#### 1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the proposed AT&T installation on the water tank located at 455 Valley Road, CT. The coordinates of the site are 41-4-5.3 N, 73-34-45.8 W.

AT&T is proposing the following:

- 1) Install 12 quad-band panel antennas (4 per sector) at 60' AGL;
- 2) Install an equipment shelter on the ground to house the base-station equipment;

#### 2. FCC Guidelines for Evaluating RF Radiation Exposure Limits

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by OET Bulletin 65 Edition 97-01. These new rules include Maximum Permissible Exposure (MPE) limits for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based upon those recommended by the National Council on Radiation Protection and Measurements (NCRP), developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

The FCC general population/uncontrolled limits set the maximum exposure to which most people may be subjected. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

Public exposure to radio frequencies is regulated and enforced in units of milliwatts per square centimeter (mW/cm<sup>2</sup>). The general population exposure limits for the various frequency ranges are defined in the attached "FCC Limits for Maximum Permissible Exposure (MPE)" in Attachment B of this report.

Higher exposure limits are permitted under the occupational/controlled exposure category, but only for persons who are exposed as a consequence of their employment and who have been made fully aware of the potential for exposure, and they must be able to exercise control over their exposure. General population/uncontrolled limits are five times more stringent than the levels that are acceptable for occupational, or radio frequency trained individuals. Attachment B contains excerpts from OET Bulletin 65 and defines the Maximum Exposure Limit.

Finally, it should be noted that the MPE limits adopted by the FCC for both general population/uncontrolled exposure and for occupational/controlled exposure incorporate a substantial margin of safety and have been established to be well below levels generally accepted as having the potential to cause adverse health effects.

SR1887 1 August 4, 2011



#### 3. RF Exposure Prediction Methods

The emission field calculation results displayed in the following figures were generated using the following formula as outlined in FCC bulletin OET 65:

Power Density = 
$$\left(\frac{1.6^2 \times EIRP}{4\pi \times R^2}\right)$$
 x Off Beam Loss

Where:

EIRP = Effective Isotropic Radiated Power

$$R = Radial Distance = \sqrt{(H^2 + V^2)}$$

H = Horizontal Distance from antenna in meters

V = Vertical Distance from radiation center of antenna in meters

Ground reflection factor of 1.6

Off Beam Loss determined by the selected antenna pattern

These calculations assume that the antennas are operating at 100 percent capacity and power, and that all antenna channels are transmitting simultaneously. Obstructions (trees, buildings, etc.) that would normally attenuate the signal are not taken into account. As a result, the predicted signal levels reported below are much higher than the actual signal levels will be from the finished modifications.



#### 4. Calculation Results

Table 1 below outlines the power density information for the site. Because the antennas used by AT&T are directional in nature, the majority of the RF power is focused towards the horizon. As a result, there will be less RF power directed below the antennas relative to the horizon, and consequently lower power density levels around the base of the water tank. Please refer to Attachment C for the vertical patterns of the proposed AT&T antennas. The % MPE values in Table 1 are calculated at 6' above ground (to approximate the height of a human standing at base of water tank) and include a nominal 10 dB off-beam pattern loss to account for the lower relative gain below the directional antennas.

Carrier	Antenna Model	Antenna Height (Feet)	Operating Frequency (MHz)	Number of Trans.	ERP Per Transmitter (Watts)	Power Density (mw/cm²)	Limit	%MPE
AT&T UMTS	P65-17-XLH-RR	60	1900	1	500	0.0062	1.0000	0.62%
AT&T LTE	P65-17-XLH-RR	60	716	1	1077	0.0133	0.4773	2.78%
AT&T UMTS	P65-17-XLH-RR	60	880	1	660	0.0081	0.5867	1.39%
AT&T GSM	P65-17-XLH-RR	60	1900	1	427	0.0053	1.2667	0.42%
AT&T GSM	P65-17-XLH-RR	60	880	3	550	0.0203	0.5867	3.47%
					_		Total	8.67%

Table 1: Carrier % MPE Information at Base of Water Tank<sup>1</sup>

\_

<sup>&</sup>lt;sup>1</sup> Calculated values include a -10 dB off-beam loss factor (see Attachment C) due to relevant antenna patterns.



Due to the topography of the surrounding area, additional calculations have been performed at points located away from the water tank to consider the steep upgrade heading northwest and southeast from the water tank. Figure 1 shows an aerial view of 16 sample points, located in increments of 50' & 100' away from the silo in a northwesterly and southeasterly direction. These bearings represent the steepest grade from the site and consequently worst-case calculations due to the upslope in ground elevation compared to other directions.

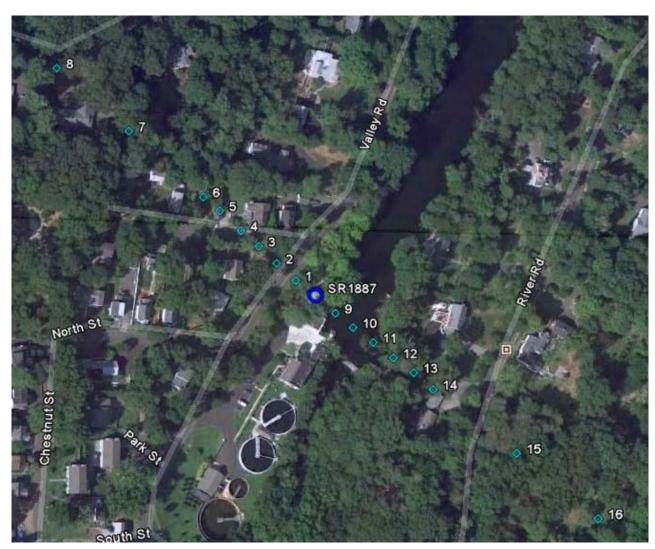


Figure 1: Aerial View Around Water Tank (Courtesy of Google Earth<sup>TM</sup>)



Table 2 below outlines the ground elevation differences of the 16 sample points compared to the water tank, and the calculated power densities at each location.

Water	Tople	Cround	Elevation.	QALANACT	
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Sample Point	Ground Elevation (ft AMSL)	Distance From Silo (ft)	AT&T %MPE (Gen'l Public)
Base of Water			
Tank	84	0	8.67%
1	89	50	5.16%
2	93	100	2.10%
3	96	150	1.04%
4	99	200	0.61%
5	103	250	0.40%
6	104	300	0.28%
7	115	500	1.01%
8	127	700	0.52%
9	81	50	4.40%
10	81	100	1.91%
11	87	150	1.01%
12	90	200	0.60%
13	92	250	0.39%
14	96	300	0.28%
15	107	500	0.90%
16	113	700	0.52%

**Table 2: % MPE Levels at Sample Points<sup>2</sup>** 

Please note that sample points 7,8, and 16 are within the main beam of all antennas on the water tank and therefore no off-beam loss is factored into the calculations. The other sample points are outside of the main beam of the antennas and therefore a -10 dB off-beam loss factor is included in the calculations.

\_

 $<sup>^2\,\%\</sup>text{MPE}$  calculations include a nominal -10dB antenna off-beam loss factor where appropriate.



#### 5. Conclusion

The above analysis verifies that emissions from the proposed installation will be below the maximum power density levels as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Even when using conservative methods, the cumulative power density from the transmit antennas at the facility is below the limits for the general public. The highest expected percent of Maximum Permissible Exposure at the base of the water tank is 8.67% of the FCC limit.

As noted in the introduction, obstructions (trees, buildings etc.) that would normally attenuate the signal are not taken into account. As a result, the predicted signal levels are more conservative (higher) than the actual signal levels will be from the finished modifications.

#### 6. Statement of Certification

I certify to the best of my knowledge that the statements in this report are true and accurate. The calculations follow guidelines set forth in ANSI/IEEE Std. C95.3, ANSI/IEEE Std. C95.1 and FCC OET Bulletin 65 Edition 97-01.

Daniel L. Goulet

C Squared Systems, LLC

August 23, 2011

Date



#### **Attachment A: References**

OET Bulletin 65 - Edition 97-01 - August 1997 Federal Communications Commission Office of Engineering & Technology

ANSI C95.1-1982, American National Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz IEEE-SA Standards Board

<u>IEEE Std C95.3-1991 (Reaff 1997), IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave IEEE-SA Standards Board</u>



#### **Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)**

### (A) Limits for Occupational/Controlled Exposure<sup>3</sup>

Frequency	Electric Field	Magnetic Field	Power Density (S)	Averaging Time
Range	Strength (E)	Strength (E)		$ E ^2$ , $ H ^2$ or S (minutes)
(MHz)	(V/m)	(A/m)	$(mW/cm^2)$	E ,  H  or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	$(900/f^2)*$	6
30-300	61.4	0.163	1.0	6
300-1500	-	-	f/300	6
1500-100,000	-	-	5	6

## (B) Limits for General Population/Uncontrolled Exposure<sup>4</sup>

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm <sup>2</sup> )	Averaging Time $ E ^2$ , $ H ^2$ or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	$(180/f^2)*$	30
30-300	27.5	0.073	0.2	30
300-1500	-	-	f/1500	30
1500-100,000	-	-	1.0	30

f = frequency in MHz \* Plane-wave equivalent power density

Table 3: FCC Limits for Maximum Permissible Exposure (MPE)

2

<sup>&</sup>lt;sup>3</sup> Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure

<sup>&</sup>lt;sup>4</sup> General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure



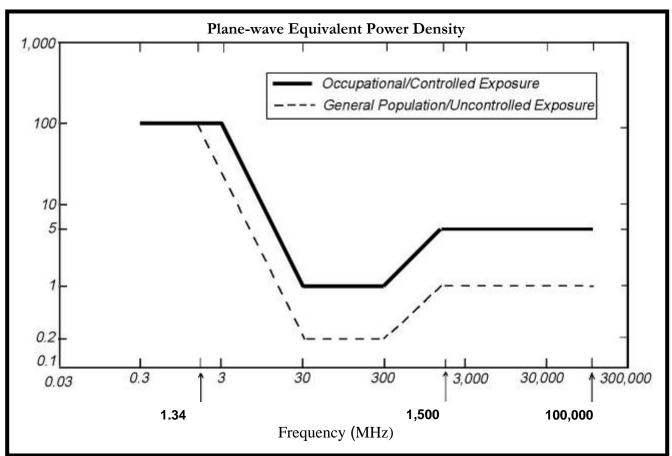
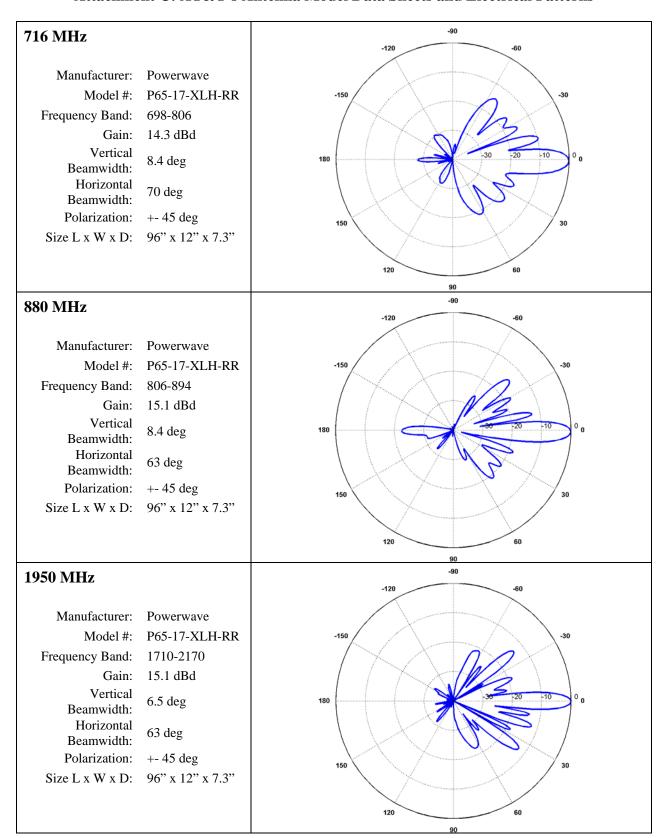


Figure 2: Graph of FCC Limits for Maximum Permissible Exposure (MPE)



#### Attachment C: AT&T's Antenna Model Data Sheets and Electrical Patterns



## Exhibit G

