

**Petition No. 1461**  
**SBA Communications Corporation**  
**130 Welles Road, Groton**  
**DRAFT Staff Report**  
**November 12, 2021**

**Introduction**

On August 18, 2021, SBA Communications Corporation (SBA) submitted a petition (Petition) to the Connecticut Siting Council (Council) for a declaratory ruling pursuant to Connecticut General Statutes (CGS) §4-176 and §16-50k for the proposed replacement and extension of an existing telecommunications facility located at 130 Welles Road in the Town of Groton (Town).

Notice was provided to the Town, the property owner and abutting property owners on August 16, 2021. On August 19, 2021, the Council sent correspondence to the Town stating that the Council has received the Petition and invited the municipality to contact the Council with any questions or comments by September 17, 2021. No comments have been received.

On September 9, 2021, the Council granted intervenor status to New Cingular Wireless PCS, LLC (AT&T). The Council submitted interrogatories to AT&T on October 12, 2021, and AT&T submitted responses to the interrogatories on October 25, 2021. The Council submitted interrogatories to SBA on October 12, 2021, and SBA submitted responses to the interrogatories on October 26, 2021.

On October 7, 2021, pursuant to CGS §4-176(e) of the Uniform Administrative Procedure Act, which requires an administrative agency to take action on a petition within 60 days of receipt, the Council voted to set the date by which to render a decision on the petition as February 14, 2022, the statutorily-mandated 180-day decision deadline for this petition under CGS §4-176(i).

**Existing Telecommunications Facility**

The Council issued a Certificate to Sprint Spectrum L.P. for this facility on December 19, 2002 in Docket No. 230. The existing 120-foot monopole is located in the northeast portion of an 8.55-acre property owned by the Town formerly used as the Town landfill. The site is currently part of Groton's Shady Oaks Park. The site property is located in the Town's RU-80 Zone and is accessed from Welles Road.

On February 25, 2019, the Council approved an Eligible Facilities Request by AT&T to co-locate at the 98-foot level of the tower due to removal of a water tank located at 35 Nantucket Drive in Mystic which supported AT&T antennas.

Current tower users include AT&T at 98 feet above ground level (agl), T-Mobile at 108 feet agl, and Sprint at 117.5 feet agl.

**Proposed Telecommunications Facility**

A replacement tower (approximately 60 feet taller) is needed for AT&T to provide improved wireless service along significant portions of Route 184 as well as local roads and to increase network capacity by providing service to a portion of the surrounding area previously covered by the water tank site. Specifically, the proposed replacement facility would provide coverage and capacity for the 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, and 2300 MHz frequency bands. AT&T would require a minimum antenna

centerline height of 176 feet agl to meet its wireless service objectives. AT&T's proposed installation will support 5G services at this facility.

SBA proposes to install a 180-foot replacement monopole facility approximately 23 feet to the northwest of the existing facility location and within the same fenced compound. The proposed replacement monopole would have a galvanized gray finish. A lightning rod on top of the tower would reach a height of 184 feet. The proposed replacement monopole would be located approximately 37 feet south of the nearest property line. Thus, the tower setback radius would extend onto a Town parcel to the north by approximately 143 feet. The proposed replacement monopole could be designed with a yield point to ensure that the tower setback radius remains within the boundaries of the subject property. However, SBA believes that, given the property to the north is also Town-owned, a design yield point would not be warranted. Installation of a design yield point would increase the tower cost by approximately 10-12%. Notwithstanding, if approved, Council staff suggests including a condition for a tower yield point.

AT&T would install 9 panel antennas and 12 remote radio units on a low-profile platform at a centerline height of approximately 176 feet agl on the replacement tower. Sprint and T-Mobile would re-locate onto the replacement tower at the 117.5 foot and the 108-foot levels of the tower, respectively.

Dish Network has future plans to co-locate at the 160 foot level of the tower. If this Petition is approved, Dish Network should file a Request for an Order to Approve Tower Sharing with the Council pursuant to CGS §16-50aa.

SBA would not expand the existing fence compound to accommodate the project. AT&T would utilize its existing equipment shelter located within the compound. Sprint and T-Mobile would utilize their existing equipment within the compound. Existing ice bridges for AT&T, Sprint and T-Mobile would be modified to accommodate the new tower location relative to the existing equipment pads. SBA would utilize existing access and utilities to the site.

AT&T has an existing 15-kilowatt diesel backup generator that holds 54 gallons of fuel and could run for approximately 90 hours before refueling is required. AT&T also has an existing battery backup that could provide approximately eight hours of backup power in the event that the generator fails to start

Commercial Mobile Radio Service (CMRS) providers are licensed by and are under the jurisdiction and authority of the Federal Communications Commission (FCC). At present, no standards for backup power for CMRS providers have been promulgated by the FCC. Every year since 2006, AT&T, Sprint, T-Mobile, and Verizon have certified their compliance with the CTIA Business Continuity/Disaster Recovery Program and the Communications Security, Reliability and Interoperability Council standards and best practices to ensure network reliability during power outages.

The estimated cost of the proposed facility is:

SBA Costs (including tower)	\$ 331,050
AT&T Materials	\$ 46,000
AT&T Labor	\$ 88,000
<b><u>Total Estimated Costs</u></b>	<b><u>\$ 465,050</u></b>

## **Environmental**

No trees would need to be removed for the project.

The proposed facility is not located within a Connecticut Department of Energy and Environmental Protection (DEEP) Natural Diversity Database (NDDB) buffered area. Additionally, given that all work would be located within the existing fenced compound, SBA does not anticipate that any construction activities would impact state-listed species. Thus, no protective measures are proposed.

The nearest wetland is located approximately 385 feet east of the proposed replacement tower location. SBA would incorporate appropriate soil erosion and sedimentation control measures consistent with the 2002 *Connecticut Guidelines for Soil Erosion and Sediment Control* prior to the commencement of construction. With such measures, SBA does not anticipate that construction of the project would adversely impact this wetland. If approved, staff recommends submission of a Soil Erosion and Sediment Control Plan prior to the commencement of construction.

The site is located in the Federal Emergency Management Agency (FEMA) unshaded Zone X, an area of minimal flood hazard and outside of the 500-year flood zone.

SBA performed a visual impact assessment of the proposed replacement facility. The replacement tower will be visible in the vicinity of the subject property, along the eastern portion of Wells Road and for a 0.05-mile stretch of Gold Star Highway. The replacement tower will also be partially visible from numerous locations along Shewville Road to the east between Route 184 and Hyde Pond Court and from a portion of Packer Road to the southwest between Cow Hill Road and Gold Star Highway. However, in many of these locations, like the existing tower, the proposed replacement tower would only have seasonal visibility due to intervening vegetation in the leaf-on months and/or only the upper portion of the proposed replacement tower would be visible above the tree line.

Overall, due to the topography and intervening vegetation in the area where the proposed replacement facility would be located, the full profile of the proposed tower is not anticipated to be visible from any of the surrounding residential areas.

## **Public Safety**

On June 6, 2020, the Federal Aviation Administration (FAA) issued a Determination of No Hazard to Air Navigation (No Hazard Determination) for the proposed replacement facility. However, this No Hazard Determination is based on tower coordinates that are approximately 25 feet away from the proposed replacement tower location. Council staff suggests that a revised FAA Determination be submitted prior to commencement of construction.

The project would be constructed in accordance with the latest edition of the International Building Code and the American National Standards Institute "Structural Standards for Steel Antenna Towers and Antenna Support Structures" Revision G.

The proposed replacement facility would comply with DEEP Noise Control Standards. The existing backup generator is exempt from DEEP Noise Control Regulations §22a-69-1.8.

The cumulative calculated power density would be 10.6 percent of the applicable limit using a -10 dB off-beam adjustment.

### **Construction Schedule**

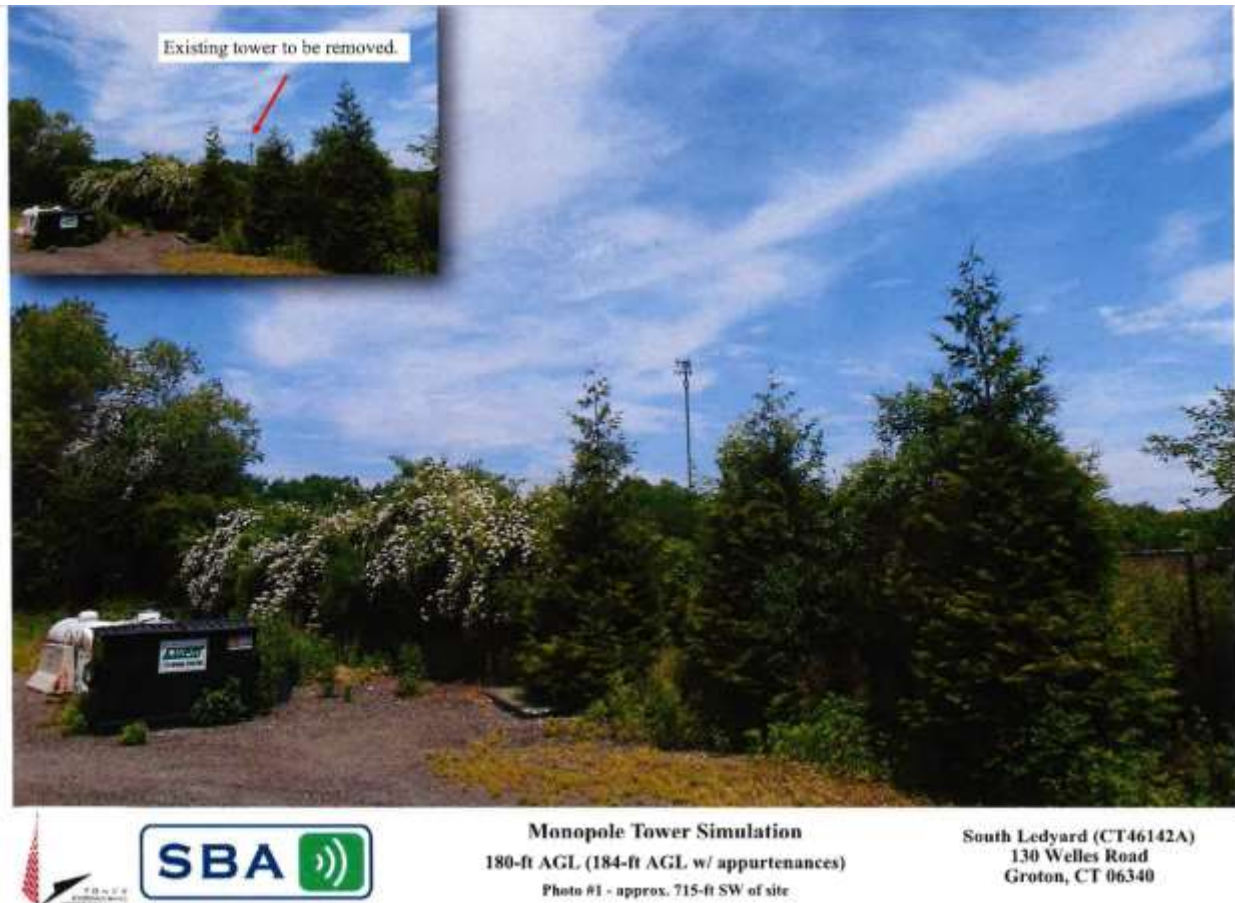
If approved, construction is expected to commence shortly thereafter. Work would be performed Monday through Saturday from 8:00 a.m. to 5:00 p.m.

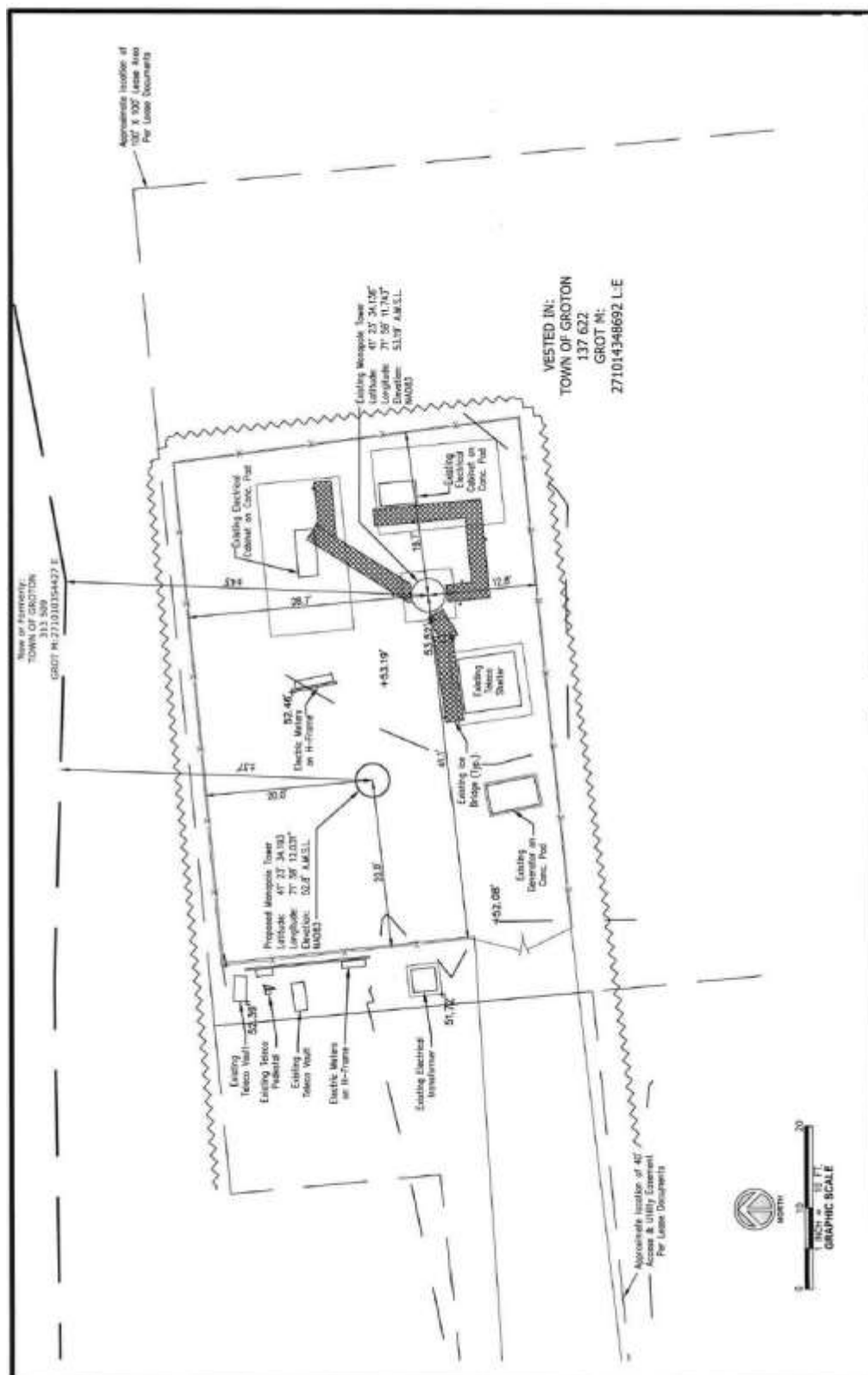
### **Conclusion**

If approved, staff recommends the following conditions:

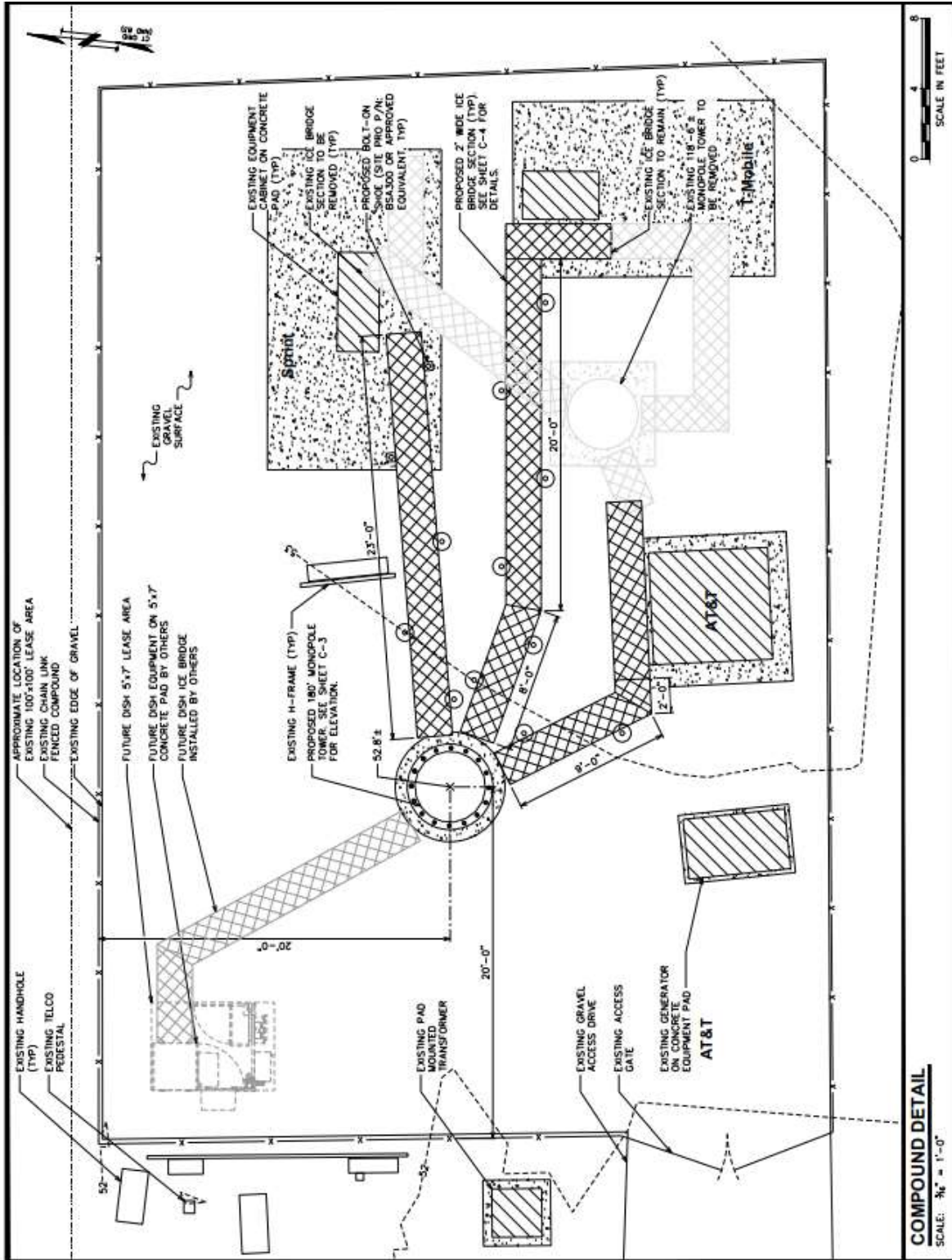
- 1) Approval of any project changes be delegated to Council staff;
- 2) Submission of the Erosion and Sediment Control Plan prior to the commencement of construction;
- 3) Submission of the final FAA Determination prior to commencement of construction;
- 4) Submission of the final structural design drawings for the tower and foundation stamped by a Professional Engineer duly licensed in the State of Connecticut prior to commencement of construction;
- 5) The final structural design drawings shall include a yield point to ensure that the tower setback radius remains within the boundaries of the subject property;
- 6) Notification of commencement and completion of construction;
- 7) Unless otherwise approved by the Council, the existing monopole shall be removed within 180 days of the installation of the new monopole; and
- 8) The Council shall be notified in writing within 45 days of when the existing monopole is removed and the new monopole is operational unless a written request for an extension is submitted to the Council within that timeframe.

**View of existing tower and the proposed replacement tower from approximately 715 feet to the southwest**





# Proposed Site Plan



### Proposed Replacement Tower Elevation Drawing

