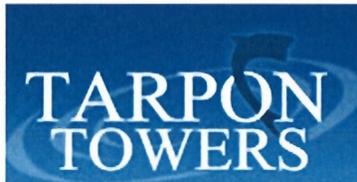


Connecticut Siting Council

APPLICATION OF TARPON TOWERS II, LLC
AND
CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



BRIDGEPORT EAST
380 HORACE STREET
BRIDGEPORT, CONNECTICUT

DOCKET NO. _____

SEPTEMBER 25, 2017

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LIST OF ATTACHMENTS

1. Bridgeport East Facility – Factual Summary and Project Plans
2. Certificate of Service of Application on Government Officials and List of Officials Served
3. Legal Notice in the *Connecticut Post*
4. Notice to Landowners; List of Abutting Landowners; Certificate of Service
5. Federal Communications Commission Licenses
6. Coverage Maps – Bridgeport East and Surrounding Cell Sites
7. Antenna and Equipment Specifications
8. Site Search Summary
9. Visibility Analysis
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11. Wetlands Inspection
12. Vernal Pool Analysis
13. State Historic Preservation Office Determination
14. General Power Density Table
15. FEMA – Flood Insurance Rate Map
16. Federal Aviation Administration Determination
17. Redacted Land Lease Agreement; Redacted First Amendment to Land Lease; and Assignment and Assumption of Lease

EXECUTIVE SUMMARY

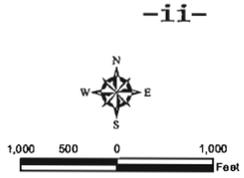
Tarpon Towers II, LLC (“Tarpon”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”), propose to construct a telecommunications tower and related facility (the “Bridgeport East Facility”) on an approximately 13.7 acre parcel at 380 Horace Street in Bridgeport, Connecticut (the “Property”). The Property is owned by MDL Realty LLC. The Bridgeport East Facility would provide improved wireless voice and data service along portions of Routes 1 and 127 in Bridgeport and Stratford. The Bridgeport East Facility will also provide capacity relief to Cellco’s existing East Bridgeport Relo, Bridgeport Washington Park and North Bridgeport 2 cell sites which are all currently operating beyond their respective capacity limits.

Tarpon plans to construct a 90-foot monopole tower in the northerly portion of the Property. Cellco would install twelve (12) panel-type antennas and nine (9) remote radio heads on an antenna platform at a height of 90 feet above ground level (“AGL”). The top of Cellco’s antennas will extend above the top of the tower to an overall height of approximately 94 feet AGL. Cellco’s equipment cabinets and a 25 kW natural gas-fueled generator would be installed on a 9’4” x 16’ steel equipment platform, with a canopy roof installed on the ground near the base of the tower. The tower and equipment platform will be located within a 2,500 square foot fenced compound and leased area. Vehicular access to the tower site would extend from Horace Street over an existing paved driveway and parking area on an adjacent parcel at 416 Horace Avenue, a distance of approximately 226 feet to the facility compound. Utilities would extend from existing service along Horace Street.



- Legend**
- Site
 - Municipal Boundary

Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrangle Map, Bridgeport (1984), CT
 Map Scale: 1:24,000
 Map Date: July 2017



Site Location Map

Proposed Wireless
 Telecommunications Facility
 Bridgeport East
 380 Horace Street
 Bridgeport, Connecticut



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Legend

-  Subject Property
-  Proposed Monopole Tower
-  Proposed Facility Layout
-  Approximate Parcel Boundary (CTDEEP GIS)

Map Notes:
 Base Map Source: 2016 Aerial Photograph (CTECO)
 Map Scale: 1 inch = 200 feet
 Map Date: July 2017

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Aerial Photograph

Proposed Wireless
 Telecommunications Facility
 Bridgeport East
 380 Horace Street
 Bridgeport, Connecticut



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. ____
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT :
380 HORACE STREET, BRIDGEPORT, :
CONNECTICUT : SEPTEMBER 25, 2017

APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

I. INTRODUCTION

A. Authority and Purpose

This Application and the accompanying attachments (collectively, the “Application”) is submitted by Tarpon Towers II, LLC (“Tarpon”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”), pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes (“C.G.S.”), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (“R.C.S.A.”), as amended. The Application requests that the Connecticut Siting Council (“Council”) issue a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction, maintenance, and operation of a wireless telecommunications facility on an approximately 13.7 acre parcel at 380 Horace Street in Bridgeport, Connecticut (the “Property”). Cellco identifies this site as its “Bridgeport

East Facility”.

The proposed Bridgeport East Facility would be located in the northerly portion of the Property. At this location, Tarpon would construct a 90-foot self-supporting monopole telecommunications tower. Cellco would install twelve (12) panel-type antennas and nine (9) remote radio heads (“RRHs”) on an antenna platform at 90 feet above ground level (“AGL”).¹ The top of Cellco’s antennas would extend above the top of the tower to an overall height of approximately 94 feet AGL. Equipment cabinets associated with Cellco’s antennas and a natural gas-fueled back-up generator would be located on a 9’-4” x 16’ equipment platform located on the ground near the base of the tower within a 2,500 square foot fenced compound and leased area. Vehicular access to the site would extend from Horace Street over an existing paved driveway and parking area on the adjacent parcel at 416 Horace Street a distance of approximately 226 feet to the cell site. Utilities will extend from existing service along Horace Street.

Included in this Application, as Attachment 1, is a factual summary and project plans for the Bridgeport East Facility. This summary, along with the other attachments submitted as part of this Application, contain all of the site-specific information required by statute and the regulations of the Council.

B. The Applicant

Tarpon is a Delaware Limited Liability Company with offices in Bradenton, Florida. Tarpon constructs, owns and maintains numerous telecommunications facilities in Connecticut and throughout the United States. Cellco is a Delaware Partnership with an administrative office

¹ Initially, Cellco would deploy its 700 MHz 1900 MHz and 2100 MHz frequencies at the Bridgeport East Facility.

located at 99 East River Drive, East Hartford, CT, 06108. Cellco is licensed by the Federal Communications Commission (“FCC”) to operate a wireless telecommunications system in the State of Connecticut within the meaning of C.G.S. Section 16-50i(a)(6). Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public. Operation of the wireless telecommunications systems and related activities are Cellco’s sole business in the State of Connecticut.

Correspondence and/or communications regarding this Application may be addressed to:

Tarpon Towers II, LLC
1001 3rd Avenue West, Suite 420
Bradenton, FL 34205
Attention: Keith Coppins
kcoppins@phoenixptrs.com

Cellco Partnership d/b/a Verizon Wireless
99 East River Drive
East Hartford, CT 06108
Attention: Anthony Befera
anthony.befera@verizonwireless.com

A copy of all such correspondence or communications should also be sent to:

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(860) 275-8200
Attention: Kenneth C. Baldwin, Esq.
kbaldwin@rc.com

C. Application Fee

The estimated total construction cost for the Bridgeport East Facility would be less than \$5,000,000. Therefore, pursuant to Section 16-50v-1a(b) of the Regulations of Connecticut State Agencies, an application fee of \$1,250 accompanies this Application in the form of a check payable

to the Council.

II. SERVICE AND NOTICE REQUIRED BY C.G.S. SECTION 16-50(b)

Copies of this Application have been sent to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50(b). A certificate of service, along with a list of the officials served with a copy of the Application, is included as Attachment 2.

Notice of the Applicant's intent to submit this Application was published on September 21 and September 22, 2017, by Cellco in the *Connecticut Post* pursuant to C.G.S. Section 16-50(b). A copy of the published legal notice is included as Attachment 3. An Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of the Applicant's intent to file this application was sent to each person appearing of record as an owner of land that may be considered to abut the Property in accordance with C.G.S. Section 16-50(b), as well as a list of the landowners to whom such notice was sent and a sample notice letter.

III. STATEMENT OF NEED AND BENEFITS FOR THE PROVISION OF ADVANCED AND RELIABLE WIRELESS SERVICES INFORMATION

The purpose of this section is to provide an overview and general description of the proposed Bridgeport East Facility.

A. Federal Policy

In 1996, the United States Congress adopted the federal Telecommunications Act (the "Act"). (Pub. L. No. 104-104, 110 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation in all aspects of the telecommunications industry, including facility siting, in order to foster lower

prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by states and municipalities, including the Council, with respect to public need for the service to be provided by the facility described in this application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, in order to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirements in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco's system throughout its New England and nationwide markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States Congress also enacted the Wireless Communications and Public Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004,

Congress enacted the Enhanced 911 Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued President Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy² to ensure that all Americans would have access to broadband capability, whether wired or wireless; to establish the United States as a leader in wireless service innovation; and to establish, in America, the fastest and most extensive wireless network.

In an effort to encourage a more timely review and approval of wireless facility siting applications, the FCC, in 2011, established specific time limits for local and State land use decisions on wireless facilities.³ In 2012, Congress passed the Middle Class Tax Relief and Job Creation Act which included a provision, Section 6409, which mandates the approval of certain eligible wireless facility modifications. The provisions of Section 6409 were further clarified in the FCC's October 17, 2014 Report and Order (FCC No. 14-153) and were specifically designed to accelerate broadband deployment by improving the efficiencies of the wireless facility siting process.

Included as Attachment 5 is a copy of the FCC's licenses issued to Cellco for its wireless service in Fairfield County, Connecticut. The FCC's rules permit a licensee to modify its system,

² Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

³ FCC Declaratory Ruling WT Docket No. 08-165.

including the addition of new cell sites, without prior approval by the FCC, as long as, by doing so, the licensee's authorized service area is not enlarged. The addition of the Bridgeport East Facility would not enlarge Cellco's authorized service area in Fairfield County.

B. Public Need and System Design

1. Need for the Bridgeport East Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Fairfield County, Cellco holds an FCC License to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. Pursuant to its FCC Licenses, Cellco has developed and continues to develop a network of cell sites to serve the demand for enhanced wireless services throughout the nation and more specifically, the State of Connecticut.

Cellco currently provides wireless service in north-central Bridgeport and the adjacent town of Stratford, from its North Bridgeport 2, Stratford West, East Bridgeport Relo, Bridgeport Washington Park and Bridgeport cell sites. Plots showing the extent of reliable wireless service in the area reveal "coverage gaps" in each of Cellco's operating frequencies. Significant portions of these coverage gaps will be filled by service from the proposed Bridgeport East Facility. (*See Attachment 6*). More importantly, the proposed Bridgeport East Facility will provide significant capacity relief to Cellco's East Bridgeport Relo facility (Alpha and Gamma sector antennas), Bridgeport Washington Park (Alpha Sector Antennas) and North Bridgeport 2 (Gamma Sector antennas) which are all currently operating beyond their respective capacity limits (a.k.a. exhausting).

2. Cell Site Information

The proposed Bridgeport East Facility will provide reliable wireless service to a 0.8 mile portion of Route 1, a 0.65 mile portion of Route 127 and an overall area of 9.18 square miles at 700 MHz frequencies; a 0.6 mile portion of Route 1, a 0.5 mile portion of Route 127 and an overall area of 6.26 square miles at 1900 MHz frequencies; and a 0.7 mile portion of Route 1, a 0.6 mile portion of Route 127 and an overall area of 7.18 square miles at 2100 MHz frequencies.

The tower and facility compound have been designed to accommodate additional wireless carriers as well as state or local emergency services antennas and equipment if a need exists. Cellco's equipment platform would support radio and related equipment, including (a) receiving, transmitting, switching, processing and performance monitoring equipment; and (b) automatic heating and cooling equipment. Cellco's back-up generator would also be installed on the equipment platform for use during power outages and periodically for maintenance purposes.

The tower and equipment compound would be enclosed by an 8-foot high security fence and gate. Cellco's equipment would be equipped with a silent intrusion and system alarms and will be monitored on a 24-hour basis to receive and to respond to incoming alarms or other technical problems. The Bridgeport East Facility would remain unstaffed, except as required for maintenance. Once the cell site is operational, maintenance personnel generally visit the cell site on a monthly basis. More frequent visits may be required if there are problems with the cell site equipment.

The Bridgeport East Facility will allow Cellco to provide reliable wireless service to a series of coverage gaps, particularly in Cellco's 1900 MHz and 2100 MHz frequencies, along portions of Routes 1 and 127 in the area, and to the surrounding industrial, commercial and

residential areas.

Cellco maintains five (5) existing telecommunications facilities within approximately 1.5 miles of the proposed Bridgeport East Facility. Cellco's existing Bridgeport cell site consists of antennas in a church steeple at 2012 Main Street in Bridgeport and is located approximately 1.4 miles southwest of the proposed Bridgeport East Facility. Cellco's existing North Bridgeport 2 cell site consists of antennas on the roof of a building at 120 Huntington Turnpike in Bridgeport and is located approximately 0.6 miles north of the proposed Bridgeport East Facility. Cellco's existing Stratford West cell site consists of antennas the tower at 23 Stonybrook Road in Stratford and is located approximately 1.4 miles east of the proposed Bridgeport East Facility. Cellco's existing East Bridgeport Relo cell site consists of antennas on the roof of the building at 267 Grant Street in Bridgeport and is located approximately 1.2 miles southeast of the proposed Bridgeport East Facility. Cellco's existing Bridgeport Washington Park cell site consists of antennas on the roof of the building at 480 Barnum Avenue in Bridgeport and is located approximately 1.2 miles south of the proposed Bridgeport East Facility.

Plots showing coverage from Cellco's existing facilities in the area, alone and together with coverage from the proposed Bridgeport East Facility, are included as Attachment 6.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Bridgeport East Facility, in particular, have been designed and developed to allow Cellco to achieve and to maintain high quality, reliable wireless service. The system design is capable of orderly expansion and is compatible with other wireless systems. The resulting quality of service compares favorably with the quality of service

provided by conventional wireline telephone service. The wireless system is designed to assure a true cellular configuration of base transmitters and receivers in order to cover the proposed service area effectively while providing the highest quality of service possible.

Mobile telephone switching offices (“MTSOs”) in Windsor and Wallingford are interconnected and operate Cellco’s wireless systems in Connecticut as a single network, offering the subscriber uninterrupted use of the system while traveling throughout the State. This network is further interconnected with fiber optic networks, local exchange company and long distance carrier networks. Cellco has designed its wireless system to conform with applicable standards and constraints for wireless systems and to minimize the need for additional cell sites in the absence of additional demand or unforeseen circumstances.

b. Cellular System Equipment

The key elements of the cellular system are Cellco’s two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller equipment. This equipment is capable of expanding in modules to meet system growth needs. The cell site equipment primarily provides for message control on the calling channels; call set-up and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test demand; data from the wireless units in both directions and on all channels; scan receiver control; transmission of power control commands rescanning of all timing and commands and voice channel assignment.

In addition to the ground-mounted radio equipment, Cellco intends to install twelve (12) panel-type transmit/receive antennas (three (3) model JAHH-65B-R3B, 700 MHz antennas; three

(3) model JAHH-65B-R3B, 850 MHz antennas; three (3) model JAHH-65B-R3B, 1900 MHz antennas; and three (3) model JAHH-65B-R3B, 2100 MHz antennas). Cellco will also install a total of nine (9) remote radio heads behind its antennas, two (2) HYBRIFLEX™ fiber optic antenna cables and one (1) GPS antenna. Back-up power to the Bridgeport East Facility will be provided by a 25 kW natural gas-fueled generator. Specifications for Cellco's antennas, remote radio heads, antenna cables and back-up generator are included in Attachment 7.

4. Technological Alternatives

Pursuant to its FCC licenses, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no equally effective technological alternatives that would allow Cellco to provide its wireless service to the area than those described in this Application. In fact, Cellco's wireless system represents state-of-the-art technology offering high-quality wireless service. Cellco is aware of no viable and currently available alternatives to its system design for carriers licensed by the FCC.

C. Site Selection and Tower Sharing

1. Cell Site Selection

Cellco's goal in selecting cell sites, like the one described above, is to locate a facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact. Cellco has determined that the proposed Bridgeport East Facility satisfies this goal and would help resolve existing coverage and capacity problems in the area and provide high-quality reliable wireless service along portions of Routes 1 and 127 in the area, and to the surrounding industrial, commercial and residential land uses in eastern Bridgeport and western Stratford.

The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area or ring established by Cellco's Radio Frequency Engineers and network designers. In any search area, Cellco first examines the use of existing towers or other sufficiently tall structures that might help satisfy its wireless service objectives. Cellco currently maintains five (5) wireless telecommunications facilities within approximately 1.5 miles of the Bridgeport East Facility location. Each of these existing facilities will, to some extent, interact with the proposed Bridgeport East Facility and are identified on the coverage maps included in Attachment 6. Several of these adjacent cell tower sites are currently in need of significant capacity relief in and near the designated Bridgeport East search area. Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the designated Bridgeport East search area. Cellco initiated a site search process for the Bridgeport East cell site and identified the property at 380 Horace Street as a viable candidate for a cell site. Additional site search efforts were undertaken by Construction Services of Branford ("CSB") Tarpon. Cellco determined that an antenna centerline height of 90 feet at the Property would satisfy its wireless service objectives in the area. The Site Search Summary (Attachment 8) together with the site information contained in Attachment 1 support Cellco's position that the site selected represents the most feasible alternative of the sites investigated.

2. Tower Sharing

Tarpon will design the facility tower and compound to be shared by a minimum of three (3) wireless carriers, and the City, or local emergency service providers, if a need exists. The tower itself will be designed to be extended if the need exists in the future. This type of tower sharing

arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future. As of the date of this filing, no other carrier nor the City of Bridgeport have expressed any interest in the Bridgeport East Facility.

3. Overall Costs and Benefits

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless services in eastern portions of Bridgeport. The Bridgeport East Facility would be a part of a communications system that addresses the public need identified by the FCC and the United States Congress for high-quality, competitive wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in the future. The overall costs to the Applicant for development of the proposed cell site are set forth in Section III.D. of the Application.

4. Environmental Compatibility

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the Council is required to find and to determine, among other things, the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, on, and conflicting with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish and wildlife.

a. Primary Facility Impact is Visual

The wireless system of which the proposed Bridgeport East Facility would be a part has

been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower and the location of buildings and roadways in a “sight line” toward the tower. Similarly, visual impact of a tower facility can be further reduced through the proper use of alternative tower structures; so-called “stealth or disguised installations.” Where appropriate, telecommunications towers camouflaged as trees, for example, could help to further reduce visual impacts associated with these structures. Attachment 9 contains Visibility Analysis prepared by All-Points Technology Corporation (“APT”) for the Bridgeport East Facility. The Visibility Analysis assesses the visual impact of the proposed 90-foot tower on the surrounding areas and includes photographic simulations for the Council’s review and consideration.

According to the Visibility Analysis, areas where the top portion of the tower would be visible above the tree canopy comprise approximately 41 acres or 0.51% of the 8,042 acre study area. Year-round visibility of the Bridgeport East Facility tower is generally limited to locations within about 0.25 miles of the cell site. When the leaves are off the trees, seasonal views, through intervening trees and branches are anticipated to occur in some locations within an area of approximately 40 additional acres around the tower site.

There are 141 residences within 1,000 feet of the Bridgeport East Facility. The closest off-site residence is located approximately 111 feet to the west at 110 Kingsbury Road.

Weather permitting, the Applicant will raise balloons with a diameter of at least three (3)

feet at the Bridgeport East Facility location on the day of the Council’s hearing on this Application, or at a time otherwise specified by the Council.

b. Environmental Reviews and Agency Comments

Section 16-50j of the General Statutes requires the Council to consult with and to solicit comments on the Application from the Commissioners of the Departments of Energy and Environmental Protection, Public Health, Public Utilities Regulatory Authority, Economic Development, and Transportation, the Council on Environmental Quality, and the Office of Policy and Management, Energy Division. In addition to the Council’s solicitation of comments, Tarpon and Cellco, as a part of the National Environmental Policy Act (“NEPA”) Checklist, solicits comments on the proposed cell site from the U.S. Department of the Interior, Fish and Wildlife Service (“USFWS”), Environmental and Geographic Information Center of the Connecticut Department of Energy Environmental Protection (“DEEP”) and the Connecticut Historical Commission, State Historic Preservation Officer (“SHPO”). Information on the USFWS and DEEP reviews regarding impacts on known populations of Federal or State Endangered, Threatened or Special Concern Species occurring at the proposed site are included in Attachment 10.

(1) USFWS & CTDEEP NDDB Reviews

According to a letter dated March 3, 2016, the USFWS determined that the project may effect, but is not likely to adversely effect, the federally threatened *Northern Long-Eared Bat*.

The CTDEEP Natural Diversity Data Base determined that the proposed facility will not have a negative impact on any State listed species. (*See* USFWS & CTDEEP Compliance Determinations – Attachment 10).

(2) Wetlands Investigation

As discussed in Section III.D.5.d. below, the development of the Bridgeport East Facility will have no direct impact on wetlands, the closest of which is located on an adjacent parcel approximately 150 feet to the east of the proposed Bridgeport East Facility. The closest on-site wetland area is approximately 500 feet to the southeast. Cellco does not anticipate that the development of the proposed facility will adversely impact these wetland resources. A Wetland Inspection report is included in Attachment 11.

(3) Vernal Pool Analysis

In the northwest portion of the nearest off-site wetland area, there appears to be a cryptic style vernal pool approximately 165 feet from the proposed tower site. Construction of the Bridgeport East Facility would not result in any direct physical impacts to the vernal pool. Development of the Bridgeport East Facility would also result in a de minimis increase in development within the vernal pool's critical terrestrial habitat and will not alter the hydrology of the vernal pool. Following the implementation of a vernal pool protection plan, the proposed development of the Bridgeport East Facility will not impact the nearby vernal pool resources. A Vernal Pool Analysis is included in Attachment 12.

(4) State Historic Preservation Officer

According to the Deputy State Historic Preservation Officer ("SHPO"), the proposed Bridgeport East Facility will have "no adverse effect" on site eligible for listing on the National Register of Historic Places. A copy of the SHPO's Determination is included in Attachment 13.

c. Non-Ionizing Radio Frequency Radiation

The FCC has adopted a standard for exposure to Radio Frequency ("RF") emissions from

telecommunications facilities like those proposed in this Application. To ensure compliance with the applicable standards, Cellco has performed a worst-case maximum power density calculation for the proposed cell site according to the methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65, Edition 97-01 (August 1997) (“OET Bulletin 65”). The calculation is a conservative, worst-case approximation for RF emissions at the closest accessible point to the antennas, in this case the base of the tower, and assumes that all antennas are transmitting simultaneously, on all channels, at full power. Even under these absolute worst-case conditions, the calculations indicate that the maximum permissible exposure level for Cellco’s 700, 1900 and 2100 MHz antennas would remain well below (48.89%) the FCC’s Standard. (*See Attachment 14*). Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations.

d. Other Environmental Issues

No sanitary facilities are required for the Bridgeport East Facility. The operations at the approved Bridgeport East Facility will not cause any significant air, water, noise or other environmental impacts, or hazard to human health.

Based on agency comments received and field investigations by the Cellco project team, the Applicant submits that the Bridgeport East Facility will have no significant adverse effect on scenic, natural, historic or recreational features, and that none of the potential effects alone or cumulatively with other effects is sufficient reason to deny this Application.

5. Consistency with Local Land Use Controls

The Council Application Guide for Community Antenna Television and Telecommunication Facilities, as amended in July 2012, requires the inclusion of a narrative

summary of the project’s consistency with the Town’s Plan of Conservation and Development (the “Plan”) and Zoning Regulations, as well as a description of planned and existing uses of the site location and surrounding properties.

a. Planned and Existing Land Uses

The proposed Bridgeport East Facility is located on an approximately 13.7 acre industrial parcel owned by MDL Realty LLC. The Property is located in Bridgeport’s Light Industrial (I-L) zone district and is used for manufacturing purposes.

b. Plan of Conservation and Development

The City of Bridgeport Plan of Conservation & Development (March 2008) (the “Plan”), recognizes the need for “hi-tech” wireless systems and encourages the provision of wireless services throughout the City. The proposed Bridgeport East Facility will help improved wireless service in Bridgeport as stated in the Plan. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the City’s Zoning Map, the Property is located in the Light Industrial zone. The Bridgeport Zoning Subdivision Regulations recognize that the Council maintains exclusive jurisdiction over the siting of telecommunications towers. According to Section 12-14, the City regulates the installation of telecommunications antennas and related equipment on, over or in buildings. Four (4) copies of the Bridgeport Zoning & Subdivision Regulations were filed, in bulk, with the Council.

d. Inland Wetland and Watercourse Regulations

The Bridgeport Inland Wetlands and Watercourses Regulations (the “IWW Regulations”)

define Regulated Activity as any operation within, or use of, a wetland or watercourse including a 100-foot upland review area. Four (4) copies of the Bridgeport IWW Regulations were filed, in bulk, with the Council.

Dean Gustafson, Professional Soil Scientist with APT, conducted a field investigation and completed a Wetland Inspection report for the proposed Bridgeport East Facility. The closest wetland area to the tower site is located approximately 150 feet to the east of the proposed cell site. The Wetland Inspection report is included in Attachment 11.

In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council for Soil and Water Conservation, adequate and appropriate soil erosion and sedimentation control measures will be established and maintained throughout the cell site construction period. In addition, the Applicant will employ appropriate construction management practices to ensure that no pollutants would be discharged to any nearby watercourse or wetland areas or to area groundwater during the construction process.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Map Numbers 090001 and C0433G (Revised – July 8, 2013) the proposed facility would be located in Flood Zone X, an area outside the 500 year flood zone. A copy of the FIRM is also included in Attachment 15.

6. Local Input

Section 16-50l(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On August 28, 2015, Cellco representatives met with Max Perez, Senior Economic Development Associate for the City of Bridgeport (as designee for then – Mayor Bill Finch) to commence the ninety (90) day municipal consultation process. Mr. Perez received

copies of technical information summarizing Cellco's plans to establish a telecommunications facility as described above. At this meeting, Cellco discussed, in detail, the aspects of the proposed Bridgeport East Facility, the site location being considered, the need for wireless service improvements in Bridgeport and the Connecticut Siting Council application process. Mr. Perez suggested that the Applicant reach out to the City's Neighborhood Revitalization Director Deborah Thomas-Sims to discuss the tower proposal and, if needed, to arrange for a neighborhood meeting. The Applicant's representatives met with Ms. Thomas-Sims on November 2, 2015 to discuss the Bridgeport East Facility proposal. Ms. Thomas-Sims suggested that a neighborhood meeting might be appropriate and suggested that Tarpon investigate the property to the north as an alternative. (See Attachment 8 Site Search Summary – Site No. 4). This site was investigated and was deemed to be unsuitable. Following that investigation, Tarpon representatives have attempted to re-connect with Ms. Thomas-Sims to discuss the status of the proposal. Those efforts have been unsuccessful. In January 6, 2016, Tarpon sent Ms. Thomas-Sims a certified letter, to follow up on prior discussions and attempt to schedule a date for a neighborhood meeting. Ms. Thomas-Sims did not respond.

On June 29, 2017, and again on September 25, 2017, counsel for the Applicant reached out to Edward Adams and Daniel Roach, in Mayor Ganim's office to discuss the Bridgeport East tower proposal. The Applicant offered to meet with the Mayor's representatives about the proposal. No one from the Mayor's office expressed any interest in meeting to discuss the tower proposal.

7. Consultations With State and Federal Officials

Attachments 10, 13, 15 and 16 and Section III.C. of the Application describes consultations with state and federal officials regarding the proposed Bridgeport East Facility.

a. Federal Communications Commission

FCC approval of a particular tower site is not required where the authorized service area of the licensed carrier is not enlarged. The FCC did not, therefore, review this particular proposal.

b. Federal Aviation Administration

On October 22, 2015, the Federal Aviation Administration (“FAA”) issued a “Determination of No Hazard to Air Navigation” for the proposed Bridgeport East tower. No obstruction marking or lighting is required nor will be proposed. A copy of the October 22, 2015 FAA Determination is included in Attachment 16.⁴

c. United States Fish and Wildlife Service

See Section III.C.4.b.(1) above.

d. Connecticut Department of Energy and Environmental Protection

(1) Environmental and Geographic Information Center

See Section III.C.4.b.(1) above.

(2) Bureau of Air Management

Under normal operating conditions, the Cellco equipment at the Bridgeport East Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a natural gas-fueled generator to provide emergency back-up power. Cellco’s back-up generator will be managed to comply with the “permit by rule” criteria established by the Connecticut Department of Energy and Environmental Protection (“DEEP”) Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b, and therefore is exempt from general air permit

⁴ The October 22, 2015 FAA Determination expired on April 22, 2017. Tarpon has re-filed with the FAA and anticipates the issuance of a similar determination shortly. A copy of the new determination will be submitted to the Council as soon as it is received.

requirements.

e. **Connecticut State Historic Preservation Officer**

See Section III.C.4.b.(3) above.

D. Estimated Cost and Schedule

1. Overall Estimated Costs

The total estimated cost of construction for the Bridgeport East Facility is \$540,000. This estimate includes:

(1)	Cell site radio equipment of approximately	\$300,000
(2)	Tower, foundation, coax and antenna costs of approximately	115,000
(3)	Power and Telco systems costs of approximately	30,000
(4)	Equipment platform costs of approximately	35,000
(5)	Miscellaneous costs (including site preparation and installation) of approximately	60,000

2. Overall Scheduling

Site preparation and engineering would commence following Council approval of the Development and Maintenance (“D&M”) Plan and are expected to be completed within two to four weeks. Due to the delivery schedules of the manufacturers, installation of the building and installation of the tower are expected to take an additional two to four weeks. Equipment installation is expected to take an additional two weeks after installation of the building and installation of the tower. Cell site integration and system testing is expected to require two weeks after equipment installation.

IV. CONCLUSION

Based on the facts contained in this Application, Cellco submits that the establishment of the Bridgeport East Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the City of Bridgeport and throughout Fairfield County, as determined by the FCC and the United States Congress, and a competitive framework for providing such service has been established by the FCC and the Telecommunications Act of 1996. Cellco submits that the need for these services, in general, and the Bridgeport East Facility, in particular, far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, Cellco respectfully requests that the Council approve this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Bridgeport East Facility.

Respectfully submitted,

TARPON TOWERS II, LLC AND
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS

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