

Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



POMFRET CENTER
72 RAGGED HILL ROAD
POMFRET, CONNECTICUT

DOCKET NO. _____

JULY 9, 2018

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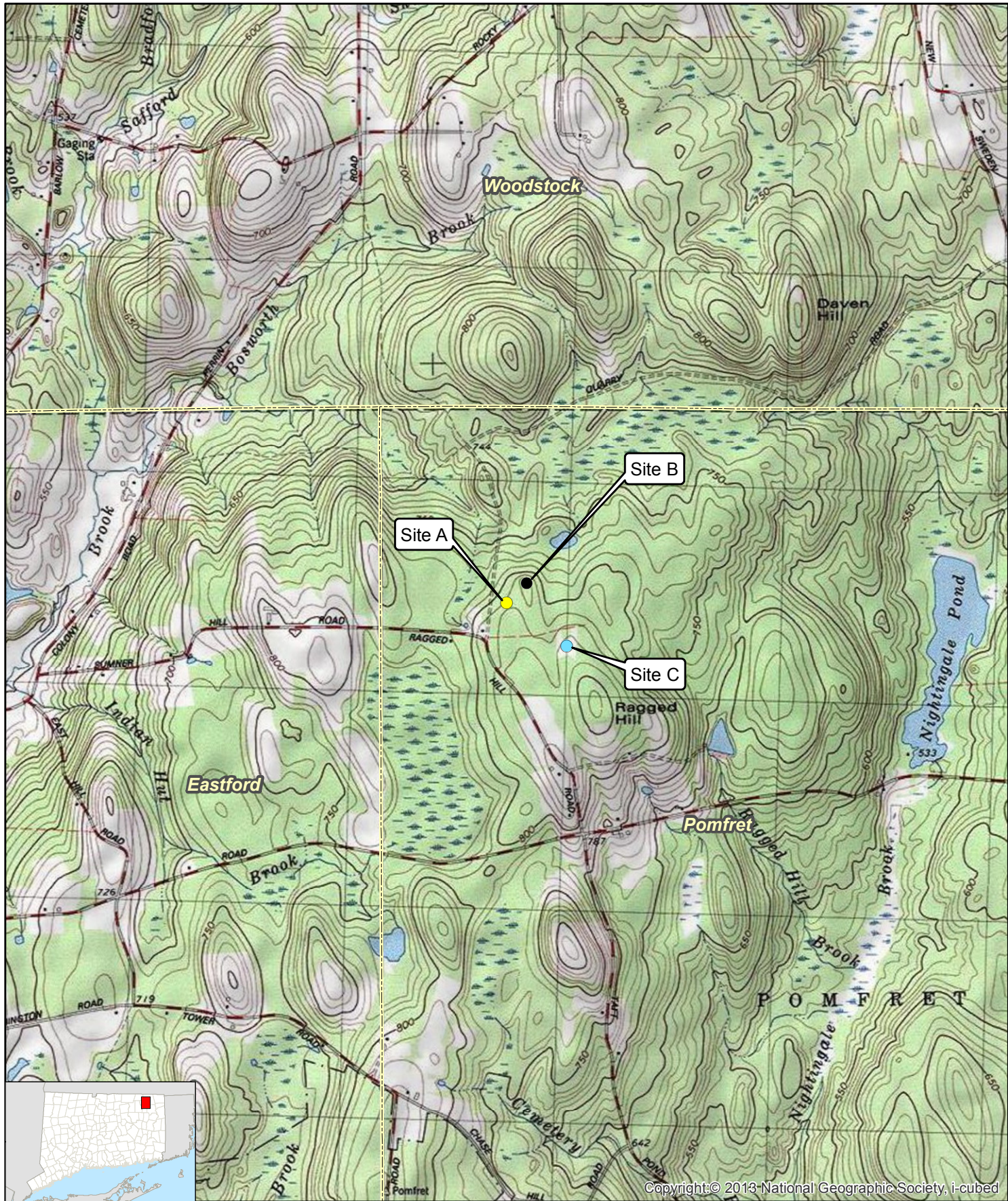
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1. Pomfret Center Facility – Factual Summary and Project Plans
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5. Federal Communications Commission Licenses
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EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 627-acre parcel at 72 Ragged Hill Road in Pomfret, Connecticut (the “Property”). The parcel is owned by Raynham Incorporated. Cellco refers to this cell site as its “Pomfret Center Facility”. The Pomfret Center Facility will provide improved wireless voice and data services in northwest portions of Pomfret, as well as portions of Woodstock and Eastford, Connecticut.

Cellco proposes to construct a monopole tower within a 50’ x 50’ fenced compound at one of three alternative locations in the westerly portion of the Property. The alternate Site A and Site B towers would extend to a height of 150 feet. The alternate Site C tower would extend to a height of 130 feet. Cellco would install six (6) panel-type antennas and six (6) remote radio heads on an antenna platform at the top of the tower. Cellco’s antennas would extend approximately four (4) feet above the top of the tower. Radio equipment, a battery cabinet and a back-up generator would be located on a 10’ x 16’ concrete equipment pad, with a steel canopy roof, within the facility compound. Vehicular access would extend from Swedetown Road a distance of approximately 260 feet to Site A; approximately 675 feet to Site B; and approximately 2,020 feet to Site C. To the extent possible, Cellco would utilize and make improvements to existing logging roads on the Property to limit site disturbance. Utilities would extend underground from existing service along Swedetown Road along each alternative access driveway.



Legend

- Proposed Site Locations**
- Site A
 - Site B
 - Site C
- Municipal Boundary

Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrangle Map, Eastford, CT (1983)
 Map Scale: 1:24,000
 Map Date: May 2018



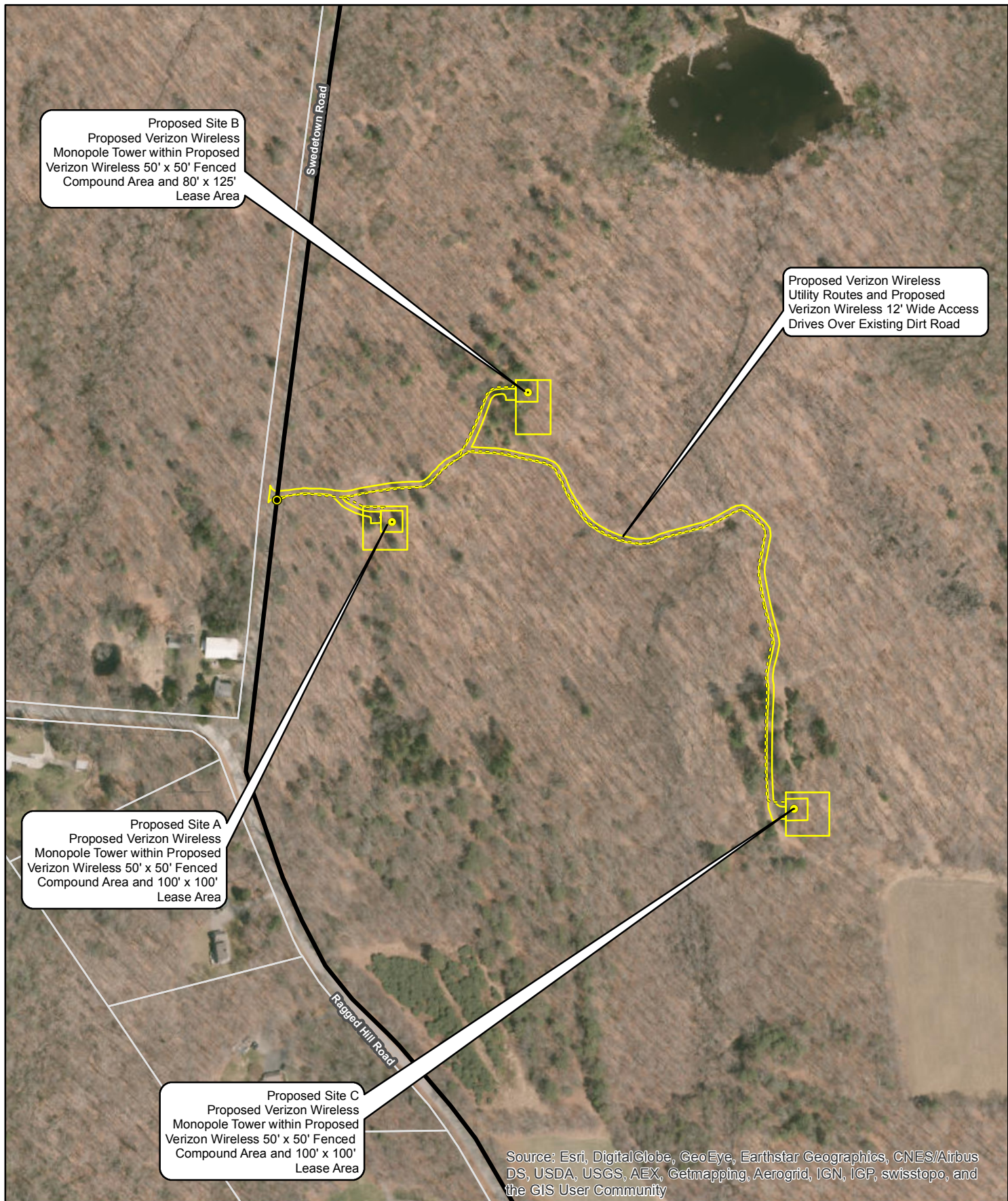
2,000 1,000 0 2,000
 Feet

Site Location Map

Proposed Wireless
 Telecommunications Facility
 Pomfret Center CT
 72 Ragged Hill Road
 Pomfret Center, Connecticut

verizon

ALL-POINTS
 TECHNOLOGY CORPORATION



Legend

- Proposed Verizon Wireless Monopole
- Proposed Verizon Wireless Facility Layout
- - - Proposed Verizon Wireless Power and Telco Service
- Proposed Verizon Wireless Utility Pole
- ▭ Subject Property
- Approximate Parcel Boundary (CTDEEP)

Map Notes:
Base Map Source: ESRI World Imagery
Map Scale: 1 inch = 300 feet
Map Date: April 2018



Site Schematic

Proposed Wireless Telecommunications Facility
Pomfret Center CT
72 Ragged Hill Road
Pomfret Center, Connecticut

verizon

ALL-POINTS
TECHNOLOGY CORPORATION

**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	:	
72 RAGGED HILL ROAD IN POMFRET,	:	
CONNECTICUT	:	JULY 9, 2018

**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 Cellco Partnership d/b/a Verizon Wireless (“Cellco” or 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 a 627-acre parcel at 72 Ragged Hill Road in Pomfret, Connecticut (the “Property”). Cellco identifies this cell site as its “Pomfret Center Facility”. The proposed Pomfret Center Facility will consist of a new monopole tower within a 50’ x 50’ fenced compound. Cellco would install its antennas and remote radio heads on an antenna platform at the top of the tower. Cellco’s

equipment cabinets and a back-up generator will be installed on a concrete pad beneath a canopy roof structure.

To address concerns raised by neighboring property owners during the municipal consultation period, Cellco has received permission from the Property owner to present the Council with three (3) alternative cell site locations on the Property. Details about each alternative location are provided below.

Included in this Application, as Attachment 1 is a factual summary and project plans showing the three alternative cell site locations, identified as Site A, Site B, and Site C. 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

Cellco is a Delaware Partnership with an administrative office located at 20 Alexander Drive, Wallingford, CT 06492. 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:

Cellco Partnership d/b/a Verizon Wireless
20 Alexander Drive
Wallingford, CT 06492
Attention: Andrew Candiello

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

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

C. Application Fee

The estimated total construction cost for the Pomfret Center 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 16-50l(b)

Copies of this Application have been mailed to municipal, regional, state and federal officials, pursuant to C.G.S. Section 16-50l(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 Cellco's intent to submit this Application was published on July 5 and July 6, 2018, by Cellco in *The Bulletin* pursuant to C.G.S. Section 16-50l(b). A copy of the legal notice is included in Attachment 3. A copy of an Affidavit of Publication will be forwarded to the Council as soon as it is available.

Attachment 4 contains a certification that notice of Cellco'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 16-50l(b), as well as a list of the property owners to whom such notice was sent and a sample notice letter, including attachments.

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

The purpose of this section is to provide an overview and general description of the proposed Pomfret Center 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 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 requirement 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 national 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 (E-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 Presidential 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 policy¹ 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

¹ Connecting America: The National Broadband Plan, Federal Communications Commission (2010).

decisions on wireless facilities.² 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-14-153) and were specifically designed to accelerate broadband deployment by improving the efficiencies of the wireless siting process.

Included in Attachment 5 is a copy of the FCC's authorization issued to Cellco for its wireless service in Connecticut. The FCC's rules permit a licensee to modify its system, including the addition of new cell sites, without prior approval by the FCC, as long as the licensee's authorized service area is not enlarged. The Pomfret Center Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Pomfret Center Facility

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Connecticut, Cellco holds FCC Licenses to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges. Initially, Cellco intends to deploy its 700 MHz and 2100 MHz service at the Pomfret Center Facility. 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 portions of Pomfret and the surrounding towns from its existing Pomfret East, Brooklyn West, Ashford, Ashford North, Eastford,

² FCC Declaratory Ruling WT Docket No. 08-165.

Westford, Union West, Woodstock NW, Coatney Hill and Woodstock Relo cell sites. Plots showing the extent of reliable wireless service in the area reveal significant “coverage gaps” in Cellco’s 700 MHz and 2100 MHz³ operating frequencies. Significant portions of these coverage gaps, particularly in northwest Pomfret, southwest Woodstock and northeast Eastford, will be filled by service from the proposed Pomfret Center Facility. (See Attachment 6).

2. Proposed Cell Site Information

The proposed Pomfret Center Facility would be located in the northwesterly portion of an approximately 627-acre parcel at 72 Ragged Hill Road. The Property is owned by Raynham Inc. and is used for residential and agricultural purposes. In response to concerns raised by adjoining landowners to the west, Cellco is asking the Council to consider three (3) alternative cell site locations on the Property.

a. Site A

The Site A facility is the original tower location presented to the Town in Cellco’s Technical Report and is located approximately 260 feet east of Swedetown Road. At Site A, Cellco would construct a 150-foot self-supporting monopole telecommunications tower within a 50’ x 50’ fenced compound and 100’ x 100’ leased area. Cellco would install a total of six (6) panel-type antennas and six (6) remote radio heads on a triangular antenna platform at the top of the tower. Cellco’s antennas will extend approximately four (4) feet above the top of the tower. Equipment associated with Cellco’s antennas, including a back-up battery cabinet and a 20 kW diesel-fueled back-up generator would be located near the base of the tower within the facility compound.

³ Cellco currently provides very limited service at 2100 MHz in the area surrounding the proposed Pomfret Center Facility. (See 2100 MHz plots in Attachment 6).

Vehicular access to Site A would extend from Swedetown Road over a portion of an existing dirt driveway, then over a new gravel driveway extension a total distance of approximately 260 feet. Utilities will extend from existing service along Swedetown Road.

The proposed Site A facility would provide reliable wireless service to an approximately 1.7 mile portion of Route 44; an approximately 3.6 mile portion of Route 244; an approximately 3.4 mile portion of Route 198, and an overall area of 20 square miles at 700 MHz frequencies. As illustrated on the coverage maps included in Attachment 6, the overall area of 2100 MHz service is limited to approximately 1.15 square miles and would not reach any of the major roads in the area.

b. Site B

The Site B facility is located approximately 475 feet northeast of Site A and approximately 570 feet east of Swedetown Road. At Site B, Cellco would construct a 150-foot self-supporting monopole telecommunications tower within a 50' x 50' fenced compound and 125' x 80' leased area. Cellco would install a total of six (6) panel-type antennas and six (6) remote radio heads on a triangular antenna platform at the top of the tower. Cellco's antennas will extend approximately four (4) feet above the top of the tower. Equipment associated with Cellco's antennas, including a back-up battery cabinet and a 20 kW diesel-fueled back-up generator would be located near the base of the tower within the facility compound.

Vehicular access to Site B would extend from Swedetown Road over an existing dirt driveway, then over a new gravel driveway extension a total distance of approximately 675 feet. Utilities will extend from existing service along Swedetown Road.

The proposed Site B facility would provide reliable wireless service to an approximately

1.0 mile portion of Route 44; an approximately 3.0 mile portion of Route 244; an approximately 2.4 mile portion of Route 198, and an overall area of 16 square miles at 700 MHz frequencies. As illustrated on the coverage maps included in Attachment 6, the overall area of 2100 MHz service is limited to approximately 1.14 square miles and would not reach any of the major roads in the area.

c. Site C

The Site C facility is located approximately 1,200 feet southeast of the Site A location and approximately 1,300 feet east of Ragged Hill Road. At Site C, Cellco would construct a 130-foot self-supporting monopole telecommunications tower within a 50' x 50' fenced compound and 100' x 100' leased area. Cellco would install a total of six (6) panel-type antennas and six (6) remote radio heads on a triangular antenna platform at the top of the tower. Cellco's antennas will extend approximately four (4) feet above the top of the tower. Equipment associated with Cellco's antennas, including a back-up battery cabinet and a 20 kW diesel-fueled back-up generator would be located near the base of the tower.

Vehicular access to Site C would extend from Swedetown Road over a portion of an existing dirt driveway, then over a new gravel driveway extension a total distance of approximately 2,020 feet to the Site C location. Utilities will extend from existing service along Swedetown Road.

The proposed Site C facility would provide reliable wireless service to an approximately 2.4 mile portion of Route 44; an approximately 3.0 mile portion of Route 244; an approximately 2.2 mile portion of Route 198, and an overall area of 21 square miles at 700 MHz frequencies. As illustrated on the coverage maps included in Attachment 6, the overall area of 2100 MHz

service is limited to approximately 0.81 square miles and would not reach any of the major roads in the area.

The proposed Pomfret Center Facility will interact with ten (10) of Cellco's existing telecommunications facilities, all located within nine (9) miles of the Property. These surrounding cell sites include:

- *Pomfret East* – antennas on an existing tower at 398 Pomfret Street in Pomfret, located approximately 4.3 miles east of the proposed Pomfret Center Facility;
- *Brooklyn West* - antennas on an existing tower at 118 Grant Hill Road in Brooklyn, located approximately 7.9 miles south of the proposed Pomfret Center Facility;
- *Ashford CT Relo*– antennas on an existing tower at 353 Pumpkin Hill Road in Ashford, located approximately 5.9 miles southwest of the proposed Pomfret Center Facility;
- *Ashford North* – antennas on an existing tower at 174 Ashford Center Road in Ashford, located approximately 6.1 miles southwest of the proposed Pomfret Center Facility;
- *Eastford*– antennas on an existing tower at 35 Old Route 44 in Eastford, located approximately 2.8 miles southwest of the proposed Pomfret Center Facility;
- *Westford* – antennas on an existing tower at 264 Janoski Road in Ashford, located approximately 8.7 miles northwest of the proposed Pomfret Center Facility;
- *Union West*– antennas on an existing tower at 1050 Buckley Highway in Union, located approximately 8.7 miles northwest of the proposed Pomfret Center

Facility;

- *Woodstock NW*— antennas on an existing tower at 40 Sherman Road in Ashford, located approximately 5.8 miles northwest of the proposed Pomfret Center Facility;
- *Coatney Hill*— antennas on an existing tower at 215 Coatney Hill Road in Woodstock, located approximately 4.0 miles north of the proposed Pomfret Center Facility; and
- *Woodstock Relo*— antennas on an existing tower at 87 West Quassett Road in Woodstock, located approximately 2.9 miles northwest of the proposed Pomfret Center Facility.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Pomfret Center 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 the local exchange company and long distance carrier networks.

Cellco has designed its wireless system in conformity with applicable standards and constraints for wireless systems. Cellco's system is also designed to minimize the need for additional cell sites in the absence of additional demand or unforeseen circumstances.

b. Cell Site Equipment

The key elements of the cellular system are the 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 channel; call setup and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test commands; data from the mobile or portable unit 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 six (6) panel-type transmit/receive antennas; six (6) remote radio heads (RRHs); two (2) HYBRIFLEX™ fiber optic antenna cables; and a GPS antenna. Back-up power to the Pomfret Center Facility will be provided by a back-up battery system and a 20 kW diesel-fueled generator. Specifications for Cellco's antennas, RRHs, antenna cables and generator are included in Attachment 7.

4. Technological Alternatives

Pursuant to authorization by the FCC, Cellco is authorized to provide wireless telecommunications services throughout the State of Connecticut. Cellco submits that there are no

equally effective technological alternatives to the proposal contained herein. In fact, Cellco's wireless system represents state-of-the-art technology offering high-quality 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

The goal of any cell site selection process is to locate a facility in such a manner as to allow the particular wireless carrier to build and to operate a high-quality wireless network with the least environmental impact. The methodology of cell site selection for a wireless system generally limits the search for possible locations to a specific site search area established by Cellco's Radio Frequency (RF) 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 coverage objectives. A list of the existing towers in the area, non-tower structures that may have been considered and alternative parcels evaluated by Cellco's RF Engineers are described above and included in Attachment 8. Cellco currently shares each of the existing surrounding towers, all of which are within approximately nine (9) miles of the Pomfret Center Facility location. These existing sites are identified on the coverage maps included in Attachment 6. Cellco is, however, unable to satisfy its coverage objectives for the Pomfret Center Facility search area from any of these locations.

Cellco also regularly investigates the use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No such non-tower structures of suitable height exist in northwest portions of Pomfret. Cellco initiated a site search process for the Pomfret Center cell site in January of 2009. At that time, Cellco identified the Property as a viable candidate for a

cell site (Site A) and entered into a lease agreement with the owner. Cellco determined that an antenna centerline height of 150 feet at Site A, would satisfy its wireless service objectives in the area. As a result of the municipal consultation process and input from several abutting land owners, the owner of the Property agreed to allow Cellco to present two additional alternative tower locations to this Council. Cellco determined that an antenna centerline height of 150 feet at Site B and 130 feet at Site C would satisfy its wireless service objectives. 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

The Applicant will design the facility tower and compound to be shared by a minimum of three (3) wireless carriers, and the Town, or local emergency service providers, if a need exists. The tower itself could also be designed to be extended up to 20 feet in accordance with past requests from the Council. 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 wireless carrier nor the Town of Pomfret has expressed any interest in the Pomfret Center 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 service in the Town of Pomfret.⁴ The Pomfret Center Facility would

⁴ Businesses and individuals across the country have become much more dependent on wireless services especially in emergency situations. The public safety benefits of wireless telephone service are illustrated by the Connecticut State

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 mobile and portable 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 Pomfret Center 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 site, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower site and the location of buildings and roadways in a “sight line” toward the tower. Attachment 9 contains

Police Enhanced 911 emergency calling system. The E-911 emergency calling system is available statewide to all wireless telephone users. Numerous other emergency service organizations have turned to wireless telephone service for use during natural disasters and severe storms when wireline service is interrupted or unavailable.

Visual Assessment & Photo-Simulations (the “Visual Assessment”) prepared by All-Points Technology Corporation (“APT”) for the Pomfret Center Facility. The Visual Assessment assesses the visual impact of a tower and compound at each of the three (3) alternative locations on the surrounding areas and includes photo-simulations for the Council’s review and consideration.

According to the Visual Assessment the only area where all three alternative tower sites would be visible is from the Hopkins Road area, approximately 1.5 miles northwest of the Property. This was the only photo-location here Site C was visible at all. An area along Quarry Road, approximately 0.8 miles to the north, may provide seasonal views of a Site A or Site B tower. Areas where seasonal views are anticipated include areas along Ragged Hill Road and Swedetown Road immediately west of the Property.

The nearest off-site residence to Site A is located at 50 Swedetown Road, approximately 420 feet to the southwest. The nearest off-site residence to Site B is also located at 50 Swedetown Road, approximately 530 feet to the west. The nearest off-site residence to Site C is located at 123 Ragged Hill Road, approximately 1,500 feet to the west. Weather permitting, the Applicant will raise balloons with a diameter of at least three (3) feet at the Site A, Site B and Site C tower locations 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 Utility 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, Cellco, as a part of its due diligence for compliance with the National Environmental Policy Act ("NEPA") is compiling documentation and comments on the proposed Pomfret Center Facility for future submission to 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").

(1) USFWS & NDDB Compliance Determination

According to the May 5, 2018 USFWS & NDDB Compliance Determination prepared by APT, one federally-listed threatened species is known to occur in the vicinity of the Property documented as the *Northern Long-Eared Bat* ("NLEB"). For the reasons discussed in the attached compliance determination, Cellco submits that the proposed Pomfret Center Facility will not adversely affect the NLEB. Likewise, the CTDEEP has confirmed that no documented occurrences of State-Listed Endangered, Threatened and Special Concern Species occur in the vicinity of the Property and, therefore, the development of the proposed wireless telecommunications facility will not have an adverse impact to any State-listed species. (*See Attachment 10*).

(2) Wetlands and Vernal Pool Analysis

As discussed in more detail in Section III.C.5.d. below, no direct wetland impacts would occur from the development of the proposed facility compounds or access driveways to either the Site A or Site B tower locations. No direct wetland impacts would occur from the development of the proposed Site C facility compound. Certain portions of the proposed access road to the Site C alternative location may result in temporary and/or permanent impacts on wetland resources for

improvements to the proposed access driveway. Details regarding APT's vernal pool analysis and potential impacts are also set forth in Section III.C.5.d. below. (See Wetlands Inspection Report – Attachment 11).

(3) Avian Resources Evaluation

The proposed Pomfret Center Facility (Sites A, B or C towers) is not proximate to any Important Bird Areas and complies with the USFWS Guidelines for minimizing impacts on birds. Cellco, therefore, does not anticipate that the Pomfret Center Facility will impact migratory bird species. (See Avian Resources Evaluation – Attachment 12).

(4) State Historic Preservation Officer

According to a Preliminary Historic Resources Determination prepared by APT for the Pomfret Center Facility, there are no historic resources on or eligible for listing on the State or National Register of Historic Places within one-half mile of the proposed Pomfret Center Facility. (See Attachment 13). As a part of its due diligence for compliance with the National Environmental Policy Act, Cellco will compile information for a future submission to the Connecticut State Historic Preservation Officer ("SHPO"). In keeping with its policy, formal submission to the SHPO will occur once the tower proposed is further along in the siting process.

(5) Agriculture

Farmland soils suitable for agricultural use includes land that is defined as prime or farmland of Statewide or local importance, based on soil type. It identifies the location and extent of the most suitable land for producing food, feed, fiber, forage, and oilseed crops and is available for these uses.⁵ According to the National Cooperative Soil Survey (U.S. Department of

⁵ Connecticut Environmental Conditions Online (CTECO Resource Guide) www.cteco.uconn.edu.

Agriculture, Natural Resources Conservation Service), southwest portions of the Property contain “Prime” and “Statewide Important” Farmland soils. None of these areas will be impacted by construction of the Pomfret Center Facility compound (Site A, Site B or Site C) or gravel access driveway serving each alternative location. (See Farmland Soils Map included in Attachment 14).

c. Non-Ionizing Radio Frequency Radiation

The FCC has adopted standards for exposure to Radio Frequency (“RF”) emissions from telecommunications facilities like those proposed in the Application. To ensure compliance with the applicable standards, Cellco has performed a general power density calculation for the proposed Site A, Site B and Site C alternative tower sites 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 antennas at any of the three alternative tower locations on the Property would remain well below the FCC’s Standard. Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations. Worst-case General Power Density tables for the 150’ tower at Site A and Site B and the 130’ tower at Site C are included in Attachment 15.

d. Other Environmental Issues

No sanitary facilities are required for the Pomfret Center Facility. The operations at the Pomfret Center 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 development of a telecommunications facility at the Property, alternative locations Site A, Site B and Site C, 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 Municipality's Plan of Conservation and Development (the "Plan"), Zoning Regulations, and Wetland 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 Pomfret Center Facility would be located on an approximately 627-acre parcel owned by Raynham Inc.. The Property is zoned Rural Residential ("RR") and is used for residential purposes. The Property is surrounded by low-density residential, vacant wooded areas and agricultural land uses.

b. Plan of Conservation and Development

The Town of Pomfret Master Plan of Conservation & Development (Dated December 21, 2016) (the "Plan"), does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Pomfret Zoning Map, the Property is located in the Rural Residential (RR) zone district. Pursuant to Section 4 of the Pomfret Zoning Regulations, wireless telecommunications facilities, like the one proposed in this Application, are permitted in the RR zone subject to the approval of a Special Permit from the Pomfret Planning and Zoning Commission (“Commission”). Section 12.13 of the Pomfret Zoning Regulations encourages the use of municipally-owned sites and facilities and establishes preferences for the siting of telecommunications facilities. The location of new towers in residential zones is the least preferred option. According to Section 12.13.5 of the Pomfret Zoning Regulations, towers must be setback a distance equal to the height of the tower, plus 50 feet. Each of the proposed tower locations, Site A (150-foot tower), Site B (150-foot tower) and Site C (130-foot tower) satisfies this setback requirement from all property boundaries. The regulations state that towers in residential zones must be a monopole design and may be camouflaged, if appropriate. The tower must also be designed to accommodate at least three (3) additional carriers and constructed in accordance with all applicable structural standards. Cellco submits that, while not subject to local zoning jurisdiction, the proposed Pomfret Center Facility satisfies the requirements of the Pomfret Zoning Regulations.

d. Inland Wetland and Watercourse Regulations

The Pomfret Inland Wetlands and Watercourses Regulations (“Wetland Regulations”) define Regulated Activity as any operation within or use of a wetland or watercourse involving removal or deposition of material, or any obstruction, construction, alteration or pollution, of such wetlands or watercourses. The term “Regulated Area” is defined as the actual wetland or

watercourse and the designated Upland Review Area.⁶ Four (4) copies of the Pomfret Wetland Regulations were filed, in bulk, with the Council. APT completed a thorough Wetland and Vernal Pool Analysis of the Property assessing the potential impact associated with the development of the Site A, Site B and Site C facility locations, as well as the proposed access driveways to each alternative site. A copy of the Wetland and Vernal Pool Analysis is included in Attachment 11. No direct wetland impacts would occur from the development of the proposed compound areas and access driveways to the Site A or Site B tower locations. The closest wetland area to Site A is located approximately 160' to the southeast (Wetland 1). The closest wetland area to Site B is located approximately 140' to the east (Wetland 2). Provided appropriate erosion and sedimentation control measures are installed and maintained during construction in accordance with the 2002 Guidelines for Soil Erosion and Sedimentation Control, no likely adverse impact on these nearby wetland resources is anticipated from the proposed development of a tower site at either Site A or Site B.

No direct wetland impacts would occur from the development of the proposed Site C facility compound. The closest wetland area to Site C is located approximately 90' to the east (Wetland 3). Provided appropriate erosion and sedimentation control measures are installed and maintained during construction, no likely adverse impact to this nearby wetland area is anticipated from the proposed development of the Site C facility compound.

Access to Site C would utilize an existing woods road which Cellco would improve with a 12' wide gravel surface. The current woods road includes an existing wetland crossing

⁶ Upland Review Area is defined to include non-wetland areas within 150 feet of the boundary of a wetland or watercourse and various other areas between 300 and 500 feet from various watercourses and tributaries in Pomfret. None of these watercourses or tributaries are within the upland review setback of any of the three alternative tower locations.

(Wetland 2), a culvert was previously installed at the eastern edge of Wetland 2 conveying water under the woods road. Cellco intends to maintain the existing culvert and make further driveway improvements to access the Site C alternative facility location.

Developing the Site C alternative will require temporary and permanent impacts on wetland resources as a part of the improvement plan for the proposed access driveway. The Wetland and Vernal Pool Analysis also confirms that six (6) potential vernal pools were identified on the Property. No vernal pools, however, would be directly impacted by the proposed development activities associated with either alternative Sites A, B or C. Activities would, however, occur within a critical terrestrial habitat zone as described in the report. The proposed location of site development activity within the vernal pool CHT resulted in the recommendation of certain best management practices to both protect the nearby wetland resources from temporary impacts and avoid unintentional impact or mortality on vernal pool species during construction activity.

According to the Federal Emergency Management Agency Flood Insurance Rate Map ("FIRM"), Community Panel Number 0901630005B (Effective April 17, 1985) the Pomfret Center Facility would be located in Flood Zone C (X-unshaded), an area of minimal risk of flooding. A copy of the FIRM is also included in Attachment 16.

6. Local Input

Section 16-50l(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On or about May 18, 2017, Cellco commenced the ninety (90) day municipal consultation process by submitting technical information about the proposed

telecommunications facility to local officials in the Towns of Pomfret, Eastford and Woodstock.⁷ Efforts to meet directly with Pomfret's First Selectman Craig Baldwin at that time, were unsuccessful. The Pomfret First Selectman did however, ask Cellco to host a Public Information Meeting ("PIM") about the tower proposal. The PIM was held on August 23, 2017 at the Pomfret Senior Center, and was attended by approximately thirty-five (35) residents. At the PIM, Cellco discussed the need for the Pomfret Center Facility and the Council's application process. Neighbors attending the PIM expressed concern with the tower location (Site A) and asked Cellco to consider alternative locations on the Property.

Notice of the PIM was published in the *Putnam Town Crier* on August 3, 2017, and was sent to abutting landowners. A list of the abutting landowners who were notified of the PIM, a copy of the abutters' notice letter and a copy of the PIM Legal Notice is included in Attachment 17.

7. Consultations With State and Federal Officials

Attachments 10, 11, 12, 13, 15 and 17 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Pomfret Center Facility.

a. Federal Communications Commission

The FCC did not review this particular proposal. As discussed above, FCC approval is not required where the authorized service area is not enlarged.

b. Federal Aviation Administration (FAA)

As it does with all of its tower applications, Cellco completed a Federal Airways & Air-Space Summary Report for each of the proposed alternative tower locations to determine if the

⁷ Because the Property is located within 2,500 feet of the Pomfret-Eastford and Pomfret-Woodstock municipal boundaries, copies of the technical information were provided to the First Selectman, Planning and Zoning Commission Chairs and Inland Wetlands Commission Chairs for all three (3) towns.

proposed tower would constitute an obstruction or hazard to air navigation. This analysis has confirmed, pursuant to FAA standards and guidelines, that a tower at either the Site A, Site B or Site C locations would not constitute an obstruction or hazard to air navigation. Therefore, no obstruction marking or lighting would be required. A copy of the Federal Airways and Airspace Summary Reports are included in Attachment 18.

c. United States Fish and Wildlife Service

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

d. Connecticut Department of Energy and Environmental Protection

(1) Natural Diversity Data Base

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

(2) Bureau of Air Management

Under normal operating conditions, the equipment installed at a Pomfret Center Facility would generate no air emissions. During the loss of commercial power and periodically for maintenance purposes, Cellco would utilize a generator to provide emergency back-up power to the proposed cell site. 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.

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 Site A facility is approximately \$520,000.

This estimate includes:

- (1) Cell site radio equipment\$150,000
- (2) Tower60,000
- (3) Generator.....60,000
- (4) Miscellaneous (including site preparation, access, grading)250,000

The total estimated cost of construction for the Site B facility is approximately \$570,000.

This estimate includes:

- (1) Cell site radio equipment\$150,000
- (2) Tower60,000
- (3) Generator.....60,000
- (4) Miscellaneous (including site preparation, access, grading)300,000

The total estimated cost of construction for the Site C facility is approximately \$750,000.

This estimate includes:

- (1) Cell site radio equipment\$150,000
- (2) Tower60,000
- (3) Generator.....60,000
- (4) Miscellaneous (including site preparation, access, grading)480,000

2. Overall Scheduling

Site preparation and engineering would commence following Council approval of Cellco's

Development and Maintenance (“D&M”) Plan and are expected to be completed within two to four weeks. Equipment installation is expected to take an additional four 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 a telecommunications facility at either the Site A, Site B or Site C locations would not have a substantial adverse environmental effect on the Property or the surrounding area. A public need exists for high quality reliable wireless service in portions of the Towns of Pomfret, Woodstock and Eastford, and throughout Windham County, as determined by the FCC and the United States Congress. 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 the Pomfret Center Facility far outweighs any possible environmental effects resulting from the construction of the proposed cell site.

WHEREFORE, Cellco respectfully requests that the Council grant this Application for a Certificate of Environmental Compatibility and Public Need for the proposed Pomfret Center Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS

By: _____

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