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Also admitted in Massachusetts

May 15, 2014

David V. Merchant  
Mayor  
Town of Plymouth  
80 Main Street  
Terryville, CT 06786

Re: **Submission of Technical Information Concerning Proposal to Construct a  
Wireless Telecommunications Facility at 55 Keegan Road, Plymouth  
Connecticut**

Dear Mr. Merchant:

This firm represents Cellco Partnership d/b/a Verizon Wireless ("Cellco"), in its proposal to construct a new wireless telecommunications facility on an approximately 20 acre parcel at 55 Keegan Road in Plymouth. This facility will replace Cellco's existing tower and related facility at 42 South Street, which will be abandoned and removed if the new tower site is approved.

For the purposes of this filing, the proposed telecommunications facility is known as Cellco's "Plymouth West Relo Facility". This technical report is submitted pursuant to Connecticut General Statutes ("Conn. Gen. Stat.") § 16-50l(e), which establishes local input requirements for the siting of a wireless telecommunications facility under the jurisdiction of the Connecticut Siting Council (the "Council").

Correspondence and/or communications regarding the information contained in this report should be addressed to:

Sandy M. Carter, Regulatory Manager  
Verizon Wireless  
99 East River Drive  
East Hartford, CT 06108



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A copy of all such correspondence or communications should also be sent to Cellco's attorneys:

Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597

Cellco intends to submit an application to the Council for a Certificate of Environmental Compatibility and Public Need ("Certificate") for the construction, maintenance and operation of a new wireless telecommunications facility in the Town of Plymouth (the "Town" or "Plymouth"). The Plymouth West Relo facility, like the cell site at 42 South Street it will replace, would interact with Cellco's existing Thomaston Center, Plymouth NW, Plymouth and Thomaston South cell sites.

The Plymouth West Relo cell site would provide enhanced wireless coverage to the area and significant capacity relief to its network in western portions of Plymouth, particularly along portions of Route 262, and in the surrounding residential neighborhoods. Coverage plots for Cellco's existing cell sites in the area, alone and together with the new Plymouth West Relo Facility are included in Attachment 1.

## **Cell Site Information**

The proposed Plymouth West Relo Facility would be located in the westerly portion of an approximately 20 acre parcel at 55 Keegan Road in Plymouth (the "Property"). The Property is owned by Steven A. Westall (the "Landlord") and is located in Plymouth's Residential zone district. The Property is currently vacant and wooded.

Cellco proposes to construct a wireless telecommunications facility at the Property consisting of an 140-foot monopole tower and a 12' x 30' shelter all located within a 50' x 50' fenced compound, within a 100' x 100' leased area. Cellco will install up to fifteen (15) panel-type antennas at the centerline height of 140-feet above ground level ("AGL"). Cellco's antennas may extend to an overall height of approximately 143 feet AGL. Equipment associated with the Cellco's antennas and a diesel-fueled backup generator would be located inside the shelter. Access to the Plymouth West Relo Facility would extend from Keegan Road over a new 12-foot access driveway to the cell site, a distance of approximately 375 feet. Project plans for the Plymouth West Relo Facility are included in Attachment 2.



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**Connecticut Siting Council Jurisdiction**

Municipal jurisdiction over the siting of the proposed telecommunications facility described in this report is pre-empted by provisions of the Public Utilities Environmental Standards Act (“PUESA”), Conn. Gen. Stat. § 16-50g et seq. The PUESA gives exclusive jurisdiction over the location, type and modification of telecommunications towers, to the Council (Conn. Gen. Stat. § 16-50x(a); 16-50i(a)(6)). Accordingly, the telecommunications facility described in this report is exempt from the Town’s land use regulations.

Upon receipt of an application, the Council will assign a docket number and, following a completeness review, set a hearing date. At that time, the Town may choose to become an intervenor or party in the proceeding. Other procedures followed by the Council include serving the applicant and other participants with interrogatories, holding a pre-hearing conference, and conducting a public hearing. The public hearing would be held at a location in the Town. Following the public hearing, the Council will issue findings of fact, an opinion and a decision and order. Prior to construction, the Council will also require the Applicant to submit a development and management plan (“D&M Plan”) which is, in essence, a final site development plan showing the details of the facility including any conditions imposed by the Council. These procedures are also outside the scope of the Town’s jurisdiction and are governed by the Connecticut General Statutes, the Regulations of Connecticut State Agencies, and the Council’s Rules of Practice. If the Council approves the cell site described in this report, Cellco will submit to the Town’s Building Official an application for approval of a local building permit. Under Section 16-50x of the General Statutes, which provides for the exclusive jurisdiction of the Council, the building official must honor the Council’s decision.

**Municipal Consultation Process**

Pursuant to Section 16-50j of the General Statutes, Town officials are entitled to receive technical information regarding the proposed telecommunications facility at least ninety (90) days prior to the filing of an application with the Council. This technical report is provided to the Town in accordance with these provisions and includes information on the need for wireless service in the area; the location of existing wireless facilities in and around Plymouth; details of the proposed facility; the location of alternative sites considered and rejected; the location of schools and commercial day care facilities in the area and the aesthetic impacts of the facility on those schools and day care facilities, if any, a description of the site selection process, and a discussion of potential environmental effects associated with the proposed





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facility.

Not later than sixty (60) days after the initial consultation meeting, the municipality may, in cooperation with the prospective applicant, hold a public information hearing on the facility proposal. If such a hearing is held, the applicant must notify all abutting landowners and publish notice in a newspaper of general circulation in the municipality at least fifteen (15) days prior to the hearing.

Not later than thirty (30) days after the initial consultation meeting, the municipality may present the prospective applicant with alternative sites, including municipal parcels, for its consideration. If not previously considered, these alternatives will be evaluated and discussed in its application to the Council.

Pursuant to Section 16-50~~l~~(e) of the General Statutes, Cellco must provide a summary of the Town's comments and recommendations, if any, to the Council within fifteen (15) days of the filing of an application.

### **Public Need**

The primary purpose for the Plymouth West Relo Facility described above is to provide continuing and enhanced wireless services in the western portions of Plymouth, particularly along Route 262 and the surrounding residential neighborhoods. The proposed replacement facility will provide service to essentially the same area served today by the 42 South Street tower.

### **Environmental Effects**

In our experience, the primary impact of a wireless facility such as the proposed Plymouth West Relo Facility is visual. The visual impact of the proposed facility will vary from place to place around the site location, depending upon factors such as vegetation, topography, distance from the towers, and the location of buildings in the sight-line of the cell site. The Plymouth West Relo Facility will be located in the easterly portion of the Property and will provide coverage comparable to Cellco's existing Plymouth West facility at 42 South Road.

To more fully assess the visual impact of the Plymouth West Relo Facility, Cellco's consultant, All-Points Technology Corporation ("APT") has prepared a Preliminary Visibility Analysis. This analysis indicates that a majority of the year-round visibility of the tower would be limited to the area immediately surrounding the proposed facility location including a very short section of Keegan Road directly adjacent to the Property. (See Attachment 3). A more detailed visual report is being



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prepared and will be included in Cellco's application to the Council.

Pursuant to the provisions of Conn. Gen. Stat. § 16-50p(a)(3)(G), new telecommunications facilities must be located at least 250 feet from schools (defined in C.G.S. §10-154a) and commercial day care facilities (defined in C.G.S. §19a-77(a)(1)) unless the location selected is acceptable to the Town's chief elected official or the Council finds that the facility will not have a substantial adverse effect on the aesthetics or scenic quality of the neighborhood where the school or commercial day care use is located. The proposed Plymouth West Relo tower is not located within 250 feet of any building containing a school or commercial day care facility.

Based on field surveys, Cellco has determined that the construction of the Plymouth West Relo Facility will have no impacts on inland wetlands or watercourses, within or near the tower compound. Cellco anticipates that all other physical environmental effects associated with the proposed facility would be minimal.

#### **Power Density**

The Federal Communications Commission ("FCC") has adopted a standard (the "Standard") for exposure of radio frequency ("RF") emissions from telecommunications facilities like the Plymouth West Relo Facility. To ensure compliance with the Standard, Cellco has performed a worst-case power density calculation for the proposed facility according to the methodology described in FCC Office of Science and Technology Bulletin No. 65 ("OST Bulletin 65"). This calculation is a conservative, worst-case approximation of RF emissions at the closest accessible point to the antenna (i.e., the base of the tower), and with all antennas transmitting simultaneously on all channels at full power. The worst-case calculated RF emissions level for Cellco's antennas at the 140-foot level on the tower would be 26.69% of the FCC Standard. (See Attachment 4.) Actual RF emissions levels from this facility will be far less than these "worst-case" calculations.

#### **Scenic Natural Historic or Recreational Impacts**

To further assess the environmental impacts of the proposed facility, Cellco is working with its consultant team to prepare a National Environmental Policy Act ("NEPA") Environmental Screening Checklist (the "NEPA Checklist") and other related environmental reviews to determine if the facility will have any significant adverse environmental effects. The NEPA Checklist will include information from the Environmental and Geographic Information Center of the Connecticut Department of Energy and Environmental Protection ("DEEP"), the U.S. Fish and





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Wildlife Service (“USFWS”) and the State Historic Preservation Officer (“SHPO”). Copies of the DEEP, USFWS and the SHPO determinations will also be submitted as a part of the Council Application.

### **Site Search Process**

Cellco conducted a search for suitable cell site locations in southeast portions of Plymouth and identified the Property as a site that would satisfy its wireless service objectives in the area. In addition to the proposed location, Cellco identified and investigated alternative facility locations in the area. With the exception of the Property, each of the alternative sites considered were rejected by the landowner who was unwilling to enter into a lease for a cell site or eliminated due to some concerns for significant environmental effects. A complete list of other potential cell sites investigated is included in Attachment 5.

### **Tower Sharing**

As stated above, Cellco intends to build a tower that is capable of supporting its antennas and those of additional wireless telecommunications providers, including Town of Plymouth emergency service providers, if a need exists. Metro PCS, a tenant on the existing South Street tower will relocate its antennas and related equipment to the new tower, if approve. Also, AT&T has expressed an interest in sharing the Plymouth West Relo Facility and has agreed to intervene in the Council application. The provision to share the tower is consistent with the intent of the General Assembly when it adopted Conn. Gen. Stat. § 16-50aa and with Council policy. The availability of space on the proposed tower may reduce, if not eliminate, the need for additional towers in southeast Plymouth for the foreseeable future.

### **Conclusion**

This technical report is submitted in accordance with Conn. Gen. Stat. § 16-50~~l~~ which requires Cellco to supply the Town with information regarding its proposed Plymouth West Relo Facility. This report includes information regarding the site selection process, public need, and the potential environmental impacts of the facility. Cellco submits that its proposed Plymouth West Relo Facility would not have any significant adverse environmental effects. Moreover, Cellco submits that the public need for high quality wireless service, and a competitive framework for providing such service has been determined by the FCC to be in the public interest and that such public need far outweighs any perceived environmental effects of the proposed facility.

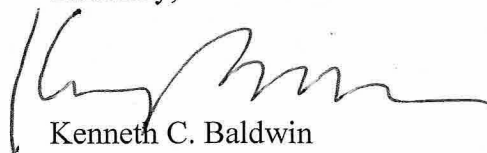


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Please contact me if you have any additional questions regarding the proposed facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Baldwin', written over a horizontal line.

Kenneth C. Baldwin

Enclosures  
Copy to:  
Sandy M. Carter

