

Connecticut Siting Council

APPLICATION OF CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS



BRIDGEPORT NE
541 BROADBRIDGE ROAD
BRIDGEPORT, CONNECTICUT

DOCKET NO. _____

MARCH 24, 2017

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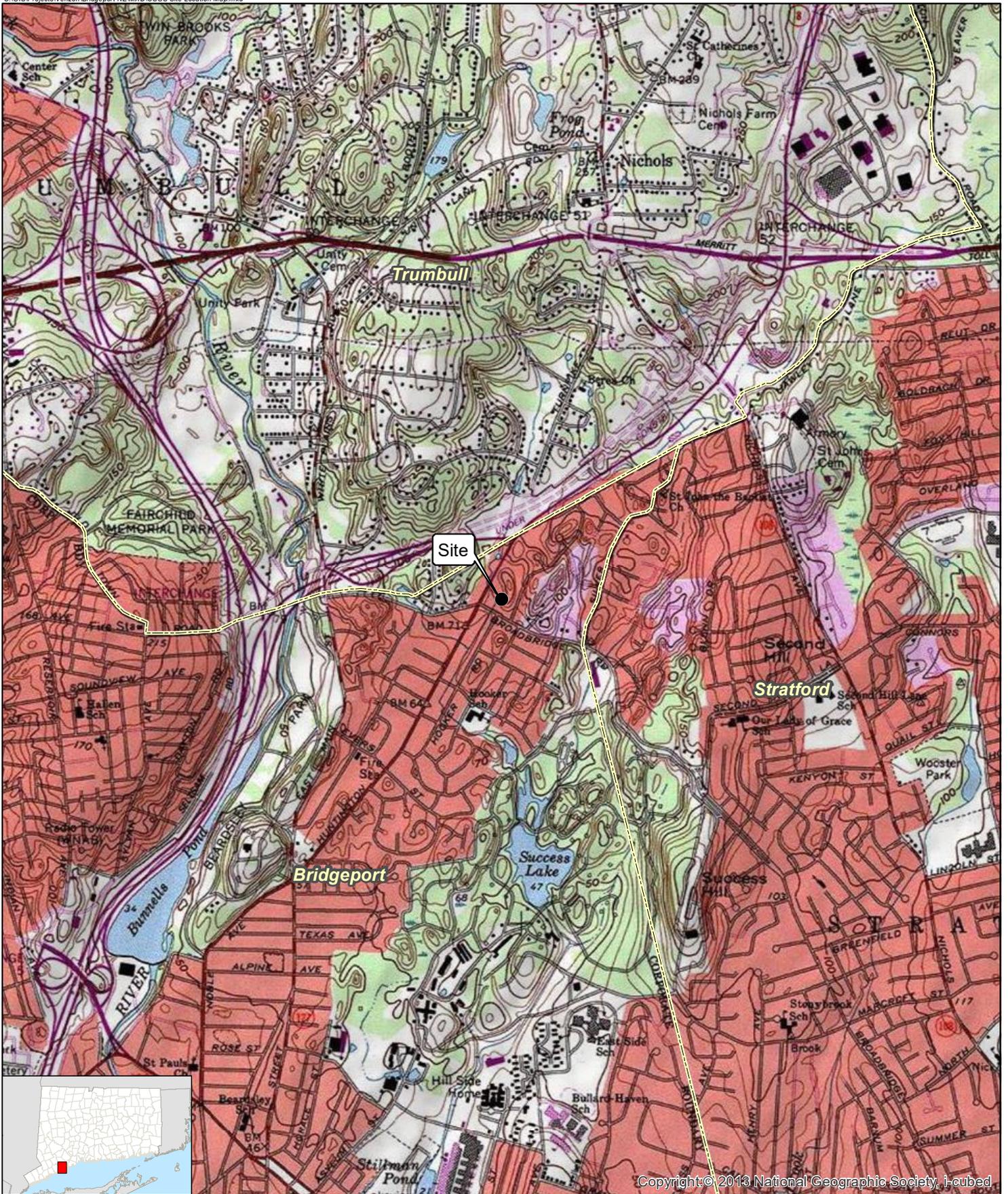
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EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 1.26-acre parcel at 541 Broadbridge Road in Bridgeport, Connecticut (the “Property”). The parcel is owned by Beardsley Plaza Limited Partnership. Cellco refers to this cell site as its “Bridgeport NE Facility”.

The Bridgeport NE Facility will provide enhanced wireless voice and data services in northerly portions of Bridgeport, as well as portions of Trumbull and Stratford, improve coverage along portions of Route 8, Huntington Turnpike and Broadbridge Road and the surrounding commercial and residential areas and provide capacity relief to Cellco’s existing North Bridgeport 2 and Trumbull II cell sites that are currently operating at or near their capacity limits.

Cellco proposes to construct a 100-foot “flagpole” tower within a 8’ x 19’ fenced compound in the northeast portion of the Property. Cellco would install six (6) panel-type antennas inside the upper portion of the tower (three (3) antennas at the 82-foot level and three (3) antennas at the 92-foot level) behind RF transparent sheathing. Radio equipment cabinets, nine (9) remote radio heads and a natural gas-fueled back-up generator would be located on the ground adjacent to the tower and at the northeast corner of the existing commercial building. Vehicular access to the facility would extend from Broadbridge Road over the existing driveway and parking area used by the commercial shopping center. Utilities would extend from existing service on the Property.



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Legend

- Site
- Municipal Boundary

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Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrangle Map: Bridgeport, CT (1984)
 Map Scale: 1:24,000
 Map Date: December 2016

Site Location Map

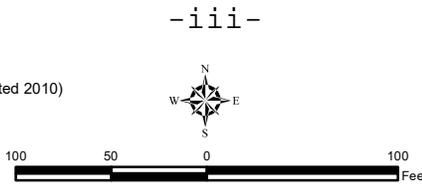
Proposed Wireless
 Telecommunications Facility
 Bridgeport NE
 541 Broadbridge Road
 Bridgeport, Connecticut





- Legend**
- Proposed 100' Flagpole Tower
 - Proposed Fenced/Gravel Equipment Compound Area
 - Proposed Natural Gas Meter at Grade
 - Proposed Natural Gas Line Routed Along Building Roof
 - Proposed Underground Electric & Telco Utilities
 - Approximate Parcel Boundary (CTDEEP GIS Parcels Last Updated 2010)
 - Subject Property

Map Notes:
 No wetlands or watercourses identified on the subject property
 Base Map Source: ESRI Imagery, GBRC RPIP 2013
 Map Scale: 1 inch = 100 feet
 Map Date: March 2017



Aerial Photograph

Proposed Wireless
 Telecommunications Facility
 Bridgeport NE
 541 Broadbridge Road
 Bridgeport, Connecticut



**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP 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 541 BROADBRIDGE ROAD IN BRIDGEPORT, CONNECTICUT	:	DOCKET NO. ____ MARCH 24, 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 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 at 541 Broadbridge Road in Bridgeport, Connecticut (the “Property”). Cellco identifies this cell site as its “Bridgeport NE Facility”. The proposed Bridgeport NE Facility will consist of a 100-foot

monopole/flagpole tower in the northeast corner of a 1.26-acre parcel. Cellco would install its antennas inside the upper portion of the tower behind RF transparent sheathing. The tower, Cellco's equipment cabinets, remote radio heads and a natural gas-fueled back-up generator will be installed within a 8' x 19' fenced compound adjacent to the existing commercial building.

Included in this Application (Attachment 1) is a factual summary and project plans for the proposed Bridgeport NE 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

Cellco is a Delaware Partnership with an administrative office 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:

Cellco Partnership d/b/a Verizon Wireless
99 East River Drive
East Hartford, Connecticut 06108
Attention: Anthony Befera

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 Bridgeport NE 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 sent by certified mail, return receipt requested, 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 parties served with a copy of the Application, is included as Attachment 2.

Notice of Cellco's intent to submit this Application was published on March 22 and March 23, 2017, by Cellco in the *Connecticut Post* pursuant to C.G.S. Section 16-50l(b). A copy of the published 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 Bridgeport NE 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 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 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 1) ensure that all Americans would have access to broadband capability, whether wired or wireless, 2) establish the United States as a leader in wireless service innovation, and 3) 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.²

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

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

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 wireless siting policies.

Included as Attachment 5 is a copy of the FCC's authorization issued to Cellco for its wireless service in Fairfield County, 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 Bridgeport NE Facility would not enlarge Cellco's authorized service area.

B. Public Need and System Design

1. Need for the Bridgeport NE 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 northern portions of Bridgeport and the surrounding towns from its existing Trumbull 4, Trumbull II, Stratford West and North Bridgeport 2 cell sites. Plots showing the extent of reliable wireless service in the area reveal significant "coverage gaps" in Cellco's operating frequencies. Most, if not all of these coverage

gaps will be filled by service from the Bridgeport NE Facility. (See Attachment 6). In addition to the coverage benefits, the proposed Bridgeport NE Facility will provide capacity relief to Cellco's North Bridgeport 2 cell site (Alpha sector) and Trumbull II cell site (Gamma sector) which are currently operating beyond their existing capacity limits.

2. Proposed Cell Site Information

The proposed Bridgeport NE Facility would be located in the northeast portion of an approximately 1.26-acre parcel at 541 Broadbridge Road in Bridgeport. The Property is owned by Beardsley Plaza Limited Partnership and is used for commercial/retail purposes. At this site, Cellco would construct a 100-foot self-supporting monopole/flagpole telecommunications tower. Cellco would install a total of six (6) panel-type antennas inside the upper portion of the tower (three (3) antennas at a height of 82 feet above ground level (AGL) and three (3) antennas at a height of 92 feet AGL) behind RF transparent sheathing. Equipment associated with Cellco's antennas, including two (2) equipment cabinets, nine (9) remote radio heads and a 25 kW natural gas-fueled back-up generator would be located on the ground near the base of the tower within a 8' x 19' fenced compound and leased area. Cellco's equipment cabinets would house radio receiving, transmitting, switching, processing and performance monitoring equipment and back-up batteries for use when commercial power to the facility is interrupted. The back-up generator would be used to recharge the batteries. The equipment would remain unstaffed, except as required for maintenance. Once the cell site is operational, maintenance personnel will visit the cell site on a monthly basis. More frequent visits may be required if there are problems with the cell site equipment.

Vehicular access to the proposed cell site would extend from Broadbridge Road over the existing paved driveway and parking area at the Beardsley Park Plaza. Utilities will extend from existing service along Broadbridge Road. Natural gas service to the back-up generator will extend from service inside the existing commercial building.

The proposed Bridgeport NE Facility will provide reliable wireless service to a 0.7 mile portion of Route 8; a 0.9 mile portion of Huntington Turnpike; a 1.2 mile portion of Broadbridge Road, and an overall area of 4.82 square miles at 700 MHz frequencies; a 0.5 mile portion of Route 8; a 0.7 mile portion of Huntington Turnpike; a 0.9 mile portion of Broadbridge Road, and an overall area of 2.24 square miles at 850 MHz frequencies; a 0.5 mile portion of Route 8; a 0.6 mile portion of Huntington Turnpike; a 0.9 mile portion of Broadbridge Road, and an overall area of 2.59 square miles at 1900 MHz frequencies; and a 0.6 mile portion of Route 8; a 0.8 mile portion of Huntington Turnpike; a 1.0 mile portion of Broadbridge Road, and an overall area of 3.67 square miles at 2100 MHz frequencies.

Cellco's existing surrounding cell sites include: Trumbull 4 – antennas attached to an existing Eversource transmission line structure at 900 Old Town Road in Trumbull, located approximately 1.35 miles northwest of the proposed Bridgeport NE Facility; Trumbull II - antennas on the roof of the Trumbull Marriott Hotel at 180 Hawley Lane in Trumbull, located approximately 1.3 miles northeast of the proposed Bridgeport NE Facility; North Bridgeport 2 – antennas on the roof of a building at 120 Huntington Avenue in Bridgeport, located approximately 0.9 miles southwest of the proposed Bridgeport NE Facility; and Stratford West – antennas on an existing tower at 23 Stonybrook Road in Stratford, located approximately 1.7 miles southeast of the proposed Bridgeport NE Facility.

3. System Design and Cell Site Equipment

a. System Design

Cellco's wireless system in general and the proposed Bridgeport NE 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, remote radio heads 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 inside the top of the tower; two (2) HYBRIFLEX™ fiber optic antenna cables connecting the equipment to the antennas; and a GPS antenna. Back-up power to the Bridgeport NE Facility will be provided by a battery system and a 25 kW, natural gas-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

Cellco's goal in selecting cell sites, like the ones 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 NE Facility would

satisfy this goal and provide high-quality reliable wireless service along portions of Routes 8, 108 and 15 and local roads, as well as residential and commercial land uses in the area and provide capacity relief to its existing North Bridgeport 2 and Trumbull II cell sites.

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 existing towers or other non-tower structures considered is included in Attachment 8. Cellco currently shares all of these existing towers, all of which are within approximately two (2) miles of the Bridgeport NE Facility location. These existing sites are identified on the coverage maps included in Attachment 6. These adjacent cell sites cannot, however, satisfy the coverage objectives for the Bridgeport NE Facility 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 such non-tower structures of suitable height were available to lease in Bridgeport. Cellco initiated a site search process for the Bridgeport NE cell site in June, 2011. Shortly thereafter, the site was put on hold. In 2014, the site was reactivated to address coverage and LTE capacity issues in the area. Cellco identified the proposed tower location as a viable candidate for a cell site and determined that an antenna height of 82 and 92 feet respectively at this location 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 sites selected represent the most feasible alternative of the sites investigated.

2. Tower Sharing

Due to the location and design of the Bridgeport NE Facility tower sharing will be more of a challenge than at a traditional tower site. It is conceivable that one or two additional antenna locations at the 72-foot and 62-foot levels could be made available to other carriers, if a need exists. Limited ground space within the fenced compound may, however, limit tower sharing opportunities. The external mounting of more traditional municipal emergency service antennas could also, potentially, be accommodated. As of the date of this filing, no other wireless carrier nor the City of Bridgeport has yet expressed any interest in the Bridgeport NE 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 City of Bridgeport.³ The Bridgeport NE 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 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.

³ 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 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.

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 NE 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.⁴ 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 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 installations.” The proposed telecommunications towers disguised as a flagpole can help to further reduce visual impacts associated with this structure. Attachment 9 contains Visibility Analysis prepared by All-Points Technology Corporation (“APT”) for the Bridgeport NE Facility. The Visibility Analysis assesses the visual impact of the tower on the surrounding areas and includes photosimulations for the Council’s review and consideration.

⁴ For example, the only ground disturbance associated with the Bridgeport NE Facility will occur within the 8’ x 19’ (152 square feet) facility compound. The compound will occupy an area of the Property that is currently paved.

According to the Visibility Analysis, areas where the flagpole tower would be visible above the tree canopy comprise approximately 60 acres, or 0.75 percent of the 8,042 acre study area. Year-round visibility of the Bridgeport NE Facility tower are limited to locations in the immediate vicinity (generally within 0.25 miles) of the Property. Areas where seasonal views are anticipated comprise approximately 489 additional acres (6.1 percent of the 8,042 acre study area).

There are approximately 142 residences within 1,000 feet of the Bridgeport NE Facility. The closest off-site residence is located at 29 Holland Road, approximately 75 feet to the east. Weather permitting, the Applicant will raise balloons with a diameter of at least three (3) feet at the Bridgeport NE 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 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 the National Environmental Policy Act ("NEPA") Checklist, solicits comments on the proposed Bridgeport NE Facility 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").

(1) **USFWS & CT DEEP NDDB Reviews**

According to the Preliminary USFWS & CT DEEP Compliance Determination dated February 2, 2017, prepared by APT, no State of federally-listed threatened species or critical habitat have been documented in the vicinity of the Property. (See Attachment 10).

(2) **Wetlands Inspection**

As discussed in Section III.C.5.d. below, the development of the Bridgeport NE Facility is located approximately 190 feet east of an intermittent watercourse feature along the northern boundary of the Property. Cellco does not anticipate that its developments of the Bridgeport NE Facility will have any adverse impact on this nearby resource. (See Wetlands Inspection Report – Attachment 11).

(3) **State Historic Preservation Officer**

According to a Preliminary Historic Resources Determination prepared by APT for the Bridgeport NE 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 Bridgeport NE Facility. (See Attachment 12). The SHPO's review of the tower proposal is on-going. A copy of the SHPO's final comments on this proposal will be filed with the Council as soon as they are available.

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 Bridgeport NE Facility 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 the proposed Bridgeport NE Facility would remain well below (38.06%) the FCC’s Standard. Actual RF emissions levels from the proposed facility would be far below these “worst-case” calculations. A worst-case General Power Density table is included in Attachment 13.

d. Other Environmental Issues

No sanitary facilities are required for the Bridgeport NE Facility. The operations at the Bridgeport NE 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 proposed Bridgeport NE 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 Municipality’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 NE Facility would be located on an approximately 1.26-acre parcel owned by the Beardsley Plaza Limited Partnership. The Property is zoned Office Retail (“OR”) and is occupied by the Beardsley Park Shopping Plaza, with its related parking and loading areas.

b. Plan of Conservation and Development

The City of Bridgeport Master Plan of Conservation & Development (Dated March 2008) (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 City. Four (4) copies of the Plan were filed, in bulk, with the Council.

c. Zoning Regulations

According to the Bridgeport Zoning Map, the Property is located in the Office/Retail Zone. Pursuant to Section 12-14a. of the Zoning Regulations, the City regulates the installation of antennas and associated equipment on, over or in a building. “Applications for the installation of a telecommunications tower shall be filed only with the State of Connecticut Siting Council.”

d. Inland Wetland and Watercourse Regulations

The Bridgeport Inland Wetlands and Watercourses 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. Regulated activity includes any operation within 100 feet of a wetland or watercourse, as defined. 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 Wetlands Inspection report for the Bridgeport NE Facility. A copy of the Wetlands Inspection report is included in Attachment 11. No wetlands or watercourses are located on the subject Property. An intermittent stream (watercourse) flows under the central portion of the Property and daylights off-site along the northern Property boundary and across Broadbridge Road to the south of the Property. The proposed flagpole tower would be located approximately 190 feet east of this off-site intermittent watercourse feature. Underground utilities would extend a distance of approximately 120 feet from existing service to the south along 541 Broadbridge Road. The proposed development would not result in a likely adverse impact to this off-site watercourse.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Community Panel Number 0901360020B (Effective June 18, 2010) the Bridgeport NE 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 14.

6. Local Input

Section 16-50(l)(e) of the Connecticut General Statutes, as amended, requires local input on matters before the Council. On November 21, 2016, Cellco representatives met with Daniel Roach, Chief of Staff and Edward Adams, Senior Advisor to Bridgeport Mayor Joseph Ganim to commence the ninety (90) day municipal consultation process. Mr. Roach and Mr. Adams received a copy 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 NE Facility, the need for wireless service in northern Bridgeport and the Connecticut

Siting Council application process. Bridgeport officials did not ask Cellco to hold a public information meeting on the proposed facility. Because the Bridgeport NE Facility is located within 2,500 feet of the Trumbull and Stratford town lines, copies of the Technical Report were also sent to Tim Herbst, Trumbull's First Selectman and Mayor John Harkins of Stratford.

7. **Consultations With State and Federal Officials**

Attachments 10, 11, 12, 14 and 15 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Bridgeport NE 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**

As it does with all of its tower applications, Cellco conducted on air-space analyses for the proposed Bridgeport NE Facility to determine if the proposed tower would constitute an obstruction or hazard to air navigation. This analysis has confirmed, pursuant to FAA standards and guidelines, that the proposed tower 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 Report is included in Attachment 15.

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**

Pursuant to R.C.S.A. § 22a-174-3, the on-site emergency back-up generator proposed as a part of this Application will require the issuance of a permit from the DEEP Bureau of Air Management. As proposed, this emergency generator will be run only during the interruption of utility service to the cell site and periodically as required for maintenance purposes. Cellco will obtain the necessary permit prior to installing the generator at the Bridgeport NE Facility.

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 NE Facility is \$613,000. This estimate includes:

(1)	Cell site radio equipment of approximately	\$170,000
(2)	Tower, coax and antenna costs of approximately	250,000
(3)	Power systems costs of approximately	50,000
(4)	Equipment and platform costs of approximately	98,000
(5)	Miscellaneous costs (including site preparation and installation) of approximately	45,000

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 the Bridgeport NE 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 the Towns of Trumbull and Stratford, 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 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 Bridgeport NE Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

By: _____

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