

**CONNECTICUT SITING COUNCIL**  
**DOCKET NO. 472**

IN THE MATTER OF:

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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 IN  
BRIDGEPORT, CONNECTICUT

APPLICANT'S POST-HEARING BRIEF

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## EXECUTIVE SUMMARY

On March 24, 2017, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) filed an application (“Application”) with the Connecticut Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (“Certificate”) to construct a wireless telecommunications facility on an approximately 1.26-acre parcel at 541 Broadbridge Road in Bridgeport, Connecticut (the “Property”). The Property is owned by the Beardsley Plaza Limited Partnership (the “Owner”) and is used for commercial/retail purposes.

### Facility Description

Cellco proposes to construct an 100-foot tall “unipole” tower in the northeasterly portion of the Property. Cellco would install six (6) antennas inside the upper portion of the unipole, three antennas at the 92-foot level and three antennas at the 82-foot level. The unipole, Cellco’s radio equipment, remote radio heads and a 25 kW natural gas-fueled back-up generator would be located within an 8-foot by 19-foot fenced facility compound adjacent to the easterly wall of the shopping center building (the “Bridgeport NE Facility”). A small retaining wall will be installed to the east of the tower site to maintain pedestrian access around the building. Access to the Bridgeport NE Facility would extend from Broadbridge Road over an existing paved driveway and parking area, a distance of approximately 120 feet to the facility compound.

### Public Need

The proposed Bridgeport NE Facility is needed to fill gaps in wireless service in northern portions of City of Bridgeport and southerly portions of the Town of Trumbull, particularly along portions of Route 8, Huntington Turnpike and Broadbridge Road in each of Cellco’s operating

frequencies. The Bridgeport NE Facility will also provide capacity relief to Cellco's existing North Bridgeport 2 and Trumbull II cell sites which are operating at or beyond their current capacity limits.

**Nature of Probable Impacts**

The Docket No. 472 record contains ample evidence to support a finding by the Council that the Bridgeport NE Facility would not have a significant adverse impact on the environment. Cellco has presented evidence that the location and development of the Bridgeport NE Facility will have no effect on historic resources in the area; will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not have any direct or indirect impact on wetlands, watercourses and/or vernal pools; will not constitute an obstruction or hazard to air navigation and, therefore, will not require any FAA marking or lighting; and will operate well within safety limits established by the FCC for radio frequency emissions.

Visual impacts of the proposed Bridgeport NE Facility will be minimal. The overall areas where the unipole tower would be visible above the tree canopy comprise approximately 60 acres, or 0.75 percent of the two-mile radius (8,042 acre) study area (the "Study Area"). Year-round visibility of the Bridgeport NE Facility tower is limited to locations on and in the immediate vicinity of the Property. Areas where seasonal views are anticipated comprise approximately 489 additional acres, less than 7% of the Study Area. A majority of the year-round view will be within the immediate vicinity (within 0.25 miles) of the Property and would be limited, to a significant extent, to upper portions of the unipole. By using a unipole tower design with internal-mounted antennas at the Property, rather than a traditional monopole, Cellco can further reduce the visual impacts of the tower from surrounding properties.

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. A significant stand of trees along the eastern and northern property boundary will continue to provide screening between the closest residence (located 75 feet to the east) and the proposed tower site.

### **Public Input**

On November 21, 2016, Cellco representatives met with City of Bridgeport Officials to commence the ninety (90) day municipal consultation process. City Officials 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.

### **Conclusion**

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Bridgeport NE Facility and that the environmental impacts from the proposed facility location would be minimal.

## **I. INTRODUCTION**

On March 24, 2017, Cellco Partnership d/b/a Verizon Wireless (“Cellco” or “Applicant”) filed with the Connecticut Siting Council (“Council”) an application (the “Application”) for a certificate of environmental compatibility and public need (“Certificate”), pursuant to Sections 16-50g *et seq.* of the Connecticut General Statutes (“Conn. Gen. Stat.”), for the construction, maintenance and operation of a wireless telecommunications facility (the “Bridgeport NE Facility”) on an approximately 1.26 acre parcel at 541 Broadbridge Road in Bridgeport, Connecticut (the “Property”). The Property is owned by the Beardsley Plaza Limited Partnership and is used for commercial/retail purposes. (Cellco Exhibit 1 (“Cellco 1”); June 15, 2017 Site Visit). The proposed wireless facility is needed to fill gaps in wireless service in northern portions of Bridgeport and southerly portions of Trumbull, Connecticut, particularly along portions of Route 8, Huntington Turnpike and Broadbridge Road, and provide capacity relief to Cellco’s existing Bridgeport North 2 and Trumbull II cell sites. (Cellco 1, pp. 7-8, Tab 1).

## **II. PROCEDURAL BACKGROUND**

On June 15, 2017, the Council conducted an evidentiary hearing and an evening public hearing on the Application (June 15, 2017 Transcript (“Tr. 1”)). Prior to the evidentiary hearing, at 2:00 p.m. the Council conducted a site visit at the Property. Between the hours of approximately 8:00 a.m. and 6:00 p.m. on June 15, 2017, Cellco caused a red balloon to be flown as prescribed by the Council. (Tr. 1, pp. 12-13).

This Post-Hearing Brief is filed on behalf of the Applicant pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”). The brief evaluates the Application in light of the Council’s review criteria, as set forth in Section 16-50p of the Connecticut General Statutes and addresses other issues raised throughout the course of this

proceeding.

### **III. FACTUAL BACKGROUND**

#### **A. Pre-Application History**

Cellco is licensed to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges throughout Connecticut. Cellco currently provides wireless service in Bridgeport and the surrounding Towns of Trumbull and Stratford from its existing Trumbull 4, Trumbull II, North Bridgeport 2 and Stratford West cell sites. Plots showing the extent of reliable wireless service in the area and system performance data provided during the course of this proceeding reveals gaps in existing wireless service along portions of Routes 8, 15 and 108, including, portions of Broadbridge Road and Huntington Turnpike, in each of Cellco's operating frequencies. These coverage gaps would be filled by service from Cellco's Bridgeport NE Facility. 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 antennas) and Trumbull II cell site (Gamma sector antennas). (Cellco 1, pp. 6-7, Tab 6; Cellco 3, Q19, Q20 and Q21).

As a first step in its site search process, Cellco investigates whether there are existing towers or other non-tower structures of suitable height in an area that can be used to satisfy its wireless service objectives. Cellco maintains four (4) existing facilities, on towers within approximately 1.7 miles of the Bridgeport NE Facility location. These sites will all interact with the proposed Bridgeport NE Facility. (Cellco 1, p. 8, Tabs 6 and 8). These adjacent sites cannot, however, satisfy Cellco's need for additional wireless service along portions of Routes 8, 15 and 108, Huntington Turnpike and Broadbridge Road in the area. Cellco also regularly investigates the

use of existing, non-tower structures in an area, when available, as an alternative to building a new tower. No existing non-tower structures of suitable height exist in the area around the Property. (Cellco 1, Tab 8; Tr. 1, p. 46). If a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the facility could be reduced to the greatest extent possible. (Cellco 1, pp. 10-14, Tab 8 and Tab 9). In this instance, Cellco determined that antenna centerline heights of 92 and 82 feet above ground level at this location would satisfy its wireless service objectives and that the site selected represents the most feasible alternative of the sites investigated.

B. Local Contacts

On November 21, 2016, Cellco representatives met with Daniel Roach, Chief of Staff and Edwards Adams, Senior Advisor to Bridgeport's Mayor Joseph Ganim to commence the ninety (90) day municipal consultation process. The City received a copy of technical information summarizing Cellco's plans to establish a telecommunications facility as described above. The City did not ask Cellco to host a Public Information Meeting on the Bridgeport NE Facility. (Cellco 1, pp. 18-19; Tr. 1, p. 88).

C. Tower Sharing

Due to the location and design of the Bridgeport NE Facility unipole, sharing of the facility with other entities is more traditional tower site. It is conceivable that one or possibly two additional antenna locations (72 feet and 62 feet above ground level) could be made available to other carriers, if a need exists. (Cellco 1, p. 12, Tab 1). Likewise, ground space limitation within Cellco's fenced compound area may require other carriers to enter into separate land lease agreements with the Property owner for equipment space. The external mounting of municipal



emergency service antennas to the unipole could also, potentially, be accommodated. Use of a more traditional platform-mounted antenna array may allow for more tower sharing opportunities but would prove to be more visually intrusive on adjoining properties. As of the date of this filing, no other wireless carrier nor the City of Bridgeport, Town of Trumbull or Town of Stratford have expressed any interest in sharing the Bridgeport NE Facility. (Cellco 1, p. 12; Tr. 1, pp. 16, 23, 60, 69-70 and 78-79).

D. The Bridgeport NE Facility Proposal

The Bridgeport NE Facility would be located within a 8' x 19' fenced compound and leased area in the northeasterly portion of an approximately 1.26 acre commercial parcel at 541 Broadbridge Road in Bridgeport. At this location, Cellco would construct an 100-foot self-supporting "unipole" tower. Cellco would install three (3) antennas at the 92-foot level and three (3) antennas at the 82-foot level on the unipole behind RF transparent sheathing. Vehicular access to the site would extend from Broadbridge Road over the paved driveway and parking area at the Beardsley Park Shopping Plaza. Power and telephone service will extend from existing service along Broadbridge Road. (Cellco 1, pp. iii, 7-8, Tab 1).

Cellco's radio equipment and a 25 kW natural gas-fueled back-up generator will be installed on the ground near the base of the tower within a 8' x 19' fenced compound. Natural gas service will extend from existing service on the Property. (Cellco 1, Tab 1; Tr. 1, p. 31). Cellco's equipment would be equipped with a silent intrusion and system alarms and will be monitored on a 24-hour basis to receive and to respond to incoming alarms or other technical problems. (Cellco 1, pp. 7-8, Tab 1).

**IV. THE APPLICATION SATISFIES THE CRITERIA OF CONN. GEN. STAT. § 16-50P FOR ISSUANCE OF A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

Section 16-50p of the Public Utility Environmental Standards Act (“PUESA”), Conn. Gen. Stat. § 16-50g *et seq.*, sets forth the criteria for Council decisions in Certificate proceedings and states, in pertinent part:

In a certification proceeding, the council shall render a decision upon the record either granting or denying the application as filed, or granting it upon such terms, conditions, limitations or modifications of the construction or operation of the facility as the council may deem appropriate . . . . The council shall file, with its order, an opinion stating in full its reasons for the decision. The council shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (A) . . . a public need for the facility and the basis of the need; (B) The nature of the probable environmental impact . . . including a specification of every significant adverse effect . . . whether alone or cumulatively with other effects, impact on, and conflict 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; (C) Why the adverse effects or conflicts referred to in subparagraph (B) of this subdivision are not sufficient reason to deny the application . . . .

Conn. Gen. Stat. § 16-50p(a).

Under Section 16-50p, the Applicant must satisfy two key criteria in order for the Application to be granted and for a Certificate to issue. First, the Applicant must demonstrate that there is a “public need for the facility.” Conn. Gen. Stat. § 16-50p(a)(3)(A). Second, the Applicant must identify “the nature of the probable environmental impact” of the proposed facility through review of the numerous elements specified in Conn. Gen. Stat. § 16-50p(a)(3)(B), and then demonstrate that these impacts “are not sufficient reason to deny the application.” Conn. Gen. Stat. § 16-50p(a)(3)(C). The evidence in the record for this docket establishes that the above criteria have been satisfied and that the Applicant is entitled to a Certificate.

A. A Public Need Exists for a Bridgeport NE Facility

As noted in the Application, the FCC in its Report and Order released on May 4, 1981 (FCC Docket No. 79-318) recognized a public need on a national basis for technical improvement, wide area coverage, high quality and a degree of competition in mobile telephone service. The Federal Telecommunications Act of 1996 (the “Telecommunications Act”) emphasized and expanded on these aspects of the FCC’s 1981 decision. Among other things, the Telecommunications Act recognized an important nationwide public need for high quality personal wireless telecommunications services of all varieties. The Telecommunications Act also expressly promotes competition and seeks to reduce regulation in all aspects of the telecommunications industry in order to foster lower prices for consumers and to encourage the rapid deployment of new telecommunications technologies. (Council Adm. Notice 4).

In 2009, President Obama issued Presidential Proclamation 8460, in which “cellular phone towers” were identified as critical infrastructure vital to national security. (Council Adm. Notice 11). The same year, the United States Congress directed the FCC to develop a national broadband plan to ensure that every American has access to (wireless) broadband capability. The FCC released Connecting America: The National Broadband Plan (the “Broadband Plan”) a year later, which recognized broadband as a “foundation for economic growth, job creation, global competitiveness and a better way of life.” One of the Plan’s goals for 2020 is for the United States to “lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation.” (Council Adm. Notice 18).

The proposed Bridgeport NE Facility would be part of Cellco’s expanding wireless telecommunications network envisioned by the Telecommunications Act and the Broadband Plan

and has been developed to help meet these nationwide goals. In particular, Cellco's system has been designed, and the cell site proposed in this Application has been selected, so as to maximize the geographical coverage, improve network capacity and improve the overall quality of wireless service to allow for the efficient and reliable use of Cellco's network. (Cellco 1, pp. 6-7). As the Council is aware, Cellco holds licenses to provide wireless services in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequency ranges in Fairfield County, and throughout the State of Connecticut. Initially, Cellco intends to operate within its 700 MHz and 2100 MHz frequencies at the Bridgeport NE Facility. (Tr. 1, pp. 17-19, 21-22; Cellco 1, Tab 5).

The record contains ample, written evidence and testimony that Cellco's antenna height of 92 feet and 82 feet AGL at the Bridgeport NE Facility would allow Cellco to satisfy its wireless service objectives in the area and continue to provide high-quality reliable wireless service in northerly portions of the City. (Cellco 1, pp. 6-7, Tab 6; Cellco 3, Q16, Q22 and Q23).

The Bridgeport NE Facility would provide coverage to existing gaps in service along portions of Routes 8, 15 and 108, Huntington Turnpike and Broadbridge Road as well as secondary roads in the area. (Cellco 3, Q24 and Q25). Coverage along these same roadways would be impacted if the Bridgeport NE tower were ten feet shorter. (Cellco 3, Q27).

In addition to the coverage benefits, the Bridgeport NE Facility will provide capacity relief to Cellco's existing North Bridgeport 2 cell site (Alpha sector) and Trumbull II cell site (Gamma sector). The Trumbull II Facility has been in "exhaust" since March of 2017. North Bridgeport 2 is projected to exhaust in November of 2017. (Cellco 1, pp. 6-7; Cellco 3, Q21).

System performance data provided to the Council also demonstrates that none of the existing, surrounding cell sites currently meet Cellco's performance standard for "Dropped Calls".

Likewise, two (2) of the existing surrounding cell sites do not currently meet Cellco's performance standard for "Ineffective Attempts". Dropped Calls and Ineffective Attempts are two critical network performance parameters that Cellco will consider as it looks to continually improve network performance. (Cellco 3, Q20).

B. Nature of Probable Impacts

The second step in the statutory review procedure addresses the probable environmental impacts of the Bridgeport NE Facility. Cellco submits that, based on the statutory factors listed below, the proposed Bridgeport NE Facility will not have a significant adverse effect on the environment.

1. Natural Environment and Ecological Balance

The proposed development of the Bridgeport NE Facility has eliminated, to the extent possible, impacts on the natural environment. All facility improvements would be located within an 8' x 19' fenced compound and leased area, adjacent to the easterly side of the existing retail building and utilizing existing paved portions of the Property. A small retaining wall will be installed to the east of the tower site. This wall will allow the Property owner to maintain pedestrian access around the building following development of the cell site. (Cellco 1, Tab 1; Tr. 1, pp. 31-44, 69).

Access to the tower site would extend from Broadbridge Road over the existing paved driveway and parking area. No trees will need to be removed<sup>1</sup> and minimal grading would be required for construction of the tower and related site improvements. (Cellco 1, Tab 1). Overall, the Bridgeport NE Facility would have a negligible impact on the physical environment of the

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<sup>1</sup> While no trees will be removed, some branches along the Property boundary may require some trimming to avoid impacting site improvements. (Site Visit; Tr. 1, pp. 24-25).

Property. No evidence to refute this conclusion was presented to the Council.

## 2. Public Health and Safety

Cellco has considered several factors in determining that the nature and extent of potential public health and safety impacts resulting from the installation of the Bridgeport NE Facility would be minimal or nonexistent.

First, the potential for the facility tower to fall does not pose an unreasonable risk to health and safety. The approved tower would be designed and built to meet the appropriate standards for structures and development of this kind. The closest off-site residence is located approximately 75 feet to the east of the proposed tower site at 29 Holland Road. (Cellco 1, p. 14, Tab 1). The proposed 100-foot tall unipole could be designed and constructed with a yield point to protect against a catastrophic tower failure impacting nearby residences. (Tr. 1, pp. 79-80).

Second, worst-case potential public exposure to Radio Frequency (“RF”) emissions from the proposed facility would be 38.06%, well below the FCC Safety Standards. (Cellco 1, pp. 15-16, Tab 1, p. 8, Tab 13).

Given the nature of the tower design and limited ground space availability, sharing of the proposed unipole tower may be a challenge at this location. If approved, however, Cellco will design the unipole tower to be shared by other wireless carriers, and the City’s emergency service providers, if a need exists. Separate ground space lease arrangements with the Property owner would need to be negotiated to accommodate additional carrier equipment. This type of tower sharing arrangement may reduce the need for other carriers or municipal entities to develop a separate tower in this same area in the future. (Cellco 1, p. 12; Tr. pp. 68-69).

Overall, the nature and extent of potential, adverse public health and safety impacts resulting from construction and installation of the Bridgeport NE Facility would be minimal or nonexistent. The public safety benefits of improved wireless service, capable of supporting local emergency service communications, however, would be substantial. (Cellco 3, Q13 and Q14). No evidence to refute these conclusions was presented to the Council.

### 3. Scenic Values

As noted in the Application, the primary impact of any tower, even the unipole proposed in this docket, is visual. Cellco's site search methodology, described in the Site Search Summary, is designed in large part to minimize such visual impacts. As discussed above, wherever feasible, Cellco avoids construction of a new tower by first attempting to identify use and existing towers or other tall non-tower structures in or near a particular search area. Cellco currently maintains four (4) existing telecommunications facilities, all within approximately 1.7 miles of the Bridgeport NE Facility location. These sites will interact with the proposed Bridgeport NE Facility. However, these adjacent sites cannot satisfy Cellco's need for improved wireless service in and near the designated Bridgeport NE Facility search area.<sup>2</sup> 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 (i.e. transmission towers; water tanks, etc.) of suitable height exist or were available for lease. (Cellco 1, pp. 11-12, Tab 6, Tab 8; Tr. 1, p. 46). If it determines that a new tower must be constructed, Cellco attempts to identify sites where the construction of a tower would not be inconsistent with area land uses and where the visual impact of the site may be

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<sup>2</sup> Before initiating a site search process for a new tower site, Cellco will "optimize" the wireless service from the existing sites in an effort to resolve the coverage and capacity problems in the area. When optimization efforts fail, a new cell site search effort is undertaken.

reduced to the greatest extent possible. Cellco also considers if a non-traditional tower design is warranted given characteristic of the area where the tower would be located. (Cellco 1, Tab 8; Tr. 1, pp. 61 and 75).

Cellco submitted a Visibility Analysis prepared by All-Points Technology Corporation (“APT”) as a part of the Application. Prior to preparing its report, APT conducted a balloon float and field reconnaissance to obtain photographs for use in the Visibility Analysis. Given the mix of commercial and residential development in the area around the Property, Cellco selected the “unipole” (a/k/a flagpole) tower design to reduce, the overall impact of the facility on the neighboring residential properties. (Cellco 1, Tab 9). APT determined that top portions of the unipole tower may be visible above the tree canopy from approximately 60 acres or 0.75 percent of the two-mile radius (8,042 acre) study area. Year-round visibility of the Bridgeport NE Facility is generally limited to select portions of the Property. Areas where seasonal views are anticipated comprise approximately 489 additional acres. (Cellco 1, pp. 13-14, Tab 9). As discussed during the hearing, there are probably five or six adjacent residential parcels that will likely have, at least, seasonal views of the unipole tower. (Tr. 1, pp. 25-30). Providing the “clean look” of a unipole, with concealed antennas also helps soften the overall visual effects of a facility on adjacent parcels. (Tr. 1, p. 75).

#### 4. Historical Values

As it does with all of its tower proposals, prior to filing the Application with the Council, Cellco requested that the State Historic Preservation Office (“SHPO”) of the Connecticut Historical Commission (the “Commission”) review the proposed facility and provide a written response. In a letter dated February 3, 2017, APT opined that the proposed facility would have no impact on



historic properties listed on or eligible for listing on the National Register of Historic Places. (Cellco 1, Tab 12; Cellco 3, Q41).

5. Recreational Values

There are no recreational activities or facilities on the Property that would be adversely impacted by development of the Bridgeport NE Facility. (Cellco 1, pp. 16-17, Tab 9).

6. Forests and Parks

There is no State or local forests or park land that will be adversely impacted as the proposed Bridgeport NE Facility tower. (Cellco 1, Tab 9). No evidence to refute this conclusion was presented to the Council.

7. Air and Water Quality

a. Air Quality.

Under normal operating conditions, the Cellco equipment at the Bridgeport NE Facility would generate no air emissions. During power outage events and periodically for maintenance purposes, Cellco would utilize a natural gas-fueled generator to provide emergency back-up power. Cellco's back-up generator will be managed to comply with the "permit by rule" criteria established by the Connecticut Department of Energy and Environmental Protection ("DEEP") Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b. (Cellco 1, p. 20; Tr. 1, pp. 55-56).

b. Water Quality.

The proposed Bridgeport NE Facility would not utilize water, nor would it discharge substances into any surface water, groundwater, or public or private waste water disposal system. Dean Gustafson, Professional Soil Scientist with APT, conducted a field investigation and completed a Wetlands Inspection Report for the Bridgeport NE Facility. According to this evaluation, the closest wetland area to the tower is an intermittent watercourse feature located

approximately 190 feet to the west of the proposed tower site. In the Wetlands Evaluation, Mr. Gustafson concludes that the Bridgeport NE Facility will have no temporary or permanent impacts to wetlands and watercourses will occur. (Cellco 1, pp. 17-18, Tab 1, Tab 12). No evidence to refute these conclusions was presented to the Council.

## 8. Fish and Wildlife

According to the Preliminary U.S. Department of Interior, Fish and Wildlife Service (“USFWS”) and the Connecticut Department of Energy and Environmental Protection (“DEEP”) Compliance Determination dated February 2, 2017, no State or federally listed, threatened, threatened species or critical habitat has been documented in the vicinity of the Property. DEEP does not anticipate negative impacts to State-listed species resulting from the construction of the proposed Bridgeport NE Facility. (Cellco 1, p. 15; Tab 10).

### C. The Application Should Be Approved Because The Benefits Of The Proposed Facility Outweigh Any Potential Impacts

Following a determination of the nature of the probable environmental impacts of the Bridgeport NE Facility site, Conn. Gen. Stat. § 16-50p requires that the Applicant demonstrate why these impacts “are not sufficient reason to deny the Application.” Conn. Gen. Stat. § 16-50p(a)(3). The record establishes that the impacts associated with the proposal would be limited and outweighed by the significant benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application.

As discussed above, the only potential adverse impact from the proposed tower involves “scenic values.” As the record overwhelmingly demonstrates, the Bridgeport NE Facility would have minimal impacts on scenic values in the area. These minimal impacts are also mitigated by Cellco’s use of a unipole tower. (Cellco 1, Tab 9). Regardless, these limited aesthetic impacts may

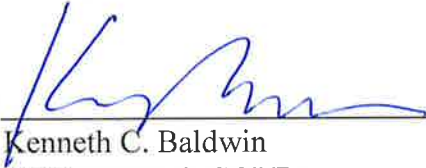
be, and in this case are, outweighed by the public benefit derived from the establishment of the facility. Unlike many other types of development, telecommunications facilities do not cause indirect environmental impacts, such as increased traffic and related pollution. The limited aesthetic and environmental impacts of either alternative site can be further mitigated by the sharing of the facility. Cellco intends to design the tower so that it could be shared by other wireless carriers, and the City, or local emergency service providers, if a need exists. (Cellco 1, p. 12).

In sum, the potential environmental impacts from the Bridgeport NE Facility would be minimal when considered against the benefits to the public. These impacts are insufficient to deny the Application. The site, therefore, satisfies the criteria for a Certificate pursuant to Conn. Gen. Stat. § 16-50p, and the Applicant’s request for a Certificate should be granted.

**V. CONCLUSION**

Based on the overwhelming evidence in the record, the Applicant has established that there is a need for a Bridgeport NE Facility and that the environmental impacts associated with the Application would be limited and outweighed by the benefits to the public from the proposed facility and, therefore, requires that the Council approve the Application. Therefore, the Council should approve the Application as submitted.

Respectfully submitted,  
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WIRELESS

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