



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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(VIA ELECTRONIC MAIL)

May 19, 2017

TO: Parties and Intervenors

FROM: Melanie A. Bachman *MAB*
Executive Director

RE: **DOCKET NO. 473** - Homeland Towers, LLC and Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 515 Morehouse Road, Easton, Connecticut.

The Connecticut Siting Council (Council) is in receipt of correspondence from First Selectman Adam Dunsby received May 18, 2017 concerning the above-referenced application.

Pursuant to Connecticut General Statutes §16-50(b), a copy of the application is to be submitted to the Town of Easton for review. In the event that the Town of Easton does not avail itself of the opportunity to attain party status under Connecticut General Statutes §16-50n, this correspondence shall become part of the record in this proceeding in the form of a limited appearance.

Therefore, copies of First Selectman Adam Dunsby's correspondence are being distributed to all participants in this proceeding and will also be administratively noticed in the record.

MAB/RDM/lm

c: Council Members



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May 19, 2017

The Honorable Adam W. Dunsby
First Selectman
Town of Easton
Town Hall
225 Center Road
Easton, CT 06612

RE: **DOCKET NO. 473** - Homeland Towers, LLC and Cellco Partnership d/b/a Verizon
Wireless application for a Certificate of Environmental Compatibility and Public Need for
the construction, maintenance, and operation of a telecommunications facility located at 515
Morehouse Road, Easton, Connecticut.

Dear First Selectman Dunsby:

The Connecticut Siting Council (Council) is in receipt of your correspondence received on May 18,
2017 concerning the above-referenced application. Thank you for taking the time to provide the
Council with your comments.

Pursuant to Connecticut General Statutes §16-50/(b), a copy of each application is to be submitted to
the host municipality where the facility is to be located and any municipality within 2500 feet of the
facility location for review. Before reaching a final decision on an application, the Council carefully
considers all of the facts contained in the evidentiary record that is developed by the Council, the
applicant, parties and intervenors in the proceeding and members of the public who speak at the
public hearing or submit written statements to the Council.

In the event that you do not seek formal party or intervenor status under Connecticut General
Statutes §16-50n, which provides full participation at the public hearing, including, but not limited to,
cross examination of witnesses, parties and intervenors, your comments shall nevertheless become
part of the official record in this proceeding in the form of a limited appearance defined under
subsection (f) of Connecticut General Statutes §16-50n.

Therefore, copies of your correspondence will be distributed to all participants in the proceeding and
will be administratively noticed in the record. Please note that you can view all of the documents
related to this proceeding on our website at www.ct.gov/csc under the "Pending Matters" link. You
may also keep apprised of Council events on the website calendar and agenda.

Thank you for your interest and concern in this matter.

Very truly yours,

Melanie A. Bachman
Executive Director

MAB/RDM/lm

c: Parties and Intervenors
Council members





Town of Easton

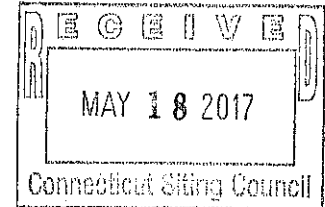
Adam Dunsby
First Selectman

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Melanie A. Bachman
Executive Director
CONNECTICUT SITING COUNCIL
Ten Franklin Square
New Britain, CT 06051

ORIGINAL



RE: **Docket No. 473** -Telecommunication facility 515 Morehouse Road, Easton,
Connecticut.

Dear Ms. Bachman:

The Town of Easton **supports** the construction of a cell tower on municipal land at 515 Morehouse Road. A tower is necessary for public safety. People who need assistance when not near a landline are sometimes unable to contact emergency services. Our two public schools and associated fields have weak or no service.

Present and future residents of Easton should also have basic cell service.

In 2012, the Easton Board of Selectmen asked Easton's Planning and Zoning Commission to evaluate Easton's municipal land to determine the best location, if any, for a tower. The Commission's top recommendation is the location now being considered. Please find the report attached.

After numerous public meetings, the Easton Board of Selectmen voted to issue an RFP for the construction of a cell tower at the Morehouse Road location. The Board subsequently voted to award the lease to Homeland Towers.

The ultimate tower should be 150' or less with space reserved for public safety equipment. The Board understands that the tower will be a "tree."

Sincerely,

Adam Dunsby
First Selectman

AD/jfh

Wireless Telecommunication Facilities For The Town of Easton

A Report to the Board of Selectmen by the Planning and Zoning Commission, August 2013.

The wireless or cell telephone has become the new standard of convenience, reliability and mobility for personal communications. Instant messaging for passengers while away from a land line telephone, or to reach a party at any location, provides unparalleled convenience to those who carry the now ubiquitous pocket-size cell phone. Moreover the "smart phone" makes texting and information search possible from any remote location via wireless telephonics. Modern day life, health and safety are utterly dependent on this new medium of communication.

The Town of Easton, unfortunately, is not yet fully covered by the Wireless Telecommunication Facility (WTF) broadcast network. This network requires strategically located towers and antennas to relay the electronic signals, generally over a radius of two to three miles in "line of sight" fashion. Two WTF towers exist in Easton, located off North Street and Everett Road respectively, providing fairly effective coverage to the northeasterly section of the town. Within a two-mile radius of Easton's borders there presently are nine WTF towers, one each in Monroe, Weston and Redding, two in Trumbull, and four in Fairfield along the Merritt Parkway. These outlying WTF towers provide spotty coverage to higher elevations in the easterly, southerly and westerly rims of the town but there are widespread coverage gaps in the central, southwesterly and southeasterly sections of Easton.

Provision of effective wireless communications throughout Easton is a matter of public urgency for several reasons. The first reason is public safety: the ability to quickly summon emergency aid in instances of playing field injuries, traffic accidents, dwelling fires, domestic invasions and other impending calamities. The second reason is to provide communication abilities during storm emergencies which have compromised land line communication. Police, fire and emergency medical personnel, on call 24/7 in Easton, have stressed to us that their effectiveness requires immediate response. Finally, the quality of life in Easton depends on residents' ability to communicate effectively with family, neighbors and business colleagues whenever and wherever needed.

Cell tower proposals by the various wireless providers have usually met strenuous objections by local residents concerned with the visual impact of a tall tower, typically 150 feet to 190 feet in height, looming above the neighborhood buildings and treeline, and there have been controversies over proposed WTF sites in several locations within Easton. A concern frequently expressed in public hearings held by the Planning and Zoning Commission, regarding proposed WTF sites, is apprehension about exposure to harmful radiation in proximity to such facilities.

The Federal Telecommunications Act of 1996 was enacted “. . . to provide a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly (the) private sector deployment of advanced telecommunications and information technologies and services . . .”. The same Act provided for regulation of radio frequency exposure as a responsibility of the Federal Communications Commission (FCC). In 1997 the FCC adopted limits for “Maximum Permissible Exposure” (MPE) based on recommendations by the National Council on Radiation Protection and Measurements and the Institute of Electrical and Electronics Engineers, Inc., and adopted by the American National Standards Institute (ANSI). In short the FCC licenses WTF antenna facilities and limits radio frequency exposure to levels safe for the general population.

Jurisdiction over the location of WTF facilities is exercised by the State of Connecticut Siting Council with the aim of assuring effective wireless coverage throughout the state. In conversations with the staff attorney for the Siting Council we have learned that the Council prefers to site WTF’s on municipal property or on sites recommended by the municipality, wherever technically feasible. In this manner the town can exercise its best judgment for minimal impact on local neighborhoods as well as optimal coverage for public safety. The Town also may benefit from lease revenue provided by the cellular providers where a WTF is located on Town-owned property.

In November 2012 the Board of Selectmen requested the Planning and Zoning Commission to conduct a study of all Town of Easton municipal properties which might reasonably afford a potential for a WTF site or sites.

Our first step in this study was a request to the State Siting Council for data on existing WTF sites presently providing cellular coverage in Easton. The Council’s report, “RE: Request for a Telecommunications Coverage Assessment of Easton”, including two coverage maps, was received in January 2013. We have additionally compiled a set of propagation analysis maps from the several wireless carriers in the area and have met with their engineers to discuss technical issues as well as the feasibility of several Town-owned sites. From this analysis we have constructed a “SITE SELECTION MATRIX” which evaluates five Town-owned properties in terms of the nine criteria which we suggest are critical factors for selection of a WTF site. These criteria are:

- 1) Location in Area of Coverage Deficiency
- 2) Proximity to Schools, Residences & Public Gathering Places
- 3) Ground Elevation Above Mean Sea Level (Coverage Effectiveness)
- 4) Favorable Site and Terrain for Construction
- 5) Accessibility for Service Vehicles
- 6) Availability of Gas & Electric Service
- 7) Visual Impact on Adjacent Neighborhood
- 8) Alternative Use(s)
- 9) Proximity to Historic or Cultural Area

The criteria used to judge the relative suitability of the five sites are arranged in order of importance, or feasibility for WTF siting, “1)” (Location in Area of Coverage Deficiency) being paramount and “2)” (Proximity to Schools, Residences & Public Gathering Place) nearly as important a consideration.

In addition to the five potential sites identified on the MATRIX several other Town properties were considered but disqualified because of existing use, size or environmental incompatibility. These include the two town school sites (Samuel Staples and Helen Keller), the Town Hall and Library tracts, town parkland in active use, and dedicated Town open space parcels such as the Paine Open Space tract. A Town-owned single lot, with dwelling thereon at 358 Westport Road, was disqualified because of its proximity to other dwellings and small lot size.

While the Town Plan strongly endorses the protection of Easton’s scenic character, residential amenities and pristine environment, the overwhelming importance of providing for public health, safety and communication effectiveness requires that provision be made for adequate wireless coverage within the town. Our analysis of potential WTF sites, therefore, has included a major emphasis on careful site selection to minimize impact on scenic views, protection of residential character and the town’s natural environment, while also striving for sufficiently effective coverage so that the number of future WTF towers may be minimized.

Our evaluation of the five potential “sites” follows. Please refer to the Site Evaluation Matrix for details.

Public Works Facility:

15 Westport Road; 3.20 acres

This small, intensively-developed parcel is located at the junction of Westport, Sport Hill and Stepney Roads. It contains the principal operational yard of the Town Public Works Department, accommodating a large garage, DPW office, sand, salt and equipment storage areas and other facilities. Presently fully utilized in essential maintenance activities for Town roads and other infrastructure, this site lacks space in which to accommodate a WTF. Moreover this site has a high visibility factor. Not recommended.

Old Staples School:

680 Morehouse Road; 11.59 acres.

Comprised of the former elementary school, parking facilities and an actively-used play field with running track, there is no portion of this site with sufficient space or insularity from intensive daily public use to allow reasonable consideration as a WTF site. The fully-occupied building (approximately 40 rooms leased to five tenants), 190 existing and proposed parking spaces and the well-used adjoining public recreation facilities

Old Staples School:

680 Morehouse Road; 11.59 acres. (continued)

(tennis court, track, ballfield) on site, as well as adjacent residential, church and Town Hall facilities, preclude any possible WTF site. Not recommended.

Veterans' Field Park

366 Sport Hill Road; 23.54 acres

A potential site for WTF use at the northwest corner of the undeveloped portion of this site was evaluated by this Commission several years ago. Due to several nearby homes and the proposed site location's proximity to septic leachfields serving the Easton Community Center, our referral response to the Board of Selectmen suggested an alternative location on the same site. The alternative site, about 100 yards to the east, has reasonable elevation, fair screening by adjacent woodland and about 500 feet of separation from the nearest dwelling. However this location, presented to the Siting Council as an alternative site two years ago, received a negative referral from the State Historic Preservation Office due to historic dwellings along the frontage of Old Oak Road. Although another alternate location could be found for WTF use on this Town tract, such would be closer to the Veterans Park ballfields or nearby residences. Not presently recommended.

Aspetuck Park

Black Rock Road @ Redding Road; 13.10 acres

The backland portion of this tract, approximately 7 to 8 acres situated across the Aspetuck River to the rear of the playing fields, has many favorable characteristics as a potential WTF site but is relatively inaccessible due to the river. Comprised of natural woodland on a gently sloping hillside, with picnic grounds along the stream banks, the upper/rear portion of this area has good elevation and screening from the nearest residences. Construction of a single-lane bridge to provide heavy-vehicle access, however, would be an inhibiting factor in the mind of several wireless carriers who have inspected the site. Such bridge, with rustic design and once-a-year carrier use, could be a pedestrian link for recreational use of the "west bank". Deserves a qualified recommendation for a potential WTF site at the rear (and highest) extremity of this tract.

Morehouse Road Tract

West side of Morehouse Road, South of Staples School and School Recreation Fields; approx. 90 acres

This large tract has been developed for the new Samuel Staples School (19 acres), athletic fields to the south, and an animal shelter at the southern extremity .of this tract. Site areas have been allocated for conservation and preservation, future playfields, "outdoor classrooms" and other public uses. In the south central area of the site a densely

Morehouse Road Tract

West side of Morehouse Road, South of Staples School and School Recreation Fields; approx. 90 acres (continued)

wooded hillside site separates the animal shelter/conservation parking area from the future playing fields north of the crest of the hill. Within this woodland area, near its highest point, is a location which we have determined would be well suited for a WTF site meeting virtually all of the important criteria on the SITE SELCTION MATRIX (eight of nine factors). This particular location is well buffered by surrounding forest, has favorable elevation, and setback in excess of 700 feet from the nearest residences across the ridgetop on Morehouse Road. Distances from present and planned playfields is also over 700 feet, and from the school approximately 1,000 feet.

A second access driveway planned to serve future playfields, at the southerly edge of the Conservation meadowland, could also provide convenient access and a gas-service line directly to the WTF site.

This location will require careful planning to protect the environmental quality of the tract as a whole, but is unquestionably the most favorable of the five Town site possibilities and bears our recommendation.

SITE SELECTION MATRIX:

Town-owned Properties Potentially Feasible For Wireless Telecommunications Site Use

Site Selection Criteria	Veterans Field Park (± 23 acres)	Morehouse Tract Park (± 85 acres)	Aspetuck (Toth) Park (± 9 acres)	Old Staples Field (± 4 acres)	Dept. Public Works Site (± 3 acres)
1) Location in Area of Coverage Deficiency	*	*	*	*	*
2) Proximity to Schools, Residences & Public Gathering Places	C (600')	* (900'-1,200')	C (600')	X (400')	X (400'-600')
3) Ground Elevation Above Mean Sea Level (Coverage Effectiveness)	C (380')	* (470')	C (310')	* (450')	C (420')
4) Favorable Site Area and Terrain for Construction	*	*	C (limited area)	X (limited area)	X (limited area)
5) Accessibility for Service Vehicles	*	C (300' driveway required)	X (stream crossing)	*	*
6) Proximity to Natural Gas & Electric Service	X	*	X	C	X
7) Visual Impact on Adjacent Neighborhood	C (open fields & adj. res. lots)	* (screened by hill & woods)	C (nearby res. lots)	X (proximity to nearby res. lots)	X (proximity to nearby res. lots)
8) Important Alternative Use(s)	X (present use for recreation)	* (none)	* (none)	X (present use for recreation)	X (present use: DPW garage)
9) Proximity to Historic or Cultural Area	C (one historic dwelling nearby)	* (none)	* (none)	X	X

KEY to symbols above:
 * - Favorable Characteristics
 C - Conditionally Acceptable
 X - Significant Problems

(August 2013/JH)