

# Connecticut Siting Council

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APPLICATION OF CELLCO PARTNERSHIP  
D/B/A VERIZON WIRELESS



COVENTRY NW  
FOLLY LANE  
COVENTRY, CONNECTICUT

DOCKET NO. \_\_\_\_\_

JUNE 28, 2017

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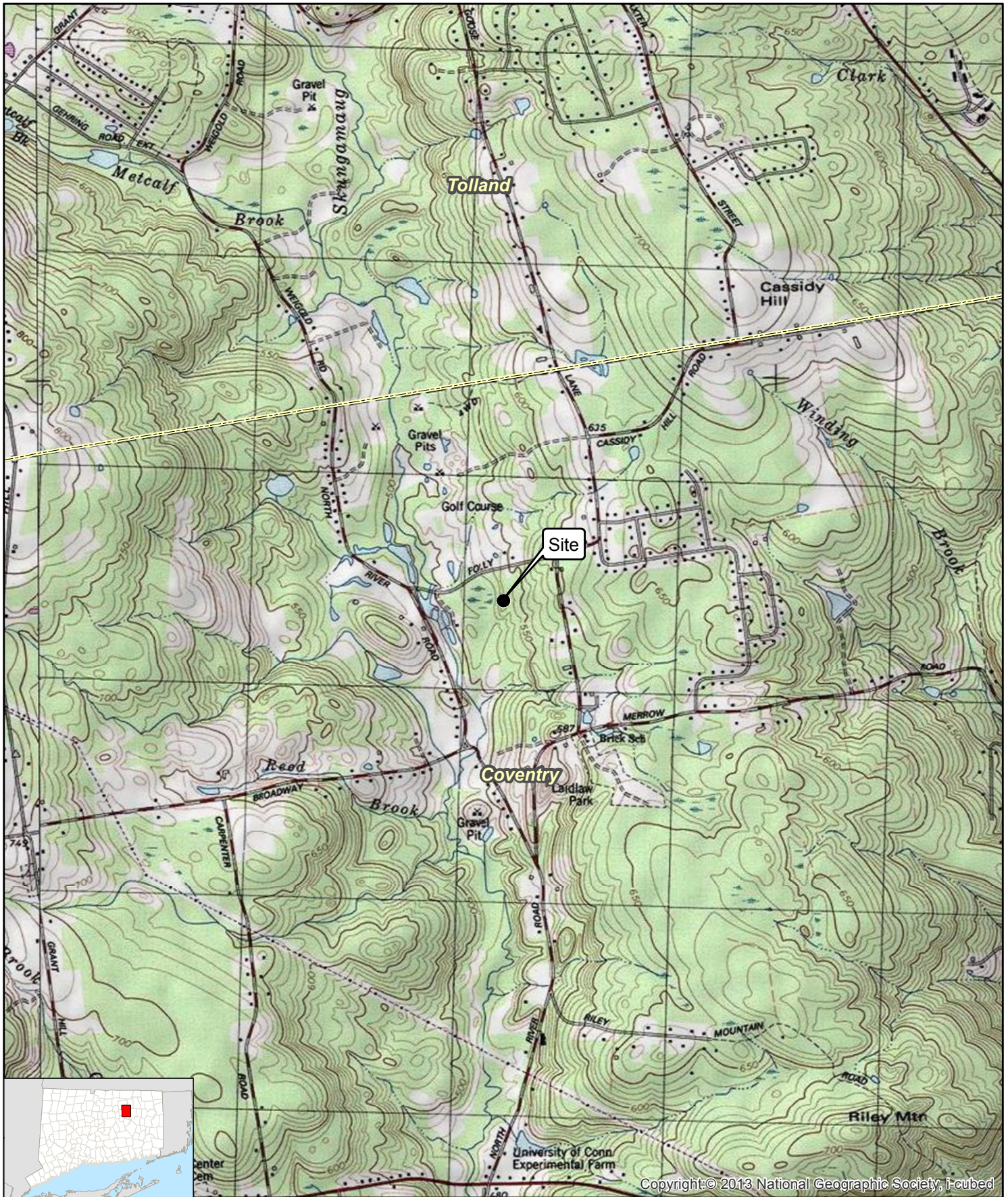
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## EXECUTIVE SUMMARY

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (“Applicant”) proposes to construct a wireless telecommunications facility on a 24.2-acre parcel on a portion of the Skungamaug Golf Course, south of Folly Lane in Coventry, Connecticut (the “Property”). The Property is owned by John Motycka. Cellco refers to this cell site as its “Coventry NW Facility”.

The Coventry NW Facility will provide improved wireless voice and data services in northerly portions of Coventry and southerly portions of Tolland, Connecticut. The Coventry NW Facility will provide improved “coverage” along portions of Routes 195 and 44, Goose Lane and local roads in the area and capacity relief to Cellco’s existing Coventry North and Tolland cell sites.

Cellco proposes to construct a 140-foot monopole tower within a 40’ x 60’ fenced compound and 100’ x 100’ leased area in the northeasterly portion of the Property. Cellco would install nine (9) panel-type antennas and nine (9) remote radio heads on an antenna platform at the top of the tower. Cellco’s antennas will extend above the top of the tower to a height of approximately 143 feet above grade. Cellco’s equipment cabinets and a propane-fueled back-up generator would be located on a 12’ x 26’ steel platform, with a canopy roof installed on the ground adjacent to the tower. A 500 gallon propane tank will be installed on a 4’ x 8’ concrete pad in the corner of the facility compound. Vehicular access to the compound would extend from Folly Lane over a portion of an existing gravel driveway serving the golf course maintenance area. Utilities would extend from existing service along Folly Lane.

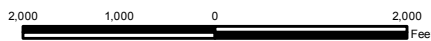


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**Legend**

- Site
- Municipal Boundary

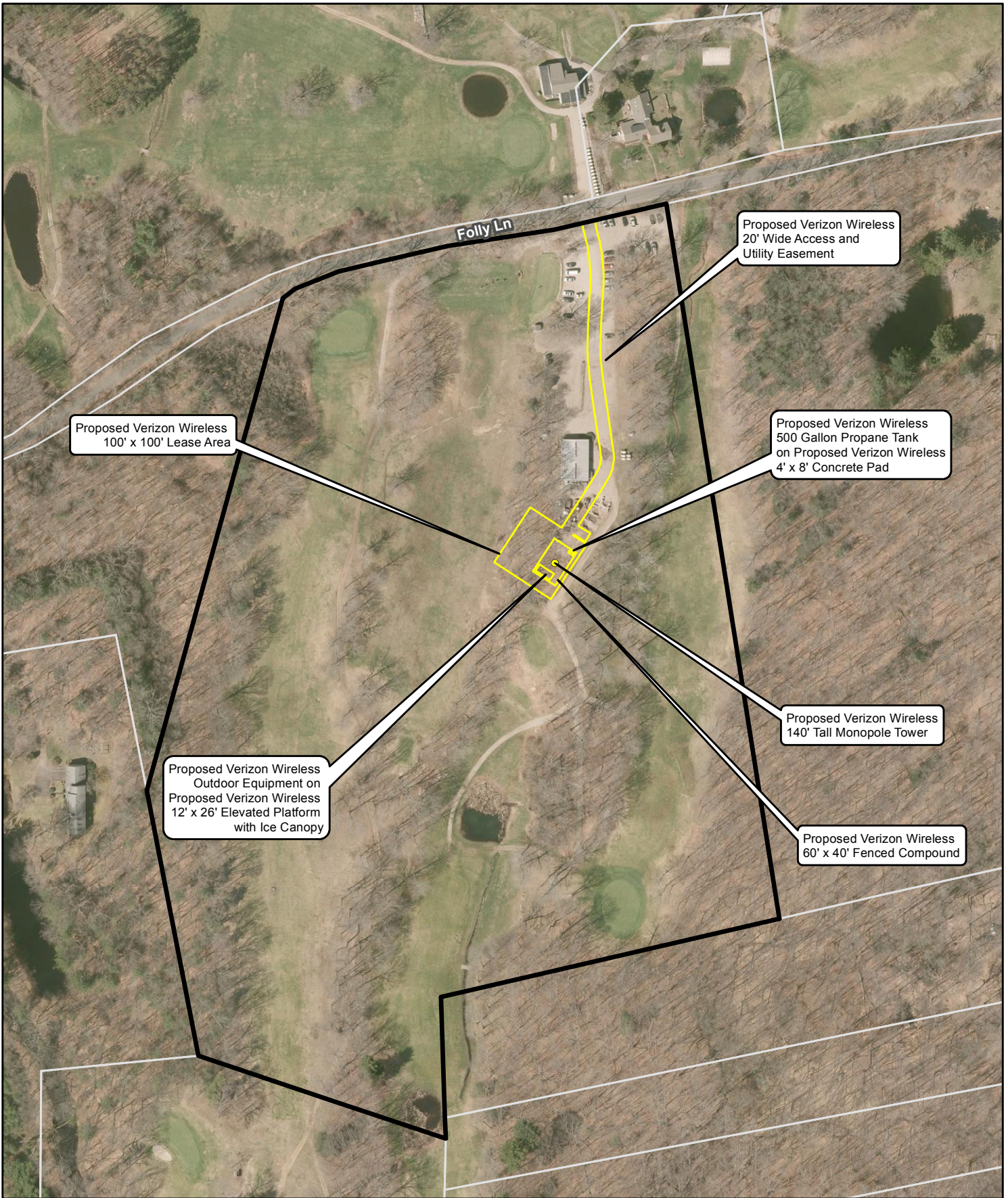
Map Notes:  
 Base Map Source: USGS 7.5 Minute Topographic  
 Quadrangle Map, Coventry, CT (1983)  
 Map Scale: 1:24,000  
 Map Date: April 2017






**Site Location Map**

Proposed Wireless  
 Telecommunications Facility  
 Coventry Northwest CT  
 Folly Lane  
 Coventry, Connecticut





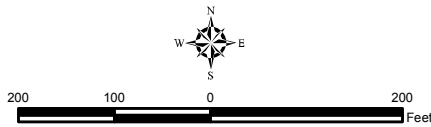
**Legend**

-  Proposed Monopole Tower
-  Proposed Facility Layout
-  Subject Property

**Site Schematic**

Proposed Wireless  
Telecommunications Facility  
Coventry Northwest CT  
Folly Lane  
Coventry, Connecticut

**Map Notes:**  
Base Map Source: CT ECO 2016 Aerial Imagery  
Map Scale: 1 inch = 200 feet  
Map Date: April 2017



**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**IN RE:** :  
 :  
 **APPLICATION OF CELLCO PARTNERSHIP** : **DOCKET NO. \_\_\_\_\_**  
 **D/B/A VERIZON WIRELESS FOR A** :  
 **CERTIFICATE OF ENVIRONMENTAL** :  
 **COMPATIBILITY AND PUBLIC NEED FOR** :  
 **THE CONSTRUCTION, MAINTENANCE** :  
 **AND OPERATION OF A WIRELESS** :  
 **TELECOMMUNICATIONS FACILITY OFF** :  
 **FOLLY LANE IN COVENTRY,** :  
 **CONNECTICUT** : **JUNE 28, 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 off Folly Lane in Coventry, Connecticut (the “Property”). Cellco identifies this cell site as its “Coventry NW Facility”. The proposed Coventry NW Facility, located on a portion of the



Skungamaug Golf Course, will consist of a 140-foot monopole tower in the northeast portion of a 24.2-acre parcel south of Folly Lane, adjacent to the golf course maintenance building. Cellco would install its antennas and remote radio heads on an antenna platform at the top of the tower. Cellco's equipment cabinets and a propane-fueled back-up generator will be installed on a 12' x 26' steel platform with a canopy roof. The tower, equipment platform and a 500 gallon propane fuel tank will all be located within a 40' x 60' fenced compound and 100' x 100' leased area.

Included in this Application, as Attachment 1 is a factual summary and project plans for the proposed Coventry NW 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 Coventry NW 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 June 22 and June 23, 2017, by Cellco in *The Chronicle* 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 Coventry NW Facility.

#### **A. Federal Policy**

In 1996, the United States Congress adopted the federal Telecommunications Act (the “Act”). (Pub. L. No. 104-104, 110 Stat. 56). The Act recognized, among other things, an important nationwide need for high-quality wireless telecommunication services of all varieties. The Act also expressly promotes competition and seeks to reduce federal, state and local government regulation in all aspects of the telecommunications industry in order to foster lower prices for consumers and to encourage the rapid deployment of new and advanced wireless service and technologies.

Because the FCC and the United States Congress have determined that there is a pressing public need for high-quality wireless telecommunications service nationwide, the federal government has preempted the determination of public need by states and municipalities, including the Council, with respect to public need for the service to be provided by the facility described in this Application. In addition, the FCC has promulgated regulations containing technical standards for wireless systems, including design standards, in order to ensure the technical integrity of each system and nationwide compatibility among all systems. State and local regulation of these matters is likewise preempted. The FCC has also exercised its jurisdiction over and preempted state and local regulation with respect to radio frequency emission and interference issues by establishing regulations and requirement in these areas as well.

Pursuant to FCC authorizations, Cellco has constructed and currently operates a wireless system throughout Connecticut. This system, together with Cellco’s system throughout its New

England and national markets, has been designed and constructed to operate as one integrated, contiguous system, consistent with Cellco's business policy of developing compatibility and continuity of service on a regional and national basis.

Recognizing the public safety benefits that enhanced wireless telecommunications networks can provide, the United States, Congress also enacted the Wireless Communications and Public Safety Act of 1999 to promote and enhance public safety by making 911 the universal emergency assistance number, furthering the deployment of wireless 911 capabilities and further encouraging the construction and operation of seamless, ubiquitous and reliable wireless networks. In 2004, Congress enacted the Enhanced 911 (E-911) Act for the specific purpose of enhancing and promoting Homeland Security, public safety and citizen activated emergency response capabilities. These goals and other related responsibilities imposed on wireless service providers can only be satisfied if Cellco maintains a ubiquitous and reliable wireless network.

In December of 2009, President Obama issued Presidential Proclamation No. 8460 (74 C.F.R. 234 (2009)), which recognizes the need to protect the nation's "critical infrastructure", including, among others, "cellular phone towers". In 2010, the FCC developed a national broadband policy<sup>1</sup> 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.<sup>2</sup>

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

<sup>2</sup> 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 Tolland 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 Coventry NW Facility would not enlarge Cellco's authorized service area.

**B. Public Need and System Design**

**1. Need for the Coventry NW Facility**

As noted above, the Act has pre-empted any state or local determination of public need for wireless services. In Tolland 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 portions of Coventry and the surrounding towns from its existing Tolland 2, Tolland, Mansfield North, Coventry North, Columbia, Bolton and Bolton East cell sites. Plots showing the extent of reliable wireless service in the area reveal significant "coverage gaps" in all of Cellco's operating frequencies. Significant portions of these

coverage gaps will be filled by service from the Coventry NW Facility. (See Attachment 6).<sup>3</sup> In addition to the coverage benefits, the proposed Coventry NW Facility will provide capacity relief to Cellco's Coventry North (Gamma sector) and Tolland (Gamma sector) cell sites which are currently operating beyond their existing capacity limits.

## **2. Proposed Cell Site Information**

The proposed Coventry NW Facility would be located in the northerly portion of an approximately 24.2-acre parcel, a portion of the Skungamaug Golf Course, south of Folly Lane in Coventry. The Property is owned by John Motycka and is used for commercial/recreational purposes. The Coventry NW Facility will be located adjacent to the maintenance building at the golf course. At this location, Cellco would construct a 140-foot self-supporting monopole telecommunications tower. Cellco would install a total of nine (9) panel-type antennas and nine (9) remote radio heads on a triangular antenna platform at the top of the tower. Equipment associated with Cellco's antennas and a 25 kW propane-fueled back-up generator would be located on a 12' x 26' steel platform with a canopy roof. The tower, equipment platform and a 500 gallon propane fuel tank would be located within a 40' x 60' fenced compound and 100' x 100' leased area. Cellco's equipment cabinets would house radio receiving, transmitting, switching, processing and performance monitoring equipment. The battery system and generator will allow the facility to remain in operation if and when commercial power to the facility is interrupted. Once the cell site is operational, Cellco technicians will visit the cell site periodically for maintenance purposes.

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<sup>3</sup> Additional gaps in wireless service to the west of the Coventry NW Facility will be served by an additional facility that Cellco intends to install at 712 Bread and Milk Street in Coventry. At this location Cellco intends to share an existing 180-foot SBA tower. Cellco's Sub-Petition filing for this facility modification was filed on June 5, 2017.

Vehicular access to the proposed cell site would extend from Folly Lane over an existing gravel driveway a distance of approximately 520 feet to the cell site. This driveway currently provides access to the golf course maintenance facility and materials storage area. Utilities will extend from existing service along Folly Lane.

The proposed Coventry NW Facility would provide reliable wireless service to a 0.5 mile portion of Route 195; a 0.5 mile portion of Route 44; a 1.8 mile portion of Goose Lane, and an overall area of 10.28 square miles at 700 MHz frequencies; a 0.2 mile portion of Route 195; a 1.4 mile portion of Goose Lane, and an overall area of 8.67 square miles at 850 MHz frequencies; a 1.3 mile portion of Goose Lane, and an overall area of 3.98 square miles at 1900 MHz frequencies; and a 1.2 mile portion of Goose Lane, and an overall area of 3.83 square miles at 2100 MHz frequencies.

Cellco's existing surrounding cell sites include: *Coventry North* – antennas on an existing tower at 400 Riley Mountain Road in Coventry, located approximately 1.8 miles south of the proposed Coventry NW Facility; *Mansfield North* – antennas on an existing tower at 1725 Stafford Road in Mansfield, located approximately 2.2 miles northeast of the proposed Coventry NW Facility; *Tolland* – antennas on an existing tower at 5 Ruops Road in Tolland, located approximately 3.3 miles northeast of the proposed Coventry NW Facility; *Tolland 2* – antennas on an existing tower at 208 Reed Road in Tolland, located approximately 3.5 miles northeast of the proposed Coventry NW Facility; *Bolton* – antennas on an existing tower at 130 Vernon Road in Vernon, located approximately 4.9 miles northeast of the proposed Coventry NW Facility; *Bolton East* – antennas on an existing tower at 49 South Street in Bolton, located approximately 4.7 miles northwest of the proposed Coventry NW Facility; and *Columbia* – antennas on an

existing tower at 104 Bunker Hill Road in Andover, located approximately 5.8 miles south of the proposed Coventry NW Facility.

**3. System Design and Cell Site Equipment**

**a. System Design**

Cellco's wireless system in general and the proposed Coventry NW Facility, in particular, have been designed and developed to allow Cellco to achieve and to maintain high quality, reliable wireless service. The system design is capable of orderly expansion and is compatible with other wireless systems. The resulting quality of service compares favorably with the quality of service provided by conventional wireline telephone service. The wireless system is designed to assure a true cellular configuration of base transmitters and receivers in order to cover the proposed service area effectively while providing the highest quality of service possible.

Mobile telephone switching offices ("MTSOs") in Windsor and Wallingford are interconnected and operate Cellco's wireless systems in Connecticut as a single network, offering the subscriber uninterrupted use of the system while traveling throughout the State. This network is further interconnected with the local exchange company and long distance carrier networks.

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

**b. Cell Site Equipment**

The key elements of the cellular system are the two MTSOs located in Windsor and Wallingford and the various connector cell sites around the state. The major electronic components of each cell site are radio frequency transmission and receiving equipment and cell site controller



equipment. This equipment is capable of expanding in modules to meet system growth needs. The cell site equipment primarily provides for: message control on the calling channel; call setup and supervision; radio frequency equipment control; internal diagnostics; response to remote and local test commands; data from the mobile or portable unit in both directions and on all channels; scan receiver control; transmission of power control commands; rescanning of all timing; and commands and voice channel assignment.

In addition to the ground-mounted radio equipment, Cellco intends to install nine (9) panel-type transmit/receive antennas; nine (9) remote radio heads (RRHs); two (2) HYBRIFLEX™ fiber optic antenna cables; and a GPS antenna. Back-up power to the Coventry NW Facility will be provided by an on-site battery system and a 25 kW, propane-fueled generator. Specifications for Cellco's antennas, RRHs, antenna cables and back-up 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 in Coventry than the proposed facility described 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 Coventry NW Facility would satisfy this goal and provide high-quality reliable wireless service along portions of Route 195, Route 44, Goose Lane and other local roads, as well as residential land uses in the area and provide capacity relief to its existing Coventry North (Gamma sector) and Tolland (Gamma sector) 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 the existing (surrounding) towers listed, all of which are within approximately six (6) miles of the Coventry NW Facility location. These existing sites are identified on the coverage maps included in Attachment 6. The adjacent cell sites cannot, however, satisfy the coverage objectives for the Coventry NW 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 are available in northern Coventry. Cellco initiated a site search process for the Coventry NW cell site in March, 2015, and identified the Property, early in the process, as a viable candidate for a cell site. Cellco determined that an antenna height of 140 feet at this location would satisfy its wireless service objectives in the area.

## **2. Tower Sharing**

The Applicant will design the proposed tower and compound to be shared by a minimum of

four (4) wireless carriers, and the Town, or local emergency service providers, if a need exists. The tower itself will also be designed to be extended up to 20 feet in accordance with past requests from the Council and Federal law. This type of tower sharing arrangement would reduce, if not eliminate, the need for these other carriers or municipal entities to develop a separate tower in this same area in the future. As of the date of this filing, no other wireless carrier has expressed any interest in the Coventry NW Facility. The Town of Coventry Police Department is interested in sharing the Coventry NW Facility.

### **3. Overall Costs and Benefits**

Aside from the limited visual impacts discussed further below, the Applicant believes that there are no significant costs attendant to the construction, maintenance, and operation of the proposed cell site. In fact, the public will benefit substantially from its increased ability to receive high-quality, reliable wireless service in the Town of Coventry.<sup>4</sup> The Coventry NW 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 wireless service. Moreover, the proposed cell site would be part of a system designed to limit the need for additional cell sites in the future. The overall costs to the Applicant for development of the proposed cell site are set forth in Section III.D. of the Application.

### **4. Environmental Compatibility**

Pursuant to Section 16-50p of the General Statutes, in its review of the Application, the

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<sup>4</sup> 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.

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 Coventry NW Facility would be a part has been designed to meet the public need for high-quality, reliable wireless service while minimizing, to the extent possible, any potential adverse environmental impacts. In part because there are few, if any other adverse impacts, the primary impact of facilities such as this is visual. This visual impact will vary from location to location around a proposed tower site, depending upon factors such as vegetation, topography, the distance of nearby properties from the tower 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.” Attachment 9 contains Visibility Analysis prepared by All-Points Technology Corporation (“APT”) for the Coventry NW 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.

According to the Visibility Analysis, areas where the monopole tower would be visible above the tree canopy (year-round visibility) comprise approximately 77 acres, or 0.96 percent of the 8,042 acre study area. Year-round visibility of the proposed Coventry NW Facility tower appear to be limited to locations on the host property immediate vicinity (generally within 0.11

miles) of the Property north of Folly Lane, on the northerly portion of the golf course. Areas where seasonal views are anticipated comprise approximately 190 additional acres (3.3 percent of the 8,042 acre study area).

There are approximately five (5) residences within 1,000 feet of the Coventry NW Facility. The closest off-site residence is located at 62 Folly Lane, approximately 660 feet to the northeast. Weather permitting, the Applicant will raise balloons with a diameter of at least three (3) feet at the Coventry NW 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 Utilities Regulatory Authority, Agriculture, 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 Coventry NW 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 Migratory Birds & CT DEEP NDDB Reviews**

According to the Preliminary USFWS & NDDB Compliance Determination dated June 8, 2017, prepared by APT, one federally-listed threatened species is known to occur in the vicinity of

the Property documented as the *Northern Long-Eared Bat* (“NLEB”). For reasons discussed in the compliance determination, Cellco submits that the proposed Coventry NW Facility will not adversely affect the NLEB. The proposed Coventry NW Facility would also comply with the USFWS’ recommendation guidelines for reducing impacts to the migratory birds. Finally, no known areas of State-listed species exist on the most-recent DEEP/NDDDB maps in the location of the proposed cell site. (See Attachment 10).

**(2) Wetlands Inspection**

As discussed in Section III.C.5.d. below, the Coventry NW Facility compound, located adjacent to the Skungamaug Golf Course maintenance facility within a developed and disturbed area, is approximately 40 feet northwest of an on-site wetland area, identified as “Wetland 1”. Wetland 1 is a narrow, well confirmed intermittent stream located to the east of the existing gravel driveway servicing the maintenance facility and the proposed cell site. Considering the existing developed nature of the Property and the fact that there are no direct impact to Wetland 1 or its mature bordering vegetation, no adverse impacts to wetlands would be anticipated. (See Wetlands Inspection Report – Attachment 11).

**(3) State Historic Preservation Officer**

According to a Preliminary Historic Resources Determination prepared by APT for the Coventry NW 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 Coventry NW 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 that proposed in the Application. To ensure compliance with the applicable standards, Cellco has performed a general power density calculation for the proposed Coventry NW 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 Coventry NW Facility would remain well below (33.73%) 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 Coventry NW Facility. The operations at the Coventry NW 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 Coventry NW 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 Coventry NW Facility would be located on an approximately 24.2-acre parcel, a portion of the Skungamaug Golf Course owned by John Motycka. The Property is zoned General Residential (GR) 80.

**b. Plan of Conservation and Development**

The Town of Coventry Plan of Conservation & Development (Effective December 2009) (the "Plan"), does not identify telecommunications facilities as a land use consistent or inconsistent with the general planning and conservation principles or policies of the Town. Four (4) copies of the Plan were filed, in bulk, with the Council.

**c. Zoning Regulations**

According to the Coventry Zoning Map, the Property is located in the GR-80 zone. The Coventry Zoning Regulations recognize the Council's pre-emptive authority over the Coventry NW Facility. Generally, towers are permitted in all zones subject to approval of a Special Permit. Applicants are encouraged however, to locate towers in the Town's Commercial and Commercial/Agricultural zones.



**d. Inland Wetland and Watercourse Regulations**

The Coventry 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. Four (4) copies of the Coventry IWW Regulations were filed, in bulk, with the Council. Matthew Gustafson, Registered Soil Scientist with APT, conducted a field investigation and completed a Wetlands Inspection Report for the project. A copy of the Wetlands Inspection report is included in Attachment 11. Wetland 1 is a well confined intermittent stream just east of the existing gravel driveway serving the golf course maintenance area and southeast of the proposed facility compound. The proposed Coventry NW Facility would be located approximately 40 feet northwest of Wetland 1 within an existing disturbed/developed area. The existing gravel driveway is approximately 23 feet from the closest edge of Wetland 1. Given the existing developed nature of the area the proposed development would not result in a likely adverse impact to the wetland.

According to the Federal Emergency Management Agency Flood Insurance Rate Map (“FIRM”), Community Panel Number 090100010D (Effective June 11, 1982) the Coventry NW Facility would be located in Flood Zone C, an area of moderate flood hazard between 100 and 500 year flood zones. 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 February 22, 2017, Cellco representatives met with Town Manager John Elsesser and the Town’s Land Use Director, Eric Trott to commence the ninety (90) day

municipal consultation process. Mr. Elsesser and Mr. Trott received a copy of technical information summarizing Cellco's plans to establish a telecommunications facility as described above. At this meeting, Cellco discussed the aspects of the proposed Coventry NW Facility, the need for wireless service in northwest Coventry and the Connecticut Siting Council application process. At the request of Coventry Town officials, Cellco was asked to appear before the Town's Planning and Zoning Commission (PZC), who hosted a public information meeting regarding the proposed facility on April 10, 2017. Notice of this meeting was published in *The Chronicle* on March 27, 2017, and was sent to eight (8) abutting landowners. Cellco representatives presented the tower proposal to the Town PZC and members of the general public and answered questions from those in attendance. (*See Attachment 15*).

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

Attachments 10, 11, 12, 14 and 16 and Section III.C.7. of the Application describes consultations with state and federal officials regarding the proposed Coventry NW Facility.

**a. Federal Communications Commission**

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

**b. Federal Aviation Administration (FAA)**

As it does with all of its tower applications, Cellco conducted on air-space analyses for the proposed Coventry NW 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 16.

**c. United States Fish and Wildlife Service**

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

**d. Connecticut Department of Energy and Environmental Protection**

**(1) Natural Diversity Data Base**

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

**(2) Bureau of Air Management**

Under normal operating conditions, Cellco’s equipment at the Coventry NW Facility would generate no air emissions. During the loss of commercial power and periodically for maintenance purposes, Cellco would utilize a propane-fueled generator to provide emergency back-up power to the proposed cell site. Cellco’s back-up generator will be managed to comply with the “permit by rule” criteria established by the Connecticut Department of Energy and Environmental Protection (“DEEP”) Bureau of Air Management pursuant to R.C.S.A. § 22a-174-3b.

**e. Connecticut State Historic Preservation Officer**

*See* Section III.C.4.b.(3) above.

**D. Estimated Cost and Schedule**

**1. Overall Estimated Costs**

The total estimated cost of construction for the Coventry NW Facility is \$593,000. This estimate includes:

- |     |  |           |
|-----|--|-----------|
| (1) | Cell site radio equipment of approximately     | \$150,000 |
| (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 to six weeks after installation of the tower and equipment platform. 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 Coventry NW Facility will not have any substantial adverse environmental effects. A public need exists for high quality reliable wireless service in the Town of Coventry and throughout Tolland 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 Coventry NW Facility.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS

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