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December 18, 2017

BY E-MAIL AND FEDEX

Chairman Robert Stein
and Members of the Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket 476
Application for Certificate of Environmental Compatibility and Public Need
248 Hall Hill Road, Somers, Connecticut

Dear Chairman Stein and Members of the Council:

On behalf of the applicants please accept this letter in support of the Certificate Application in Docket No. 476. This letter is being submitted in accordance with the 30-day post-hearing time frame established by the Council for the receipt of any written comments. Our letter outlines the reasons why we believe the record in this proceeding supports approval of the proposed facility.

Coverage Objectives, Site Search & Public Need

The objective of a T-Mobile site in this area of the State is to provide reliable service along portions of State Route 186 and to nearby secondary and tertiary roads and surrounding areas in Somers, Connecticut. T-Mobile's radiofrequency ("RF") engineers establish site search areas where new wireless facilities are needed to address the public's inability to obtain reliable service in its wireless network. T-Mobile experiences gaps in coverage in Somers along State Route 186 and nearby neighborhoods and developed a search area to address the lack of reliable service in this area. T-Mobile's gaps in reliable service in this area are documented in this proceeding by models as well as dropped call data for nearby sites in the network as noted in the Applicants' responses to interrogatories. Notably, the two sectors immediately adjacent to the proposed coverage area, CTHA170C and CT111530B, have average VOLTE dropped call rates exceeding acceptable thresholds for reliable service with CT11530B averaging around 15%. In addition, data testing indicates that substandard or nonexistent data service is provided within the area identified as a need for this site.

Finding no existing towers or tall structures available in the area upon which to locate a new facility, T-Mobile teamed with Eco-Site to search for properties potentially available for the siting of a new tower facility. Other locations including the nearby state correctional facility were either not made available for a facility or could not provide the reliable service T-Mobile requires in this area.

As part of the proceeding, T-Mobile's RF engineer Mr. Scott Heffernan testified that the proposed tower site would provide the needed service to the area around Route 186 and

surrounding areas and will hand-off with existing T-Mobile facilities in the area. The RF testimony also established that, due to the location of existing sites and T-Mobile's need, a centerline height of 175 feet is the lowest acceptable height for the proposed location. T-Mobile plans to utilize both 2100 MHz and 700 MHz spectrum on this facility. However, since T-Mobile only holds a 5 MHz license in the 700 MHz band, the majority of traffic will be handled by the 2100 MHz coverage layer.

In addition to T-Mobile's testimony the Council also received comments from Tolland County 911 indicating that the public safety network in this area of the state needs a tower location in this same area of the state. While final details were not provided, Eco-Site as the proposed Certificate holder agreed to work with the agency to provide space at little or no cost as long as the installation is technically feasible and that does not require marking and lighting. Verizon also submitted correspondence to the Siting Council that while it has no current plans to build a facility in the area it does have an identified need and would be able to use the proposed facility at the 120' level.

Based on the evidence and information submitted to the Council, it is respectfully submitted that the public need for a new tower facility in this area of Somers to provide coverage where adequate and reliable coverage does not exist today is simply not at issue in this Docket. Moreover, it should be noted that no competent evidence or testimony was offered by other parties or intervenors to rebut T-Mobile's testimony on the subject of a public need for a new tower in this part of Somers.

The Tower Facility Will Have No Significant Environmental Impacts

Pursuant to CGS Section 16-50p, the Council is required to find and determine as part of a Certificate application any probable environmental impact of a facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity and fish and wildlife. It is respectfully submitted that the facility as proposed in this Docket will have no significant environmental effects on the resources listed in Section 16-50p of the General Statutes.

Potential Visual Effects

The record in this Docket demonstrates that the proposed tower facility will not have a significant visual impact on scenic resources or residences in the vicinity of the tower site. There are no state/municipal parks, recreation areas, conservation areas, trails, scenic byways/vistas, properties listed on the National Register of Historic Places, public schools or other places of known scenic importance located within the 1/2-mile study area. The visual consultant for the Application, Saratoga Associates, estimates that the proposed telecommunications tower will be directly visible to some degree from roughly 25-35 residential structures within the 1/2 mile study area. Photo simulations included in the Application demonstrate that while some near-field view will be created, much of the visibility will be at a distance where the project will be visually subordinate to other built structures in view. Notably, concealment techniques or other "stealth" approaches

would not mitigate views given the height and visual context of the tower and close or flush mounting of the antennas would require a higher height to accommodate T-Mobile's need.

Potential Impacts to the Natural Environment

Impacts to the natural environment from the proposed facility are minimal.

a. Wetlands, Watercourses, and Floodplains

As provided in the Application, the soils of the proposed compound were investigated and deemed not to be wetland soils. The proposed access drive does pass to the east and north of an area identified by the Town of Somers GIS as containing wetland soils in the area of an existing ditch and "dry pond". As discussed at the November 16, 2017 evidentiary hearing with the Council, a Development and Management plan can include silt socks or straw wattles along the southern and western side of the proposed gravel drive in lieu of a silt fence to provide an added measure of protection between the access drive and a potential area that can transmit water. As also discussed at the hearing the Applicants agreed to an additional precautionary measure of a seasonal construction restriction from February 15th to April 15th to protect any vernal pool species potentially present in the area of the facility. Given the limited nature of the development and these noted additional measures it is respectfully submitted that the proposed site will not have a significant adverse impact to the wetlands or vernal pool habitat, if present, on the host property.

b. Wildlife

While natural diversity NDDDB mapping for the area includes no areas of concern a separate review was conducted for presence of the long northern long-eared bat (NLEB). Review of available resources combined with the nature of the project indicate that while no impact to the NLEB is anticipated there is still a potential for an effect to the NLEB. However, any incidental take of the NLEB, if one occurs, is not prohibited by federal rules for applicable to this proposal.

No other wildlife issues have been identified in the course of investigations and as such it is respectfully submitted that the proposed facility will not significantly impact wildlife or any ecological balance in this area of Somers.

Other Environmental Considerations

There are no other relevant or disputed environmental factors for consideration by the Council in this Docket. The tower facility will comply with all public health and safety requirements. Additionally, since the facility is unmanned with few vehicle trips, there will be no impacts to traffic or air and the facility requires no freshwater nor does it produce any wastewater. As such, the Council should find and determine that the facility has few if any environmental effects.



Conclusion

The record before the Council demonstrates a public need for the facility by both FCC licensed carriers and for public emergency communications services. No competent evidence challenging the public's need for the tower to provide reliable wireless services was presented by any party or intervenor. The record also demonstrates a lack of any significant adverse environmental effects associated with its proposed tower facility.

Accordingly, for the reasons set forth herein and as more fully evidenced by the record in this Docket, a Certificate should be issued for the proposed facility.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Laub', with a long horizontal flourish extending to the right.

Daniel M. Laub

cc:

Steve Ruzzo, Eco-Site

Mark Richard, T-Mobile



CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and 15 copies of the foregoing was submitted electronically and by overnight delivery to the Connecticut Siting Council.

Dated: December 18, 2017

A handwritten signature in black ink, appearing to read 'D. Laub', is written over a horizontal line.

Daniel M. Laub