

February 21, 2018

Robert Stein, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 479 – Application Of Tarpon Towers II, LLC and Cellco Partnership d/b/a Verizon Wireless For A Certificate Of Environmental Compatibility And Public Need For The Construction, Maintenance And Operation Of A Wireless Telecommunications Facility At 380 Horace Street, Bridgeport, Connecticut**

Dear Chairman Stein and Members of the Council:

On behalf of Tarpon Towers II, LLC (“Tarpon”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”), please accept this letter in lieu of a Post-Hearing Brief, in support of the above-referenced application for the construction, operation and maintenance of a new telecommunications facility in Bridgeport, Connecticut.

On September 25, 2017, Tarpon and Cellco (collectively the “Applicant”) filed an application with the Siting Council (“Council”) for a Certificate of Environmental Capability and Public Need (the “Application”) to construct a wireless telecommunications facility (the “Bridgeport East Facility”) in the northerly portion of a 13.7-acre parcel at 380 Horace Street in Bridgeport, Connecticut (the “Property”). The Property is owned by MDL Realty LLC (“MDL” or the “Owner”) and is used for industrial purposes. The Bridgeport East Facility would provide Cellco customers with improved wireless voice and data telecommunications services along portions of Routes 1 and 127, as well as local roads in Bridgeport and Stratford. More significantly, the Bridgeport East Facility will provide capacity relief to Cellco’s existing East Bridgeport Relo, Bridgeport Washington Park and North Bridgeport 2 facilities, each of which is currently operating beyond their respective capacity limits.

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Facility Description

In accordance with its Land Lease Agreement with MDL, Tarpon proposes to construct and own a 90-foot monopole tower in the northerly portion of the Property within a 2,500 square-foot leased compound. The northerly portion of the Property is undeveloped and used, in part, for overflow parking for the Germania Schwaben Club (GSC), an adjacent use at 416 Horace Street.

Cellco would install antennas and remote radio heads on an antenna platform at the top of the tower. Cellco's antennas would extend Cellco's radio equipment and a 25 kW gas-fired back-up generator would be located on a 9'4" x 16' steel platform with a canopy roof located in the northwest corner of the 2,500 square-foot compound. Access to the tower site would extend from the end of Horace Street over the existing paved driveway on the Property and the adjacent GSC parcel, a distance of approximately 226 feet.

Public Need

The unrefuted evidence in the Docket No. 479 record reveals the existence of several small gaps in wireless service in each of Cellco's operating frequencies in northern portions of Bridgeport. These gaps cannot be filled by service from Cellco's existing surrounding cell sites. The proposed Bridgeport East Facility will fill these existing wireless service gaps, particularly along Routes 1 and 127 in Bridgeport and Stratford. To a more significant degree, the proposed Bridgeport East Facility will provide capacity relief to Cellco's existing East Bridgeport Relo, Bridgeport Washington Park and North Bridgeport 2 facilities which are currently operating beyond their existing capacity limits.

Nature of Probable Environmental Impacts

The record contains ample evidence to support a finding by the Council that the Bridgeport East Facility would not have a significant adverse impact on the environment at the Property or the surrounding area. The Applicant has presented evidence that the location and development of the Bridgeport East Facility will have no effect on historic or archeological resources; will not adversely impact federal or State listed, threatened or endangered species or State species of special concern; will not have any direct impact on any wetlands or watercourses on or near the cell site; will not be considered to be 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. This evidence remains unrefuted.

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Visual Impacts

Generally speaking, the primary impact of any telecommunications facility is visual. The overall area where some portion of the proposed Bridgeport East Facility tower may be visible year round (above the tree line), is conservatively estimated to be approximately 41 acres (0.51% of the 8,042-acre study area). Year-round views are generally limited to locations within 0.25 miles of the proposed facility. Seasonal views, through intervening trees and branches are anticipated to occur within an area of approximately 40 additional acres (a total of 1.0% of the 8,042-acre study area). There are 141 residences within 1,000 feet of the Bridgeport East Facility. The closest residence is located approximately 111 feet to the west at 110 Kingsbury Road.

While it may be impossible to screen all views of the Bridgeport East tower and facility compound, Cellco suggested that a landscaped screen, either near the compound fence or along the westerly boundary of the Property may be effective in reducing the visual impact associated with the lower portion of the tower and the ground-mounted facility improvements.

Public Input

Tarpon commenced its local input process back in August of 2015, and presented City officials with technical information about the tower proposal. As recommended by City officials, Tarpon also attempted to meet with the City's Neighborhood Revitalization Director ("NRD") and offered to host a Public Information Meeting for adjoining landowners. In the end, Tarpon's efforts to meet with the NRD were unsuccessful. The NRD did not respond to any of Tarpon's efforts.

The only person who appeared and spoke during the Council's Public Hearing on January 23, 2018, was Helen Losak, an elected member of the 138th District Democratic Town Committee. Ms. Losak's comments focused exclusively on health effects associated with radio frequency (RF) emissions. Cellco has demonstrated, in the Application, that the proposed Bridgeport East Facility will comply with established RF emission standards.

Reorientation/Relocation of the Facility Compound

During the pre-hearing site visit and at the evidentiary hearing, Council member Robert Hannon asked if the facility compound could be reoriented and shifted to the west to avoid having to remove (blast) an existing rock outcropping in the center of the proposed compound. Avoiding the need for blasting and the potential impacts such activity might have on adjoining properties and uses would be preferred. The Applicant expressed its willingness to explore an alternate facility compound location, to the west of the existing rock outcropping if the facility is approved. These options could be presented and discussed as a part of the Council's D&M Plan process.

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At the site visit, Council members also discussed whether there might be opportunities to relocate the tower compound to the east of the rock outcropping. A facility compound located to the east of the rock outcropping, however, would need to fit between the rock outcropping to the west, the adjacent GSC parcel (paved parking area) to the south and an access easement to the north and east. Tarpon is also willing to explore this option through the D&M Plan, if requested.

Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Bridgeport East Facility and that the environmental impacts from the proposed facility location would be limited and outweighed by the benefits to the public.

Sincerely,



Kenneth C. Baldwin

KCB/kmd
Copy to:

Keith Coppins (*via electronic mail*)
Brett Buggeln (*via electronic mail*)
Anthony R. Befera (*via electronic mail*)