

CONNECTICUT SITING COUNCIL
DOCKET NO. 397

IN THE MATTER OF:

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 AT
445 PROSPECT STREET, EAST WOODSTOCK, CONNECTICUT

APPLICANT'S POST-HEARING BRIEF

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EXECUTIVE SUMMARY

On December 9, 2009, 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 a 44-acre parcel located at 445 Prospect Street (“Property”) in East Woodstock, Connecticut (the “East Woodstock Facility”). The proposed East Woodstock Facility would provide for much needed wireless service along portions of Routes 197 and 169, as well as local roads in the East Woodstock area.

Facility Description

Cellco has presented the Council with three (3) alternative tower locations on the Property. The first alternative tower location, as proposed in the Docket No. 397 Application, is located in the northwest portion of the Property. At this site, Cellco would construct a 130 foot tower. The second alternative location, as discussed significantly at the March 11, 2010 public hearing, is located near several existing barn structures on the Property approximately 600 feet south of the first alternative location. At this site, Cellco would construct a 140 foot tower. The third alternative location, discussed primarily at the May 27, 2010 public hearing, is located in the southeast portion of the Property. At this site, Cellco would construct a 160 foot tower. Cellco would install up to fifteen (15) panel-type antennas on the approved tower and a 12’ x 24’ shelter on the ground near the base of the tower to house its radio equipment and a back-up generator.

Public Need

Cellco currently experiences significant gaps in both cellular and PCS coverage along Routes 197 and 169 in East Woodstock, between its existing Woodstock North cell site, Coatney

Hill cell site and Quinebaug cell site. The proposed East Woodstock Facility would provide reliable service along portions of Routes 197 and 169, as well as local roads in the area, at cellular and PCS frequencies. Cellco expects to roll out its LTE network in the near future.

Nature of Probable Impacts

The development of any of the three alternative cell sites currently under consideration would be minimal. Each alternative tower location would be developed in previously disturbed portions of the Property used for agricultural purposes by the property owner. The only potential adverse impact from the proposed tower involves “scenic values.” Visual impacts associated with the first and second alternative locations would be similar and limited to areas on the Property and in the immediate vicinity along Prospect Street. Visual impact of a facility at the third alternative location would be less intrusive than either the first or second alternative locations.

Conclusion

The evidence in the record clearly demonstrates that there is a need for the proposed East Woodstock Facility and that the environmental impacts from any of the proposed alternative facility locations would be minimal when balanced against its benefits. Therefore, the Council should approve the Application as submitted.

I. INTRODUCTION

On December 9, 2009, 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 “East Woodstock Facility”) at 445 Prospect Street in East Woodstock, Connecticut (the “Property”) (Cellco Exhibit 1 (“Cellco 1”). Cellco currently experiences significant gaps in coverage at both cellular and PCS frequencies along Routes 197 and 169 in East Woodstock between its existing Woodstock North cell site at 1825 Route 198 in Woodstock; Coatney Hill cell site at 215 Coatney Hill Road in Woodstock; and Quinebaug cell site at 702 Quinebaug Road in Thompson. These coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its Federal Communications Commission (“FCC”) license and to meet the demands of its wireless telecommunications customers. The East Woodstock Facility would provide for much needed coverage along Routes 197 and 169, as well as local roads in East Woodstock and satisfy Cellco’s coverage objectives. (Cellco 1).

II. PROCEDURAL BACKGROUND

The Council conducted an evidentiary and public hearing on the Application on March 11, 2010. (March 11, 2010 Transcript (afternoon) (“TR1”) at 2; March 11, 2010 Transcript (evening) (“TR2”) at 2). Prior to the afternoon session of the March 11, 2010 hearing, the Council and its staff visited the Property. At the Council’s request, Cellco caused a balloon with a diameter of approximately four (4) feet to be flown at the tower location proposed in the Application, and at

a second alternative approximately 600 feet south of the proposed location. (Cellco 1; Cellco 7 Resp.12). During the course of the March 11, 2010 hearing, Cellco was asked to investigate several additional alternative site locations on the Property. On May 24, 2010, at the Council's request, Cellco caused a balloon with a diameter of approximately four (4) feet to be flown at a third alternative site location in the southeast corner of the Property. The Docket No. 397 hearing was continued to May 27, 2010 and concluded on that same day. (May 27, 2010 Transcript ("TR3") at 2).

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.") and the Council's directives. (TR3 at 89-90). This brief evaluates the Application in light of the review criteria set forth in Section 16-50p of the Connecticut General Statutes and addresses several other issues raised throughout the course of this proceeding.

III. FACTUAL BACKGROUND

A. Pre-Application History

Cellco is licensed to provide cellular, PCS and LTE service throughout Connecticut. Cellco currently experiences significant PCS and cellular coverage gaps along portions of Routes 197 and 169 and local roadways in the East Woodstock area between its existing Woodstock North, Coatney Hill and Quinebaug cell sites. (Cellco 1).

Cellco began its search for an East Woodstock cell site in October of 2006. (Cellco 1, Tab 9). As a first step in its standard 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 coverage objectives. There are no such existing towers in the vicinity of the East Woodstock Facility that Cellco does not already share. Likewise, there are no existing non-tower

structures of suitable height in the area that can satisfy Cellco's objectives in East Woodstock. 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 and other environmental impacts of the facility can be reduced to the greatest extent possible. (Cellco 1 at 10-11, Tab 9; Cellco 7; Cellco 11, Cellco 22). Cellco selected the location for the proposed East Woodstock Facility in such a manner as to allow it to build and to operate a high-quality wireless system with the least environmental impact.

B. Local Contacts

The local input process for the Docket No. 397 application commenced on August 20, 2009, when Cellco representatives met with Woodstock's First Selectman Allan Walker regarding the East Woodstock Facility application. (Cellco at 19-20). At that meeting, Mr. Walker received copies of technical information summarizing Cellco's plans to establish a telecommunications facility at the Property ("Technical Report"). On October 26, 2009, Cellco representatives appeared before the Woodstock Telecommunications Task Force ("Task Force") to discuss the East Woodstock Facility. (Cellco at 19-20). Following the March 11, 2010 hearing and the Council's request that Cellco explore alternative tower locations on the Property, Cellco notified the First Selectman and the Task Force again to discuss these possible alternative sites. Cellco representatives met again with the Task Force on May 24, 2010 to discuss these alternative locations. (Cellco 25; TR 3 at 29-30).

C. Tower Sharing

Consistent with its practice, Cellco regularly explores opportunities to share its facilities with other wireless service providers. Cellco would design the approved tower so that it could be shared by other carriers. During the course of its meetings with municipal officials in Woodstock,

Cellco agreed to provide access to the tower, at no cost, to the Town and local emergency service providers. Cellco would also agree to make ground space in the facility compound available, if needed. (Cellco 1 at 11). Representatives of the Quinebaug Valley Emergency Service organization expressed an interest in sharing the East Woodstock Facility tower. (TR 3 at 86).

D. The East Woodstock Facility Proposal

Cellco has presented the Council with three (3) viable alternative locations for a telecommunications tower and related facility on the Property.

The proposed location, presented in the Docket No. 397 Application, is located in the northwest portion of the Property in an existing agricultural field ("Site 1"). At Site 1, Cellco would construct a 130' tower in the center of a 50' x 75' facility compound. At the top of the Site 1 tower, Cellco would install 15 panel-type antennas (six (6) cellular; six (6) PCS and three (3) LTE) each with their centerline at 130 feet above ground level ("AGL"). The top of the Cellco antennas would extend to an overall height of 134 feet AGL. (Cellco 1).

In response to Council interrogatories, Cellco provided the Council with information regarding a second alternative facility location ("Site 2"), approximately 600 feet south of Site 1, near several existing barn structures on the Property. At Site 2, Cellco would construct a 140' tower in the center of a 50' x 75' facility compound. At the top of the Site 2 tower, Cellco would install fifteen (15) panel-type antennas (six (6) cellular six (6) PCS and three (3) LTE) at a centerline height of 140' AGL. The top of the Cellco antennas would extend to an overall height of 144 feet AGL. (Cellco 14).

Following the Council's March 11, 2010 hearing, Cellco investigated several additional alternative cell site locations on the Property. Following this investigation, Cellco presented the Council with a third alternative facility location for its consideration ("Site 3"). Site 3 is located in

an open field in the southeast portion of the Property. At Site 3, Cellco would construct a 160' tower in the center of a 50' x 75' facility compound.. (Cellco 28). At the top of the Site 3 tower Cellco would install a total of fifteen (15) antennas (six (6) cellular six (6) PCS and three (3) LTE) with their centerline height at 160' AGL. The top of the Cellco antennas would extend to an overall height of 164 feet AGL. (Cellco 28).

At the approved location, Cellco would install its equipment inside a 12' x 24' single story shelter located near the base of the tower. This shelter would house Cellco's receiving, transmitting, switching, processing and performance monitoring equipment and the required heating and cooling equipment. A diesel-fueled back-up generator would be installed within a segregated room in Cellco's equipment shelter for use during power outages and periodically for maintenance purposes. (Cellco 1). The tower and equipment shelter would be surrounded by an 8-foot high security fence and gate. Vehicular access to Site 1 and Site 2 would extend from Prospect Street along a new gravel driveway, a short distance to each alternative cell site location. Access to Site 3 would extent from Prospect Street along an existing farm road in the southerly portion of the Property to the Site 3 alternate cell site. (Cellco 28).

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: (1) A public need for the facility and the basis of the need; (2) the nature of the probable environmental impact, including a specification of every significant adverse effect, whether alone or cumulatively with other effects, 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; (3) why the adverse effects or conflicts referred to in subdivision (2) of this subsection 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)(1). 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)(2), and then demonstrate that these impacts “are not sufficient reason to deny the application.” Conn. Gen. Stat. § 16-50p(a)(3). 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 the East Woodstock Facility

The first step in the review of the pending Application addresses the public need for the proposed 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. More recently, 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. (Cellco 1; Council Adm. Notice 7).

Cellco currently experiences significant gaps in cellular and PCS coverage along Routes 197 and 169 between its existing Woodstock North, Coatney Hill and Quinebaug cell sites. (Cellco 1, Tab 7). These existing coverage problems must be resolved in order for Cellco to continue to provide high-quality, uninterrupted and reliable wireless telecommunications service consistent with its FCC license and to meet the demands of its wireless telecommunications customers. The East Woodstock Facility described above, would provide reliable service to an approximately 3.5 mile portion of Route 197; an approximately 3.1 mile portion of Route 169 and an overall area of approximately 11.6 square miles at cellular frequencies; a 2.05 mile portion of Route 197; a 2.35 mile portion of Route 169 and an overall area of 8.3 square miles at PCS frequency; and an approximately 4.1 route portion of Route 197, on approximately 3.4 mile portion of Route 169 and an overall area of approximately 13.1 square miles at LTE frequencies. (Cellco 1).

As the Council is aware and as discussed at the hearing, Cellco holds licenses to provide cellular, PCS and LTE service in Windham County, Connecticut and proposes to deploy its licensed frequencies at the East Woodstock Facility. (Cellco 1). The cellular, PCS and LTE services Cellco plans to deploy, operate at different frequencies, and will allow customers to use the same cell site for voice and/or data services. By installing cellular, PCS and LTE antennas at the East Woodstock Facility, Cellco can also ensure that it has more capacity available to meet the growing demand of its customers for wireless voice and data services. (Cellco 1; Cellco 11; Cellco 23).

The record contains ample, written evidence and testimony that any of the three proposed tower locations on the Property would allow for the deployment of Cellco's cellular, PCS and LTE frequencies without interruption from dropped calls and interference. The East Woodstock Facility would be incorporated into a network design plan, intended to provide Cellco customers with reliable wireless service along portions of Routes 197 and 169, as well as along local roads in East Woodstock where coverage is currently unreliable or non-existent. (Cellco 1; Cellco 11; Cellco 23).

B. Nature of Probable Impacts

The second step in the statutory review procedure addresses the probable environmental impacts of the proposed facility and particularly the following factors:

1. Natural Environment and Ecological Balance

The proposed development of an East Woodstock Facility at Site 1, Site 2 or Site 3 has eliminated to the extent possible, impacts on the natural environment.

At Site 1 for example, all facility improvements would be located within a 50' x 75' compound area in an open agricultural field. Access to Site 1 would extend from Prospect Street over a new gravel driveway, extending approximately 345 feet to the cell site. Utilities would extend from existing above-ground service along Prospect Street. No trees would need to be removed to construct the Site 1 compound and access driveway. The limited construction activity at Site 1 would have a negligible environmental impact on the Property. (Cellco 1; Cellco 7).

At Site 2, all facility improvements would be located within a 50' x 75' site compound adjacent to several existing barn structures on the Property in areas previously disturbed and currently used for farming operations by the landowner. Access to Site 2 would extend from Prospect Street over a portion of an existing gravel driveway, which would be improved and

extended to the Site 2 compound. Utilities would extend from existing overhead service along Prospect Street. Construction of the site compound and access drive, including the installation of utilities may require the removal of some smaller trees in the area. The limited construction activity at Site 2 would have a negligible environmental impact on the Property. (Cellco 11; Cellco 14).

At Site 3, all facility improvements would be located within a 50' x 75' site compound. Access to Site 3 would extend from Prospect Street over an existing dirt and gravel farm road in the southwest corner of the Property. The access drive would extend a distance of approximately 1200 feet, to the Site 3 cell site location. Construction of the site compound and access drive to Site 3 and the installation of utilities would require limited tree removal. Similar to the other alternative locations under consideration, the limited construction activity at Site 3 would have a negligible environmental impact on the Property. (Cellco 28; Cellco 29; TR3 @ 24-26).

No evidence to refute any of these conclusions 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 installation of the proposed facility would be minimal or nonexistent.

First, the potential for the East Woodstock Facility towers to fall does not pose an unreasonable risk to health and safety. The proposed tower would be designed and built to meet Electronic Industries Association ("EIA") standards. Other than the proposed equipment shelter, there are no structures within the fall radius of the tower location at Site 1 or Site 3. A single barn structures is located within 140 feet of the base of Site 2 tower. The fall radius for each of the three alternative tower sites would remain entirely within the limits of the Property. (Cellco 1; Cellco 14; Cellco 28). The nearest off site residence is located approximately 297 feet to the west of the Site 1

facility; more than 500 feet northwest to the Site 2 facility; and 1244 feet south of the Site 3 facility. (Cellco 1; Cellco 28; TR3 at 87).

Second, worst-case potential public exposure to RF power density for operation of the East Woodstock Facility at the nearest point of uncontrolled access (the base of each tower) would be well within the FCC standard. Power density levels would drop off rapidly as distance from the towers increases.¹ (Cellco 1, Tab 1 p. 8).

Overall, the nature and extent of potential, adverse public health and safety impacts resulting from construction and installation of the East Woodstock Facility would be minimal or nonexistent. No evidence to refute this conclusion was presented to the Council.

3. Scenic Values

As noted in the Application, the primary impact of any tower 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 existing towers or other tall non-tower structures in or near the search area. Cellco currently maintains antennas on five (5) existing towers within six miles of the East Woodstock Facility. No existing non-tower structures of suitable height exist in East Woodstock. (Cellco 1, Tab 9).

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 would be reduced to the greatest extent possible. There are no commercial or industrial zoned areas proximate to the Property. Cellco explored the use of several

¹ Radio Frequency emissions levels for the Site 1 tower under worst case condition are at 27.3%, of the FCC standard; more than three times below the standard. The worst case emissions levels for the Site 2 and Site 3 locations, each with taller towers, would be below the 27.3% level for the 130 foot tall Site 1 tower.

alternative sites in the area. In each instance, these alternative locations were rejected. (Cellco 1, Tab 9).

Significant portions of the Property and the surrounding area are either heavily-wooded or sparsely developed with agricultural and residential uses along Prospect Street and Green Road. Cellco submitted a Visual Resource Evaluation Report prepared by VHB (“VHB Report”) as a part of the Application for Site 1 and supplemental visual reviews for the Site 2 and Site 3 locations. (Cellco 1; Cellco 10; Cellco 13; Cellco 22). VHB conducted a balloon float at the Site 1, Site 2 and Site 3 tower sites on the Property and field reconnaissance to assess visibility of each alternative. At Site 1, VHB determined that the proposed East Woodstock Facility tower would be partially visible above the tree canopy from approximately 167 acres, or just over 2 percent of the two mile radius (8,042-acre) study area. Most of this visibility occurs on the Property and the immediate area along Prospect Street. (Cellco 1, Tab 10). Areas where seasonal views are anticipated comprise an additional 102 acres, again, all located in the immediate vicinity of the proposed Site 1 tower location where areas are open and undeveloped.

At Site 2, VHB characterized the visual impacts of a 140’ tower to be similar to the proposed Site 1 tower, only shifted, somewhat, to the south. (TR1 at 29-32).

At Site 3, VHB determined that the 160-foot tower would be visible, year-round above the tree line from approximately 95 acres within the two mile radius study area. Overall, VHB determined that the Site 3 tower would be far less visible than either the Site 1 or Site 2 towers. (Cellco Exh. 22).

4. Historical Values

As it does with all of its tower applications, 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. Based on a review of the information submitted by Cellco, the State Historic Preservation Officer determined that the development of a telecommunications facility at the Property would have “no effect” on historic, architectural, archaeological or cultural resources listed on or eligible for the National Register of Historic Places. (Cellco 1, Tab 11). No evidence to the contrary was presented to the Council. Furthermore, Cellco has no reason to believe that there are any other impacts on historical values not addressed by the SHPO’s review.

5. Recreational Values

There are no recreational activities or facilities at the Property that would be impacted by development of the East Woodstock Facility. (Cellco 1).

6. Forests and Parks

There are no State Forests or Parks located within two miles of the Property. (Cellco 1). The tower, therefore, will have no impact on either of these resources. No evidence to refute this conclusion was presented to the Council.

7. Air and Water Quality

a. Air Quality.

The equipment at the site would generate no air emissions under normal operating conditions. During power outage events and periodically for maintenance purposes, Cellco would utilize an on-site diesel-fueled back-up generator to provide emergency power to the facility. The use of the generator during these limited periods would result in minor levels of emissions. Pursuant to R.C.S.A. § 22a-174-3, Cellco will obtain an appropriate permit from the Connecticut Department of Environmental Protection (“DEP”) Bureau of Air Management prior to installation of the proposed generator. (Cellco 1).

b. Water Quality.

The proposed East Woodstock Facility would not utilize water, nor would it discharge substances into any surface water, groundwater, or public or private sewage system. Dean Gustafson, Professional Soil Scientist with VHB, Inc., conducted field investigations and completed Wetlands Delineation Reports (the “Wetlands Reports”) for each of the alternative locations on the Property. According to the Wetlands Report, there are no wetlands or watercourses within or near the Site 1 or Site 2 facility compounds. The closest wetland area is located more than 450 feet east of Site 1 and more than 350 feet east of Site 2. (Cellco 1; Cellco 16). The Site 3 location would be located more than 100 feet to the east of the nearest wetland area on the Property. Improvements to the Site 3 access road would also require the improvement of an existing intermittent stream crossing. (Cellco Exh. 29). Due to the distance between site development activity and the closest wetland area and because erosion and sedimentation controls have been incorporated into project plans, construction and operation of the East Woodstock Facility will not result in any adverse impacts to nearby wetland resource areas. No evidence to refute these conclusions was presented to the Council.

8. Fish and Wildlife

As a part of its National Environmental Policy Act (“NEPA”) Checklist, Cellco received comments on the proposed facility from the U.S. Department of Interior, Fish and Wildlife Service (“USFWS”) and the Environmental and Geographic Information Center of the DEP. The USFWS has determined that there are no federally-listed or proposed, threatened or endangered species or critical habitat known to occur at the Property. Likewise, according to the DEP, there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species at the Property. (Cellco 1).

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

Following a determination of the probable environmental impacts of the proposed facility, Connecticut General Statutes § 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 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 towers involves “scenic values.” As the record overwhelmingly demonstrates, a tower at Site 1, Site 2 or Site 3 would have minimal impacts on scenic values in the area. (Cellco 1; Cellco 13; Cellco 22). These limited aesthetic impacts may be, and in this case are, outweighed by the public benefit derived from the establishment of the East Woodstock 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 the proposed East Woodstock Facility can be further mitigated by the sharing of the facility. Cellco would design each of the three alternative towers so that it could be shared by other carriers. During the course of its meeting with municipal officials in Woodstock, Cellco also agreed to provide access to the tower, at no cost, to the Town and to emergency service providers who operate in the Town.

In sum, the potential environmental impacts from the proposed East Woodstock 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 Connecticut General Statutes § 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 the proposed East Woodstock 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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