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February 4, 2022

***VIA FEDERAL EXPRESS AND
ELECTRONIC MAIL***

Melanie.bachman@ct.gov
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Ms. Melanie A. Bachman, Esq., Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1467.

Dear Attorney Bachman:

This office represents Barrett Outdoor Communications, Inc. (“Petitioner”). On behalf of Petitioner, I have enclosed one original and fifteen hardcopies of its response to the second set of interrogatories issued by the Connecticut Siting Council.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

Enclosures

Updike, Kelly & Spellacy, P.C.

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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION OF BARRETT OUTDOOR COMMUNICATIONS, INC. FOR A DECLARATORY RULING THAT A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS NOT REQUIRED FOR THE RELOCATION OF A TELECOMMUNICATIONS FACILITY	:	PETITION NO. 1467
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	:	February 4, 2022

PETITIONER’S RESPONSES TO THE SECOND SET OF INTERROGATORIES BY THE CONNECTICUT SITING COUNCIL

Barrett Outdoor Communications, Inc. (“Petitioner”) respectfully submits the following responses and non-privileged documentation to the Second Set of Interrogatories issued by the Connecticut Siting Council (“Council”) in connection with the above-captioned matter.

107. *Response to Council Interrogatory No. 10 indicates BOC would install a whip antenna on behalf of the Connecticut-Rhode Island Red Cross Central Connecticut Territory for disaster communications; however, Site Plan Sheet C-2 depicts the installation of an Amateur Radio Omni-Whip Antenna. Clarify.*

The whip antenna shown on Sheet C-2 is the antenna referenced in the response to Request No. 10. Petitioner is not pursuing that aspect of the project at this time. Please see response to Request Nos. 10 and 55.

108. *How would backup power be supplied for the Connecticut – Rhode Island Red Cross Central Connecticut Territory disaster communications antenna?*

Please see response to Request Nos. 10, 55 and 107.

109. *Response to Council Interrogatory No. 92 indicates the purpose of the elevated platform is to minimize impact on the boat storage area. Will boats be stored underneath the elevated platform? What type of impact protection would be used to ensure boats or other equipment/vehicles do not damage the tower or elevated platform supports?*

The space under the elevated platform is not intended for boat storage. Petitioner utilized the elevated design to minimize encroachment on usable storage space.

Petitioner has proposed an eight foot high chain link fence with anti-climb mesh to enclose the platform and tower. Petitioner would place bollards along the fence at five foot intervals to protect the fence and the compound.

110. *Would the final foundation/tower design account for ground vibrations caused by Metro-North Railroad operations?*

Petitioner would provide the specifics of the site, including the immediate surroundings, to the tower/foundation vendor for incorporation into the design as appropriate.

111. *Referring to the Response to Council Interrogatory No. 41, at what tower height will the yield point be installed? What is the additional cost to design a yield point?*

The height of the yield point would be approximately twenty feet below the top of the tower to protect the UI transmission lines immediately to the north. The incremental cost of designing a yield point is not separately provided; rather, it is integral to the overall design cost.

112. *Site Plan C-1 depicts the telecommunications fiber connection as passing through the footprint of two buildings. Explain.*

The proposed telecommunications fiber connection would cross the roof of each of the two buildings. The connection extends from East Main Street overhead to the first building, crosses the roof, and continues overhead between the first and second buildings. From there, the connection runs down the side of the second building and continues underground to the proposed Relocated Facility.

113. *The Federal Aviation Administration (FAA) determination expires on March 3, 2022. At what point will BOC refile with the FAA? The FAA requests the completion and filing of Form 7460-2. What is the purpose of this form?*

In accordance with the FAA's determination, Petitioner will e-file a request for extension of the determination no later than February 16, 2022. The FAA Form 7460-2 is a supplemental notice. As indicated on the determination, Petitioner must file Form 7460-2, Part 2 within five days after the tower construction reaches its greatest height (if approved). Petitioner would also have to e-file Form 7460-2 if the project is abandoned while a determination is in effect.

114. *Referring to the Response to Council Interrogatory No. 87, what is the distance of the construction footprint to the MNRR outer rail? What procedures are required for construction personnel and/or equipment if work is within the 25-foot MNRR safety zone?*

The distance from the project limits of disturbance to the MNRR outer rail at the closest point is approximately thirty feet.

MNRR has adopted the following procedures related to construction:

- (1) work performed at a distance greater than twenty feet but less than twenty-five feet from the outer rail requires notification and coordination with MNRR and might require the implementation of a flag person.**

- (2) Work performed at a distance of less than twenty feet but more than fifteen feet from the outer rail requires a flag person.
- (3) Work performed at a distance of less than fifteen feet from the outer rail requires a flag person, “foul” time or track closure. “Foul” time is a method of establishing working limits on a controlled track in which the worker is notified by the train dispatcher that no trains will operate within a specific segment of controlled track until the worker clears the track.

115. *Referring to Council Interrogatory No. 24, provide a response to Part b) and Part c).*

These responses were inadvertently omitted from Petitioner’s response, dated January 11, 2022. The responses are as follows:

b. Any of the electric transmission line structures, or planned future replacement electric transmission line structures along the UI ROW, some of which are visible in Photo 27 of the Visibility Analysis;

Verizon chooses not to use electric transmission line structures due to restrictions on use imposed by the transmission line tower owners.

c. The billboard structure visible in Photo 34 of the Visibility Analysis?

This billboard is located at 335 Ferry Boulevard. This site is not a viable alternative because it is located too close (< 0.5 mile) to Verizon’s existing site Stratford 3 CT.

116. *Response to Council Interrogatory No. 9 indicates “the multi-story storage facility immediately to the northeast has been constructed.” Attachment 2 to the interrogatory responses indicates the multi-story storage facility is 5 stories.*

- a) What is the height of the storage facility building?*
- b) Was a rooftop facility considered as an alternative to a new tower facility?*
- c) Was the landowner approached regarding the possibility of locating a facility on the roof? If so, when and what was the outcome?*

a. The height of the storage facility building is approximately sixty feet.

b. A rooftop facility is not a feasible alternative. The parcels making up the redevelopment are under common ownership. The property owner was integral to the arrangements involving the location of the Relocated Facility as it related to the redevelopment. As a result of those arrangements, the storage facility building is not available. Relatedly, Stratford supports the location of the Relocated Facility as an integral part of the redevelopment. Please see Attachment 4 to the Petition.

c. Please see response to subpart b, above.

117. *Referring to the Response to Council Interrogatory No. 9?*

- a) Does BOC operate and/or own the relocated billboard?*
- b) What height is the relocated billboard?*
- c) What is the distance from the relocated billboard to the proposed tower site?*
- d) Was co-location of a facility on the relocated billboard considered instead of construction of a new tower facility? Explain*

a. Petitioner owns and operates the relocated billboard.

b. The top of the relocated billboard is approximately eighty-seven feet AGL.

c. The relocated billboard is approximately 910 feet from the proposed tower location.

d. The relocated billboard was not an option based on the redevelopment arrangements.

Respectfully submitted by,

BARRETT OUTDOOR COMMUNICATIONS,
INC.



By: _____

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