



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 8, 2022

Kenneth C. Baldwin, Esq.
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RE: **PETITION NO. 1547** – SBA Communications Corporation petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed replacement and extension of an existing telecommunications facility located at 277 Huckleberry Hill Road, Avon, Connecticut.

Dear Attorneys Baldwin and Eddy:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 29, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the December 29, 2022 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

MAB/RDM/laf

Petition No. 1547
Interrogatories to SBA
December 8, 2022

Project Development

1. What is the estimated cost of the proposed project?
2. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
3. Provide typical construction workdays and hours, and the anticipated duration of construction.
4. How long will it take to switch over AT&T's and T-Mobile's existing antennas/equipment to the replacement tower? When will the relocated equipment become operational? Will customers experience service outages?
5. Would a temporary tower facility be required to maintain AT&T and T-Mobile service during the cutover of carrier equipment to the replacement facility?
6. What is the timeline for removal of the existing laminate wood tower?

Existing Facility Site

7. Referencing Petition p. 2, it states, "SBA acquired the existing facility from Sprint in 2012." Council records for the existing facility indicate Sprint transferred the Certificate to TowerCo on January 23, 2009, but there is no record of any subsequent transfer of the Certificate to SBA. Explain how SBA acquired the Certificate.
8. Provide photographs of the existing facility and the proposed compound expansion area. Use stakes to show the limits of the expansion area.
9. Provide the number of residences within 1,000 feet of the site.

Proposed Replacement Facility

10. Referencing pp. 1-2 and 4 of the Petition, Sprint has antennas at the 100-foot level of the existing facility that will be removed. Would the 100-foot level of the replacement facility remain vacant?
11. What is the maximum number of wireless carriers that the replacement tower can support?
12. Have any other carriers expressed an interest in locating at the replacement facility?
13. The site plan in Petition Attachment 5, Q&A 3, Question 6 shows a tower profile with antenna platforms and a standoff arm mount at the 120-foot level. This profile differs from the Petition Site Plans which show flush-mount antennas for AT&T and T-Mobile. Explain.
14. Petition Attachment 5, Q&A 2 states that the structure height is limited to 150 feet per the lease amendment. Would the replacement tower and foundation be designed to be expandable to a height of 150 feet?

Public Safety

15. Provide a rigorous cumulative far-field radio frequency analysis for the replacement facility that accounts for Cellco's and the Town's proposed equipment and all other entities equipment on the tower, accounting for a 6-foot tall person at ground level and the actual antenna patterns for the facility with a cumulative %MPE at or below 100%. Identify the distance from the tower with the highest cumulative %MPE.
16. The Connecticut State Building Code was updated effective October 1, 2022. Has the facility been designed to the updated code? If not, what changes are necessary to the design of the facility to comply with the updated code?
17. Does AT&T offer FirstNet services from the existing facility? Could the replacement facility accommodate any additional equipment that might be required to provide FirstNet services?
18. Referencing p. 2 of the Petition, the Town is working with the state to use the SBA replacement tower to augment coverage in the Connecticut Land Mobile Radio Network (CLMRN). What is the CLMRN, what agency manages the network and is the Town eligible to use the CLMRN? Explain.
19. Has the Town determined if they are locating on the proposed replacement facility? If yes, when will the Town locate on the replacement facility? Are all Town approvals in place to allow the installation of the municipal antennas? If no, what Town approvals are still necessary?
20. If the Town has not set a firm date for locating on the replacement facility, would SBA construct a 110-foot tower capable of supporting a 20-foot extension?
21. Provide emergency backup generator/fuel tank specifications and run times for the Town's installation. Identify fuel spill containment measures.
22. Would operation of proposed facility comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?
23. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
24. Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

Environmental

25. Petition p. 8 states the lower portion of the replacement tower may be visible through the trees from abutting residential properties during leaf-off conditions. Which properties might have these views? Why wouldn't the upper portion of the tower also be visible?
26. The Petition Visibility Analysis by Tower Engineering Professionals states vegetation may fully or partially obscure the replacement tower from residential areas. Would residential yards within a 0.5 mile of the site have year-round views of portions the tower above the tree canopy? If yes, which properties? What methodology was used to determine visibility from residential areas?

27. The Docket 297 visibility analysis for the 100-foot tower showed year-round visibility occurring from Route 179 west of the site and Huckleberry Hill Road east of the site. What analysis was conducted to determine if the proposed 130-foot replacement tower would be visible from these areas?
28. What effect, if any, would the replacement tower have on the Farmington River, a designated Partnership Wild & Scenic River?
29. Does SBA or the Town intend on painting the whip antennas light blue? Why was this color chosen?
30. Assuming the whip antennas extend above the tree canopy when viewed from an area, at what approximate distance would the whip antennas not be discernable? (e.g. 0.1 mile)
31. Would visibility of the proposed replacement tower be reduced if it was painted? If so, what colors are available that may reduce visibility? Would SBA be willing to paint the replacement tower and wireless carrier panel antennas/mounting equipment?
32. What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.
33. Did SBA consider a wood laminate finish for the replacement facility similar to the finish of the existing tower? If so, please provide costs related to this design.
34. Identify the nearest "Important Bird Area" as designated by the National Audubon Society?
35. Would the proposed replacement tower comply with the USFWS Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance and Decommissioning? (available at <https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf>)
36. How many acres of additional visibility would result from construction of the proposed replacement tower? Characterize the additional visibility from the surrounding areas.