STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP	:	DOCKET NO. 502
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	:	
118 NEWTON ROAD, WOODBRIDGE,	:	
CONNECTICUT	:	JUNE 30, 2021

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES

On June 9, 2021, the Connecticut Siting Council ("Council") issued Pre-Hearing

Interrogatories to Cellco Partnership d/b/a Verizon Wireless ("Cellco"), relating to Docket No.

502. Below are Cellco's responses.

General

Question No. 1

Referencing Application Attachment 4 of the letters sent to abutting property owners,

how many certified mail receipts were received? If any receipts were not returned, which owners

did not receive their notice? Were any additional attempts made to contact those property

owners?

Response

Cellco received return receipts from 12 of the 14 abutting property owners. Two letters (Elizabeth Craft at 110 Newton Road and Xiang Li at 15 Penny Lane) were returned by the Post Office marked "Unclaimed". The notice letters were resent to Elizabeth Craft and Xiang Li on

June 10, 2021 by First Class mail. On June 21, 2021, Counsel for Cellco received an email from Elizabeth Craft confirming her receipt of the notice letter. (*See* Exhibit 1).

Question No. 2

Referring to Application p. 21, approximately how many residents and town officials attended the January 30, 2021, virtual public information meeting? What concerns were raised and how were these concerns addressed?

Response

The Virtual Public Information Meeting (VPIM) was attended by approximately 70 people via Zoom, including Cellco's development team, members of the general public and Woodbridge municipal officials. Individuals who spoke expressed concerns for the placement of a tower in a residential area, health effects related to radio frequency ("RF") emissions and visual impacts of the tower. During the VPIM and for weeks following the VPIM, residents and public officials ask Cellco to consider alternative parcels in Woodbridge, Bethel and Seymour, Connecticut. All of these parcels are listed in the Site Search Summary, in Attachment 8 of the Application.

Tower in a Residential Area

As described in the application, a vast majority of all land in the Town of Woodbridge is zoned Residence A, a low-density residential zone with a minimum gross lot size requirement of 65,000 square feet. The only commercial, business or industrial zoned property in Town is located in the southeast corner of Woodbridge near Route 15 and the New Haven – Woodbridge town line. With the exception of sites located in the adjacent towns of Bethel and Seymour, all of the alternative tower locations presented by municipal officials or abutting landowners are also located in residential areas. All of the existing Cellco wireless service currently provided in northern portions of the Town of Woodbridge is provided by tower sites outside of Woodbridge, in the adjacent towns. The most efficient and sensible way to satisfy Cellco's current need for improved service in Woodbridge is to build a new tower site in Woodbridge.

Concerns for Health Effects Associated with RF Emissions

During the VPIM, Cellco explained that issues related to RF emissions and concerns for health effects is under the exclusive jurisdiction of the Federal Communications Commission (FCC). Attendees were told that the Council cannot deny an application for a wireless facility based on concerns for health effects from RF emissions as long as Cellco can demonstrate that the proposed facility will operate within the FCC safety limits. Cellco provided, in its Technical Report and again in the Application, evidence that the proposed facility will comply with the FCC standards. Notwithstanding these legal restrictions, Cellco invited Eric Swanson, PhD., a Physics Professor from the University of Pittsburgh to discuss RF emissions. A copy of Dr. Swanson's presentation materials and CV are included in Exhibit 2.

Visual Effects

During the VPIM, Mike Libertine walked through APT's preliminary visual assessment of a 140' tower at the project site. The predicted year-round visibility was limited to an approximately 18-acre area immediately around the subject Property. As described in the Application, after hearing from abutters and other residents in the area and from local officials, Cellco's RF Engineers performed a drive test at the proposed tower site to determine if the tower height could be reduced, thereby reducing the visual impact of the tower. After evaluating the drive test results, Cellco agreed to reduce the tower height to 100'. As described in the Application, this tower height reduction results in coverage deficiencies along a portion of Route 67 to the northwest of the subject site. Cellco believes that it can address this remaining problem area through the installation of a small cell facility targeted specifically to that area. (*See* Application p. 7). This reduction in tower height results in a reduction in year-round visibility from 18-acres to 11-acres.

Question No. 3

How will Cellco recover the cost of construction of the facility?

Response

The costs associated with providing Cellco customers with the nation's most reliable wireless service network, including the cost for development of network infrastructure (small cells and macro-cells), are paid for by the individuals, corporations and government entities that purchase Cellco's wireless service.

Question No. 4

How would the facility be decommissioned at the end of its useful life?

Response

If the proposed tower site is not needed in the future, the tower, its foundation, radio equipment, back-up generators and propane fuel tanks along with the concrete pads upon which they rest, and the perimeter security fence could all be removed from the site. Because no trees need to be removed to build the proposed tower and facility compound, site decommissioning would return the Property to its pre-development condition.

Site Search

Question No. 5

Referring to Application Attachment 8 – Site Search Summary, were properties investigated in 2014-2015, re-examined prior to submission of the application to the Council?

<u>Response</u>

Yes.

Question No. 6

In what year was the site search completed?

Response

The site search was completed in May of 2021.

Question No. 7

For properties that were rejected by RF engineers, what tower heights were modeled in these locations?

<u>Response</u>

Each of the sites investigated were modeled at a height of 180 feet.

Question No. 8

Why are more properties listed in Application Attachment 8 than in the Technical Report submitted to the Town?

Response

As discussed in the Applicant's response to Question No. 1 above, following the submission of the Technical Report and the VPIM, municipal officials and members of the public asked Cellco to explore numerous alternative towers sites. Several of the alternatives offered were previous evaluated but many were new locations not previously considered. On several of the larger parcels, Cellco considered multiple tower locations.

Question No. 9

Is Site #2, 19 Soundview Drive, a viable alternative?

Response

The parcel at 19 Soundview Drive is technically "viable" in that a tower of adequate height on this parcel would satisfy Cellco's wireless service objectives in Woodbridge. The parcel is approximately 1,000 feet to the west of the proposed tower site but maintains a ground elevation approximately 30-40 feet lower than the proposed tower site. Cellco anticipates that a tower of 130-140 feet in height would be needed at this parcel to match the coverage from the proposed 100-foot Woodbridge North 2 tower. In addition, a tower on this parcel may end up being closer to residences to the north than the proposed tower site and would require the removal of more trees than at the proposed tower site. Regardless, the owner made it very clear that he was not interested in hosting a tower at 19 Soundview Drive.

Question No. 10

Referring to the Technical Report Site Search Summary, why were the Town's properties at 46 Burnt Swamp Road and Meeting House Lane considered viable, but then subsequently rejected? Provide coverage plots from these locations.

Response

To be clear, as described in the Technical Report, it was Cellco's real estate representatives that identified the two Town parcels (46 Burnt Swamp Road and a parcel off Meetinghouse Lane) as "potentially viable" likely by virtue of their proximity to the proposed site and the Town's request that they be evaluated. Once these sites were evaluated by Cellco's RF Engineers it was very obvious that neither site would satisfy Cellco's wireless service objectives. Both of these parcels maintain ground elevations that are much lower than the proposed tower site (94 feet lower at Bunt Swamp Road and 169 feet lower at Meetinghouse Lane). The Meetinghouse Lane location is also more than 4,000 feet to the southwest of the proposed cell site. The combination of a lower ground elevation and a location much further from the target area were the principal reasons why the sites were rejected. The coverage plots requested are included in Exhibit 3.

Question No. 11

Provide detail as to why a series of small cell deployments on existing utility poles would not be a viable solution to provide coverage to the proposed service area.

Response

It may be theoretically and technically possible to install a large number of small cells or Distributed Antenna System nodes in the area that could closely match the coverage footprint of the proposed Woodbridge North 2 Facility (macro cell). Such an approach, however, is not economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes would utilize existing infrastructure (i.e. electric distribution poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other equipment (i.e. transformers, street lights and risers) that will limit Cellco's ability to use the pole. Structural limitations of the existing poles will limit Cellco's ability to deploy all of the equipment needed to provide service in all of its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is very difficult and, in many cases, impossible, making the service even more vulnerable to storm events. In areas where this existing infrastructure is not available, for example, along private roads or on private and municipal properties, property rights would need to be acquired and new poles would need to be installed. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Facility is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed facility. In an effort to be responsive to concerns raised by municipal officials and residents in

the area Cellco has significantly reduced the height of the tower by 40', to 100' at the proposed tower site. This height reduction results in the reduction in reliable service to the northwest of the tower site along a portion of Route 67. Cellco would attempt to address this service deficiency by installing a small cell in this general area. Even the use of a single small cell where a tower of sufficient height could meet its service objective, results in compromises to network reliability. Under the circumstances here in Woodbridge, however, Cellco has determined that this compromise would be acceptable.

Site/Tower

Question No. 12

Would any blasting be required to develop the site?

Response

Cellco does not anticipate the need for blasting. If the Council approves the Docket No. 491 application, Cellco will prepare a Geotechnical Survey of the tower site to determine the nature of sub-surface conditions.

Question No. 13

What is the area of disturbance required to develop the site?

Response

The total area of disturbance required for the development of the proposed Woodbridge North 2 Facility is approximately 16,000 square feet.

Question No. 14

Referencing Application Attachment 1, Sheet A-1, Compound Surface, the plan indicates the compound would have three inches of crushed stone over a layer of Mirafi fabric. How was the stone depth determined? Is it based on a code requirement, drainage design, geotechnical conditions, etc.? Explain.

Response

The 3-inch layer of crushed stone cover over a Mirafic filter fabric is the minimal depth for the subject site. This arrangement is generally intended to foster rainwater infiltration and is subject to change pending the outcome of a geotechnical report. The geotechnical report will be completed and would be included as a part of the Development and Management Plan is the Docket No. 502 facility is approved.

Question No. 15

What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)

Response

The wireless facility compound will be surrounded by an eight (8) foot tall chain link security fence and gate. The gate will be locked with access limited to the wireless carriers sharing the facility. Cellco's wireless equipment will maintain separate silent intrusion alarms systems which are monitored remotely. Climbing pegs on the lower portion of the tower will also be removed.

Question No. 16

Pursuant to CGS (3)(G), identify the safety standards and/or codes by which equipment machinery or technology that would be used or operated at the proposed facility.

<u>Response</u>

- 2012 International Building Code with the 2016 CT Building Code Amendments.
- National Electric Code (NFPA70).
- 2005 CT State Fire Safety Code with the 2009 Amendments.

- TIA-222-G-4 "Structural Standards for Steel Antenna Towers and Antenna Supporting Structures".
- Occupational Safety and Health Administration (OSHA).

Cellco will comply with these safety standards and codes as they may be updated over time.

Coverage/Capacity

Question No. 17

Would the proposed antennas be capable of offering 5G services or would a new antenna be required to transmit 5G once this service is deployed in this area?

Response

The proposed Woodbridge North 2 Facility would be capable of providing 5G wireless service.

Question No. 18

Referring to Application pp. 8-9, for each frequency, what portion of the site coverage footprint consists of new reliable wireless service?

<u>Response</u>

See table below.

Frequency (MHz)	700	850	1900	2100
New Coverage (square miles)	2.0	3.5	1.2	0.6

Question No. 19

How do Cellco's wireless service frequencies interact with each other?

Response

All of Cellco's licensed frequencies (700 MHz, 850 MHz, 1900 MHz, 2100 MHZ) are used to transmit both voice and data services. Cellco customers transfer seamlessly between Cellco's operating frequencies during handoff between cell sites. Handoff can also occur between frequencies at an individual cell site for load balancing purposes. Subject to availability at a particular cell site, frequencies can also be used together (a feature called "carrier aggregation") making more of the existing bandwidth available to a particular user.

Question No. 20

Would the proposed site be needed for coverage, capacity, or both? If the proposed facility is also needed for capacity, please respond to the following:

- a) Are any nearby wireless facilities (or sectors) nearing capacity limits? If so, what sites, frequencies, and sectors?
- b) Please include a projected exhaustion date for each of these sectors.
- c) Would the deployment of the proposed facility be sufficient to address these capacity concerns, or would an additional facility be required in the near term to off-load traffic?

Response

The Woodbridge North 2 Facility is a coverage site. The neighboring sites and sectors are not projected to reach their capacity limits for the foreseeable future.

Question No. 21

How would a reduction in tower height from the previously proposed 140 feet to 100 feet affect Cellco's coverage objectives in the area? Would an additional facility be required to provide wireless service to areas with inadequate service due to a reduced tower height? If so, in what areas?

Response

As discussed in the Application narrative, Section III.B.2. (Footnote 4), the reduction in antenna height from 140 feet to 100 feet does result in coverage deficiencies along a portion of Route 67 to the northwest of the Property. Cellco believes that it can resolve this service deficiency through the installation of a small cell facility targeted specifically to that area. While this is not the preferred approach to satisfy its wireless service objectives in Woodbridge, Cellco is trying to be sensitive to concerns raised by neighbors and municipal officials.

Question No. 22

What indicators did Cellco use to identify substandard service within the proposed service area? Provide supporting data if available.

Response

Cellco's drive test measurements show very weak to unusable signal on CT Route 63 and CT Route 67 near the intersection of the two and on the neighboring roads (*See* the drive test map included in <u>Exhibit 4</u>). In addition, Cellco has had more than 30 customer complaints about poor coverage in the vicinity of the proposed site in the last three years.

Question No. 23

Why do the coverage plots in Application Attachment 6 show coverage from Cellco's existing *Hamden* facility but the coverage plots within the Technical Report do not?

Response

Cellco still intends to decommission the Hamden cell site. A precise date for that decommissioning has not been set. Because the site will be decommissioned in the future the plots in the Technical Report depicted future coverage without Hamden. During the municipal consultation process and the VPIM a number of the neighbors expressed concerns about the exclusion of the Hamden site from Cellco's plots. We therefore decided to include the Hamden site on the plots submitted with the Application.

Question No. 24

In Docket 486 (refer to Council's findings of fact #57, #58, #59), Cellco represented that the decommissioning of Cellco's *Hamden* facility may be delayed until a new facility in eastern Woodbridge is developed. Does Cellco intend to decommission the *Hamden* facility if the proposed site is approved and constructed? Does the *Hamden* facility provide adequate service to the Docket 502 proposed service area? Please explain in detail.

Response

As mentioned above, Cellco intends to decommission the Hamden site at some point in the future. The Hamden site is at least 2.5 to 3 miles away from the proposed target area for the Woodbridge North 2 Facility. The existing Hamden cell site does not provide adequate service to the same area that would be served by the Woodbridge North 2 Facility. As illustrated by the drive test map submitted in response to Question 22, above, and from the coverage plots in Attachment 6 of the Application, existing service in Woodbridge is lacking today even with the Hamden facility on line.

Question No. 25

Have any other wireless carriers expressed an interest in co-locating on the proposed facility to date?

Response

No.

Backup Power

Question No. 26

What would be the respective run time for the backup generator before it would need to be refueled, assuming it is running at full load under normal conditions?

Response

Cellco intends to install a 30-kW propane-fueled generator at the proposed tower site. Under normal loading conditions, the proposed 30-kW generator could operate for approximately 120 – 168 hours (5-7 days) before refueling would be necessary.

Question No. 27

Would the battery backup be used to provide uninterrupted power and prevent a reboot condition? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?

Response

Yes, battery backup would provide uninterrupted power to the facility and prevent a "reboot" condition. The backup battery system is designed to keep the cell site operating for up to eight (8) hours.

Public Safety

Question No. 28

Will the proposed facility support text-to-911 service? Is additional equipment required for this purpose?

Response

Yes, the proposed Facility will be capable of supporting text-to-911. No additional cell site equipment is necessary to support this service.

Question No. 29

Would the proposed facility comply with the intent of the Warning, Alert and Response Network Act of 2006?

<u>Response</u>

Yes.

Question No. 30

Would Cellco's antennas comply with federal E911 requirements?

<u>Response</u>

Yes.

Question No. 31

Referring to Application Attachment 17, what type of aviation safety analysis was performed. Referring to the Connecticut Airport Authority comments dated June 8, 2021, is a

filing of Federal Aviation Administration Form 7460 required for this project?

Response

Attachment 17 to the Application contains a Federal Airways & Airspace Summary Report which utilizes the FAA airspace modeling tool. According to the report, notification of the FAA is not required.

Environment

Question No. 32

What is the distance from the site to the Audubon designated West Rock Ridge Important Bird Area?

Response

The West Rock Ridge Important Bird Area is located 1.9 miles to the east of the proposed

Woodbridge North 2 tower site.

Question No. 33

What facility equipment would emit audible noise during site operation? Would the proposed facility comply with Department of Energy and Environmental Protection (DEEP) noise control standards at the property boundaries?

Response

The combined noise emitted from the proposed generator and equipment cabinets is estimated to be 51.6 dBA. Most of the noise emissions would emanate from the back-up the generator when it is exercised (once every two weeks) during daytime hours. Noise from the equipment cabinets will be produced by the equipment cooling fans and is minimal. *See* noise emission summary below.

Equipment	Application Factor dBA	Quantity	Distance to the nearest property line (ft)	Combined dBA
Generator	57 dBA @ 23ft	1	43	51.6
Battery Cabinet	50dBA & 3ft	1	50	25.2
Equipment Cabinet	50dBA & 3ft	1	50	25.2
Combined dBA				51.6

The maximum allowable noise emitted for developed residential districts per the Town of Woodbridge noise ordinance is 61dBA during the day and 51 dBA during the night.

Question No. 34

Referring to Application Attachment 9 – Visibility Assessment, revise Table 1 to include a column that estimates how much of the tower is visible in each photograph (in feet).

Response

The table included as <u>Exhibit 5</u> and titled "CSC Docket No. 502 Interrogatory Answer 34" includes a revised table that includes a column with the estimated height of the tower that is visible in each photograph. As noted on the table, the majority of seasonal photos the tower would be visible within the tree line in leaf-off conditions.

Question No. 35

Referring to Application Attachment 9 – Visibility Assessment p. 6, how many residences within 0.25 mile of the site may have year-round views? Please characterize the views from these residences.

<u>Response</u>

Year-round views are anticipated from eight (8) residences, including the residence on the host parcel, within 0.25 mile of the proposed Woodbridge North 2 Facility. Year-round views would occur from the seven (7) additional residences, similar to the views simulated in photos 2, 15, and 16 in Attachment 9 of the Application.

Question No. 36

What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.

Response

A "monopine" tower design could be considered as an option at this site because there are numerous stands of conifers in the vicinity and a "tree tower" would assist in softening views from many locations, particularly when the leaves are off the deciduous trees. However, closer year-round views (similar to Photos 1 and 15 in Attachment 9) would not have the advantage of surrounding vegetation for context and may actually experience a greater visual impact with the monopine design due to its wider lateral spread.

Question No. 37

Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

- 1. wetlands, watercourses and vernal pools;
- 2. forest/forest edge areas;
- 3. agricultural soil areas;
- 4. sloping terrain;
- 5. proposed stormwater control features;
- 6. nearest residences;
- 7. Site access;
- 8. tower/compound;
- 9. clearing limits/property lines;
- 10. mitigation areas; and
- 11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo

location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

Response

See <u>Exhibit 6.</u>

CERTIFICATION OF SERVICE

I hereby certify that on this 30th day of June, 2021, a copy of the foregoing was sent, via

electronic mail, to the following:

Ira W. Bloom, Esq. Berchem Moses PC 1221 Post Road East Westport, CT 06880 ibloom@berchemmoses.com

Nicholas R. Bamonte, Esq. Berchem Moses PC 1221 Post Road East Westport, CT 06880 nbamonte@berchammoses.com

Gerald Weiner, Esq. Town Attorney Woodbridge Town Hall 11 Meetinghouse Lane Woodbridge, CT 06525 <u>gweiner@aol.com</u>

The Honorable Beth Heller First Selectman Woodbridge Town Hall 11 Meetinghouse Lane Woodbridge, CT 06525 <u>bheller@woodbridgect.org</u>

Keith R. Ainsworth, Esq. Law Offices of Keith R. Ainsworth, Esq., LLC 51 Elm street, Suite 201 New Haven, CT 06510-2049 Keith.ainsworth@live.com Joel Z. Green, Esq. Linda P. Laske, Esq. Law Offices of Green and Gross, P.C. 1087 Broad Street Bridgeport, CT 06604 jgreen@gglaw.net LLaske@gglaw.net

Kunig MM

Kenneth C. Baldwin

EXHIBIT 1

KENNETH C. BALDWIN

280 Trumbull Street Hartford, CT 06103-3597 Main (860) 275-8200 Fax (860) 275-8299 kbaldwin@rc.com Direct (860) 275-8345

Also admitted in Massachusetts and New York

June 10, 2021

Xiang Li 15 Penny Lane Woodbridge, CT 06525

Re: Cellco Partnership d/b/a Verizon Wireless - Proposed Telecommunications Facility Woodbridge, Connecticut

Dear Mr. Li:

The enclosed letter was sent to you on May 11, 2021, certified mail return receipt requested. This letter was returned by the Post Office marked "Unclaimed".

Please contact me if you have any questions.

Sincerely,

Kunig mm

Kenneth C. Baldwin

KCB/kmd Attachment

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280 Trumbull Street Hartford, CT 06103-3597 Main (860) 275-8200 Fax (860) 275-8299 kbaldwin@rc.com Direct (860) 275-8345

Also admitted in Massachusetts and New York

May 11, 2021

Via Certified Mail, Return Receipt Requested

Xiang Li 15 Penny Lane Woodbridge, CT 06525

Re: Cellco Partnership d/b/a Verizon Wireless – Proposed Telecommunications Facility at 118 Newton Road, Woodbridge, Connecticut

Dear Mr. Li:

Cellco Partnership d/b/a Verizon Wireless ("Cellco") will be submitting an application to the Connecticut Siting Council ("Council") on or about May 13, 2021, for the construction of a new telecommunications facility in the Town of Woodbridge, Connecticut.

The proposed facility would consist of a new 100-foot monopole tower in the western portion of a 6.01-acre parcel at 118 Newton Road in Woodbridge (the "Property"). The tower, radio equipment, a backup generator and a propane fuel tank will be installed within a 50' x 50' fenced facility compound. Access to the facility would extend from Soundview Drive. Site plan drawings for the proposed facility are attached for your review. The location and other features of the proposed facility, including tower height, are subject to change under the provisions of Connecticut General Statutes § 16-50g et seq. and 47 U.S.C. § 1455e.

State law provides that owners of record of property which abuts a parcel on which a facility is proposed to be located must receive notice of the submission of this application. This notice is directed to you either because you may be an abutting land owner or as a courtesy notice.

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Boston | Hartford | New York | Providence | Stamford | Albany | Los Angeles | Miami | New London | rc.com

May 11, 2021 Page 2

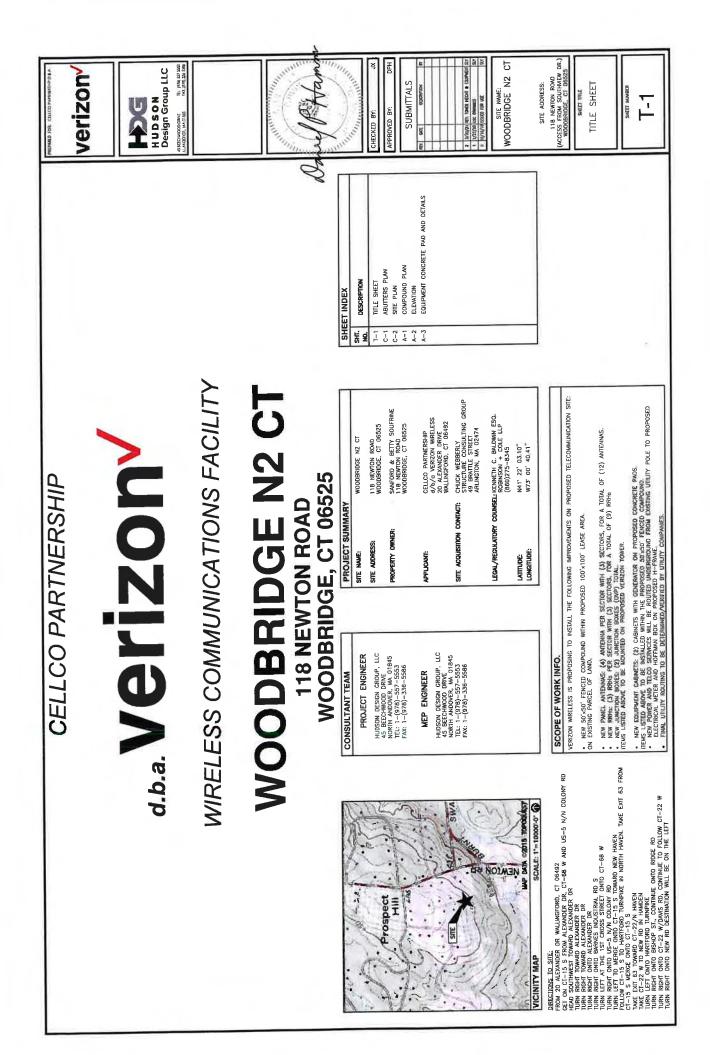
If you have any questions concerning the application, please direct them to either the Connecticut Siting Council or me. My address and telephone number are listed above. The Siting Council may be reached at its New Britain, Connecticut office at (860) 827-2935.

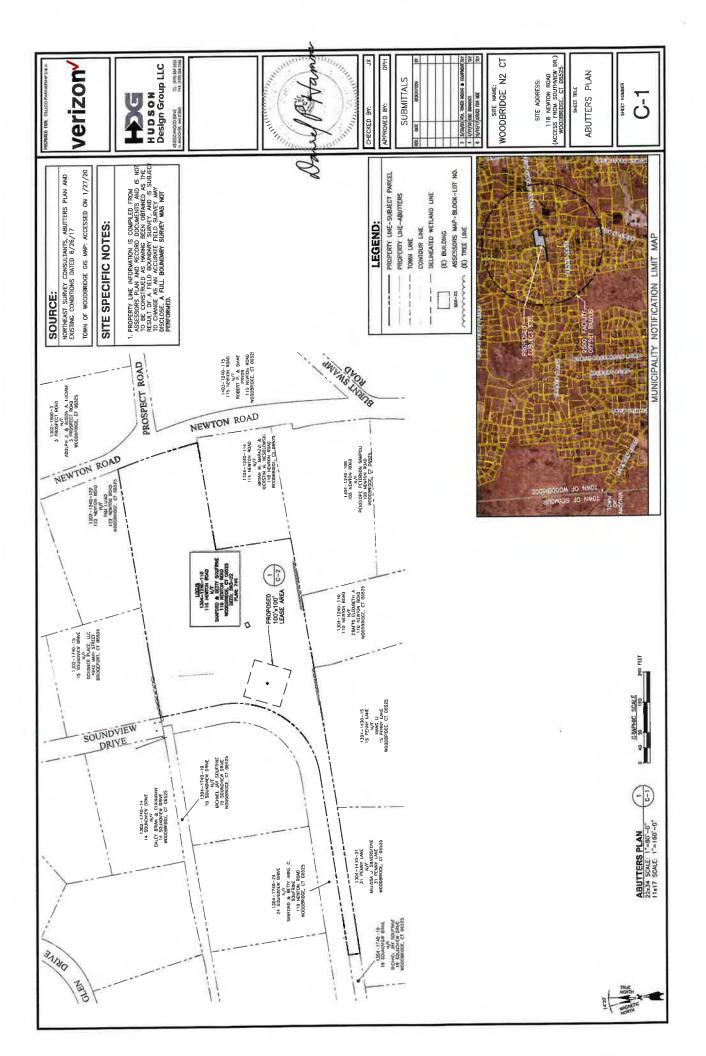
Very truly yours,

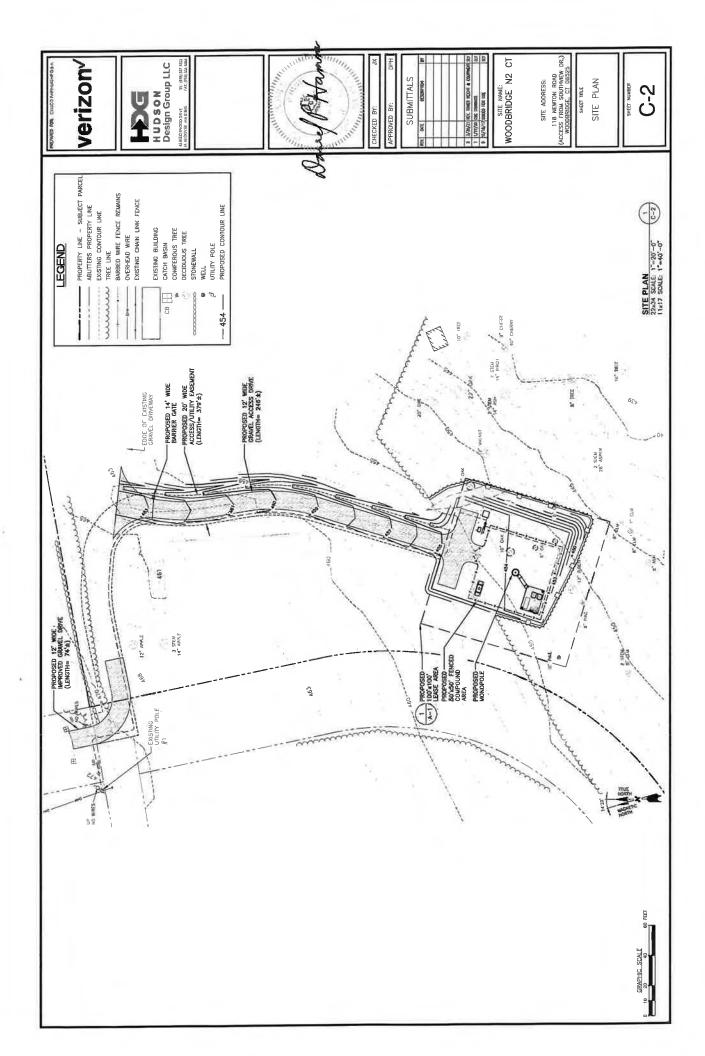
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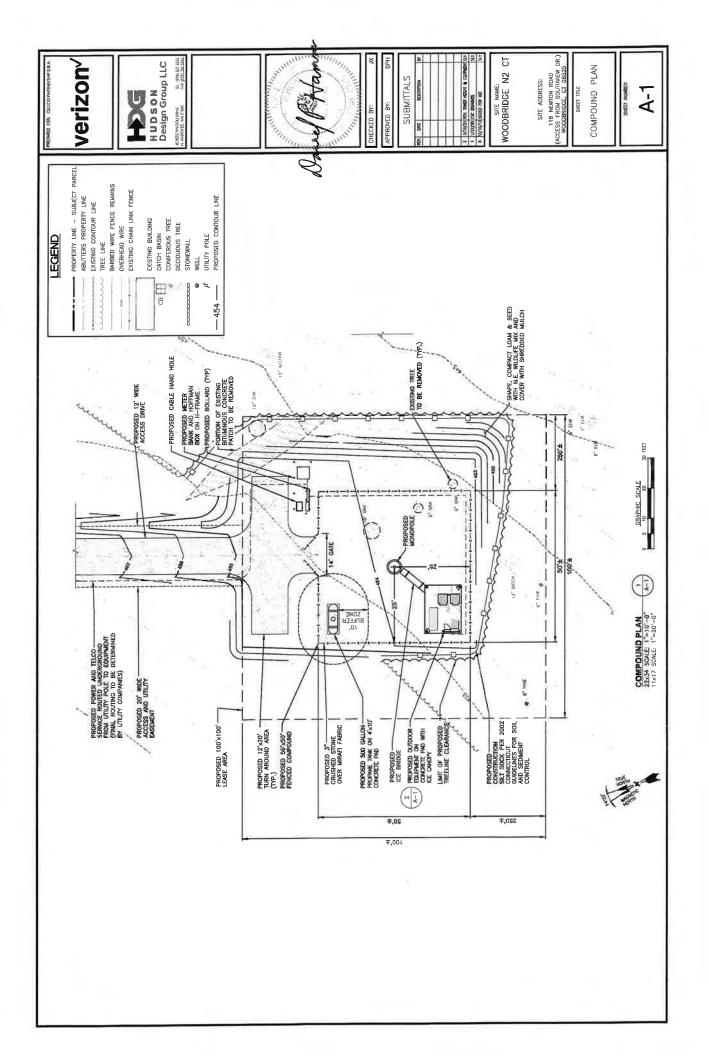
Kenneth C. Baldwin

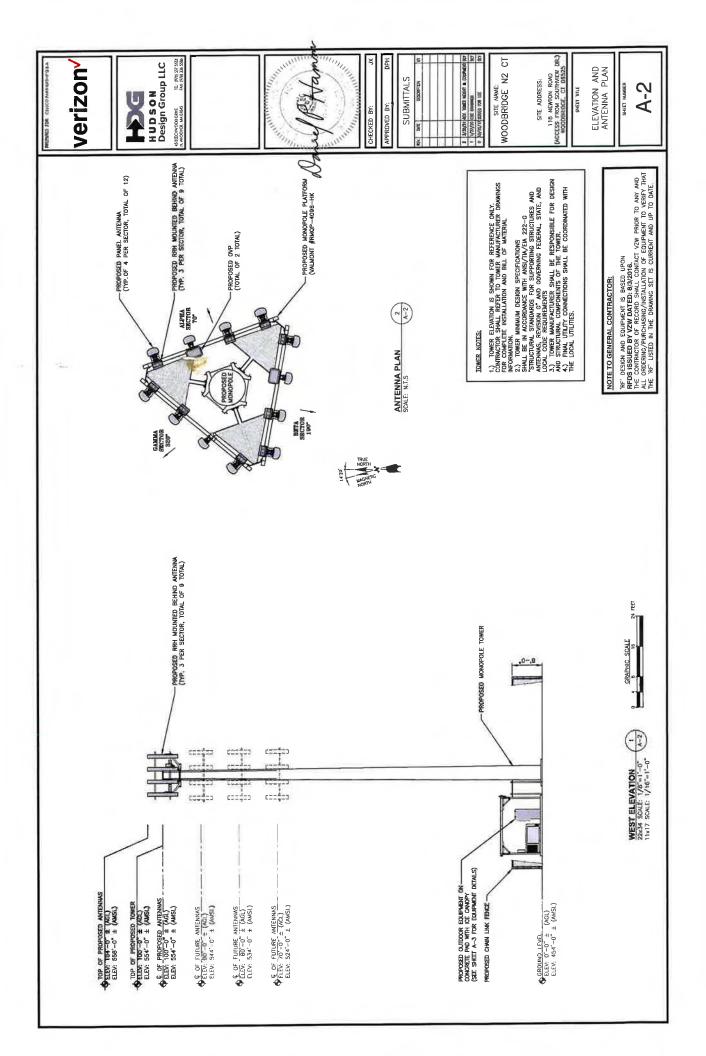
KCB/kmd Attachment

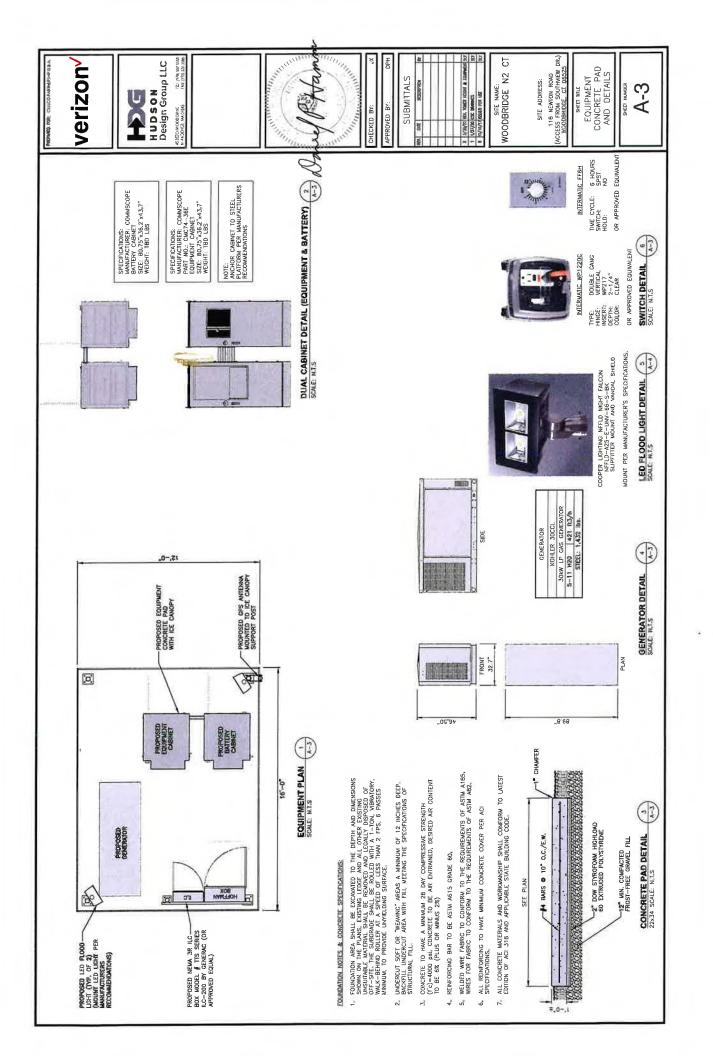


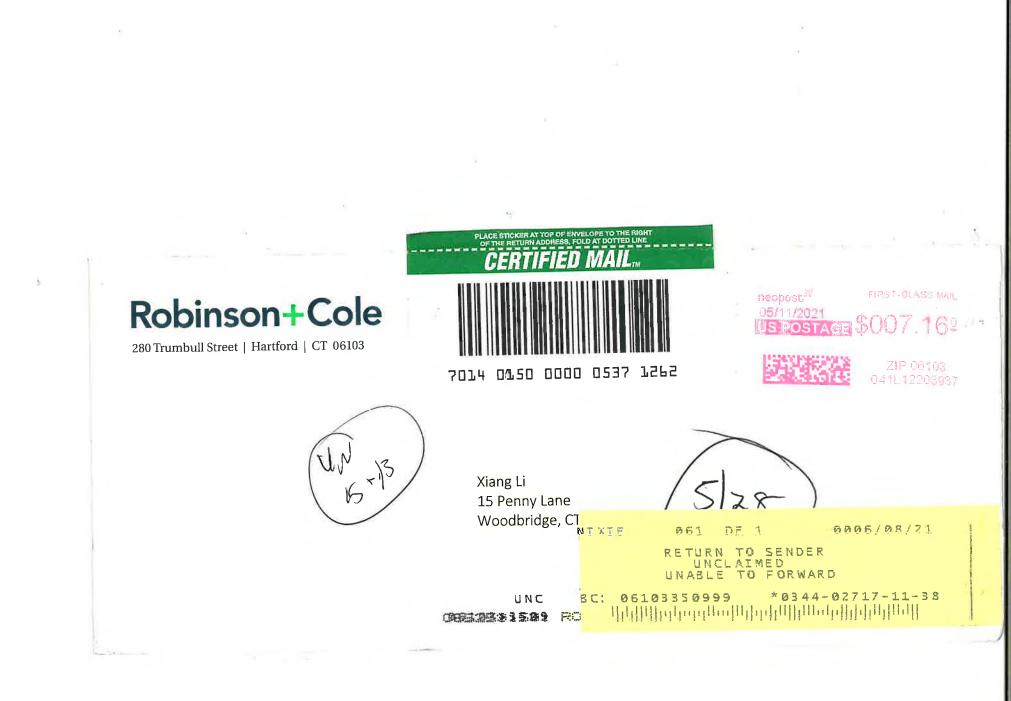












SENDER: COMPLETE THIS SE		COMPLETE THIS SECTION ON D	
 Complete items 1, 2, and 3. A item 4 if Restricted Delivery is Print your name and address of 	desired. on the reverse	A. Signature	Agent
 so that we can return the card Attach this card to the back of or on the front if space permit 	f the mailpiece,	B. Received by (Printed Name)	C. Date of Delivery
1. Article Addressed to:	A	D. Is delivery address different from If YES, enter delivery address b	
Xiang Li 15 Penny Lane Woodbridge, CT 06525			1.
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June 10, 2021

Elizabeth Crafts 110 Newton Road Woodbridge, CT 06525

Re: Cellco Partnership d/b/a Verizon Wireless - Proposed Telecommunications Facility Woodbridge, Connecticut

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Sincerely,

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Kenneth C. Baldwin

KCB/kmd Attachment

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Also admitted in Massachusetts and New York

May 11, 2021

Via Certified Mail, Return Receipt Requested

Elizabeth Crafts 110 Newton Road Woodbridge, CT 06525

Re: Cellco Partnership d/b/a Verizon Wireless – Proposed Telecommunications Facility at 118 Newton Road, Woodbridge, Connecticut

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State law provides that owners of record of property which abuts a parcel on which a facility is proposed to be located must receive notice of the submission of this application. This notice is directed to you either because you may be an abutting land owner or as a courtesy notice.

22291518-v1

Boston | Hartford | New York | Providence | Stamford | Albany | Los Angeles | Miami | New London | rc.com

May 11, 2021 Page 2

.

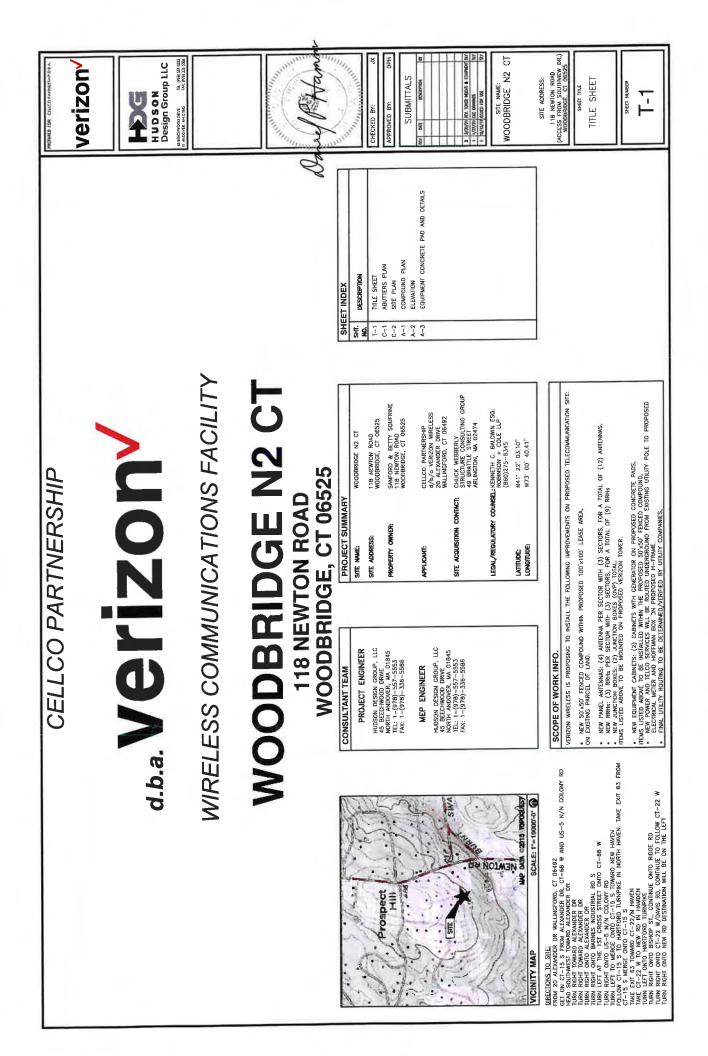
If you have any questions concerning the application, please direct them to either the Connecticut Siting Council or me. My address and telephone number are listed above. The Siting Council may be reached at its New Britain, Connecticut office at (860) 827-2935.

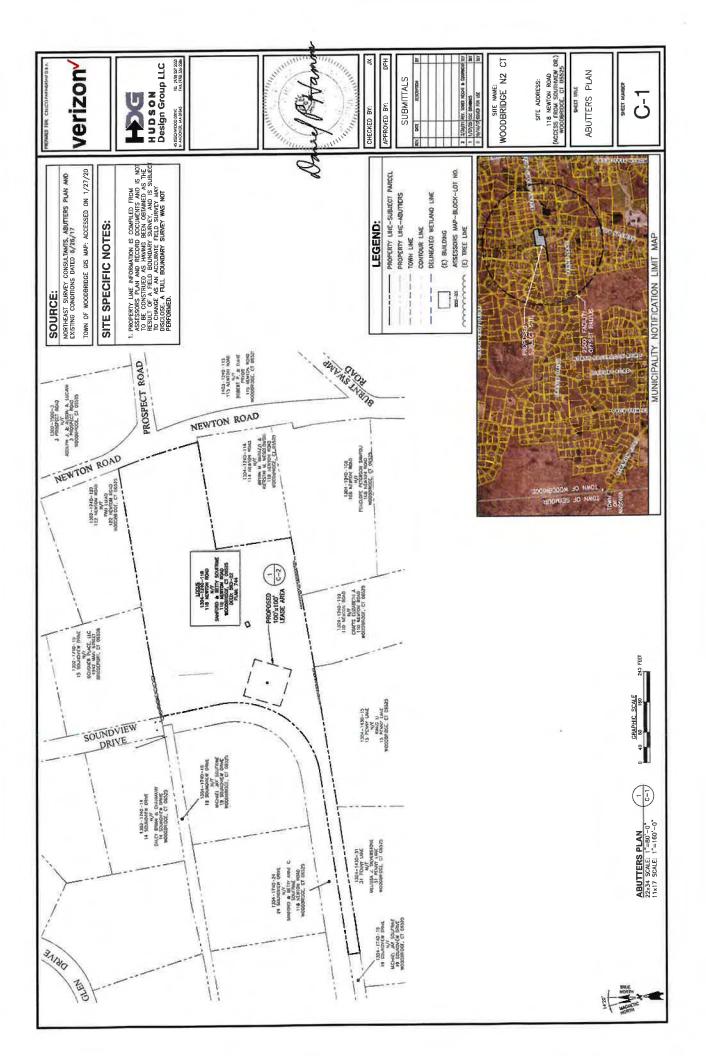
Very truly yours,

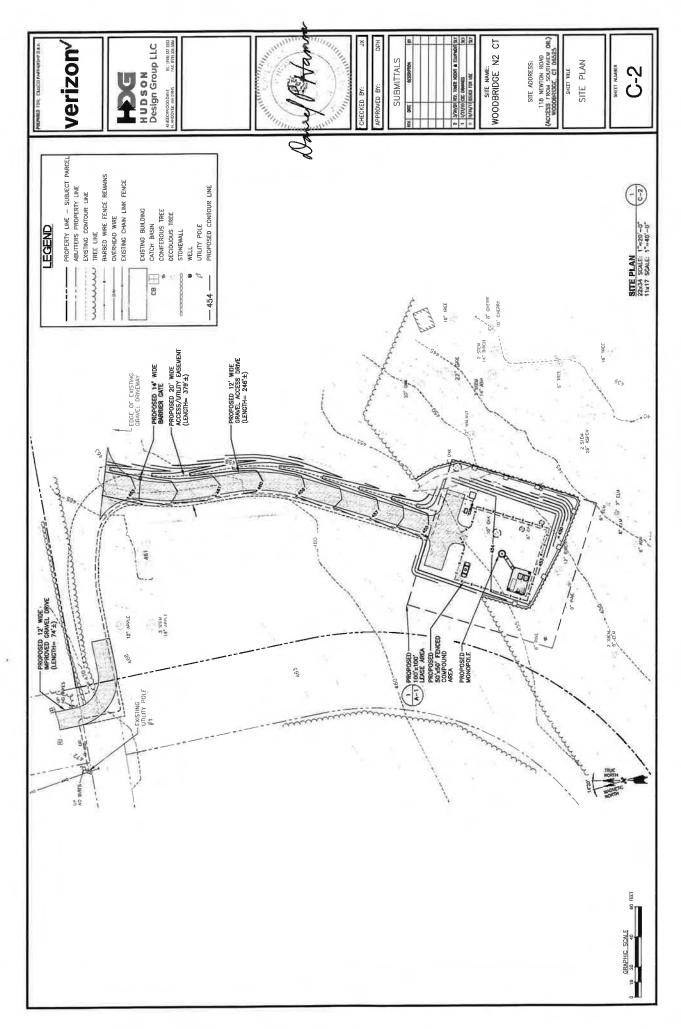
Kunie Mu

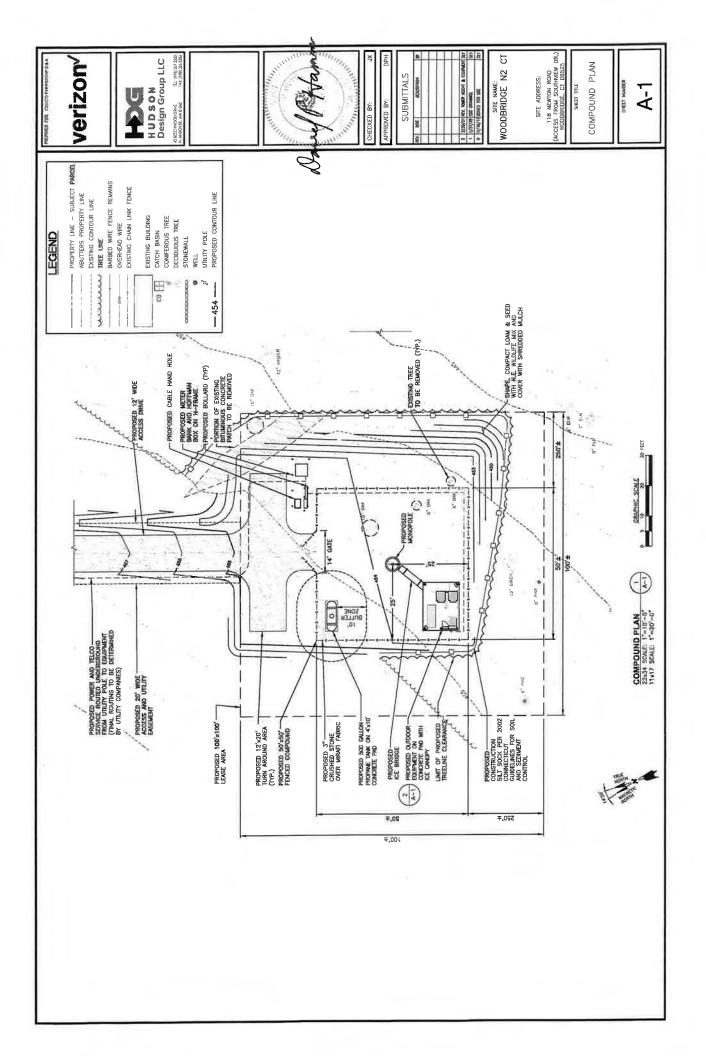
Kenneth C. Baldwin

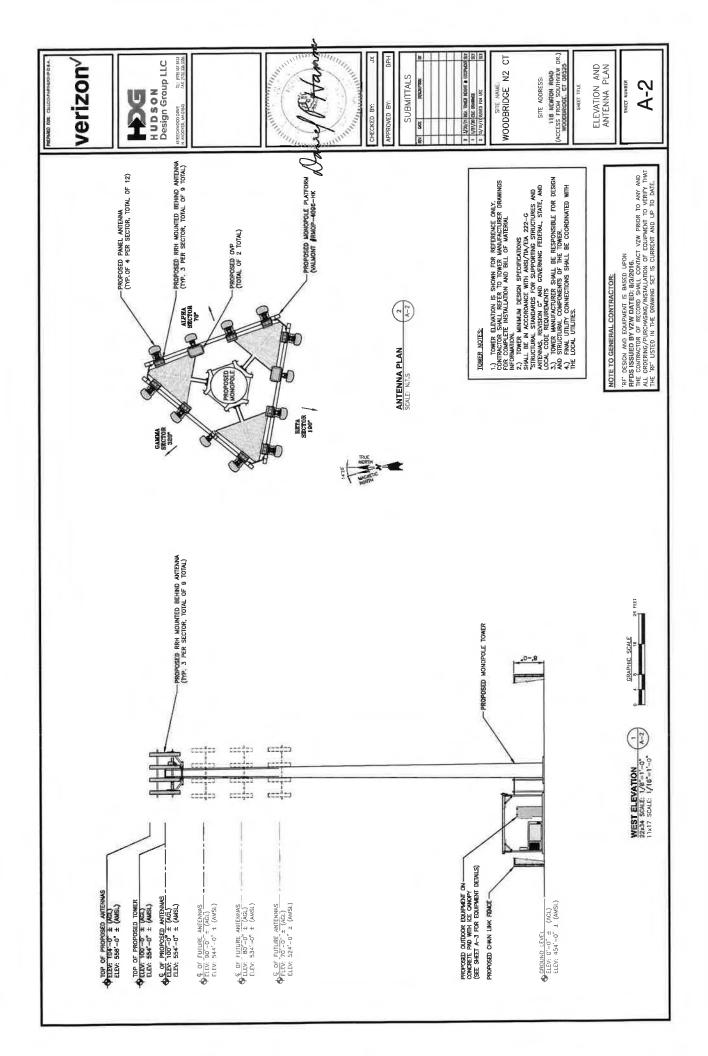
KCB/kmd Attachment

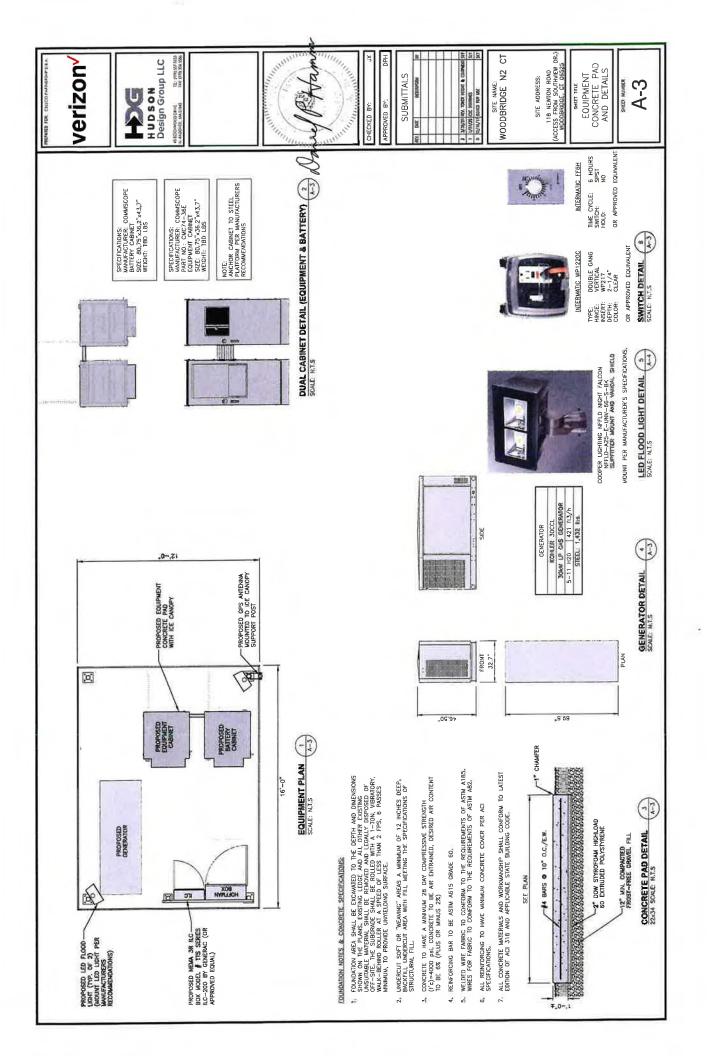














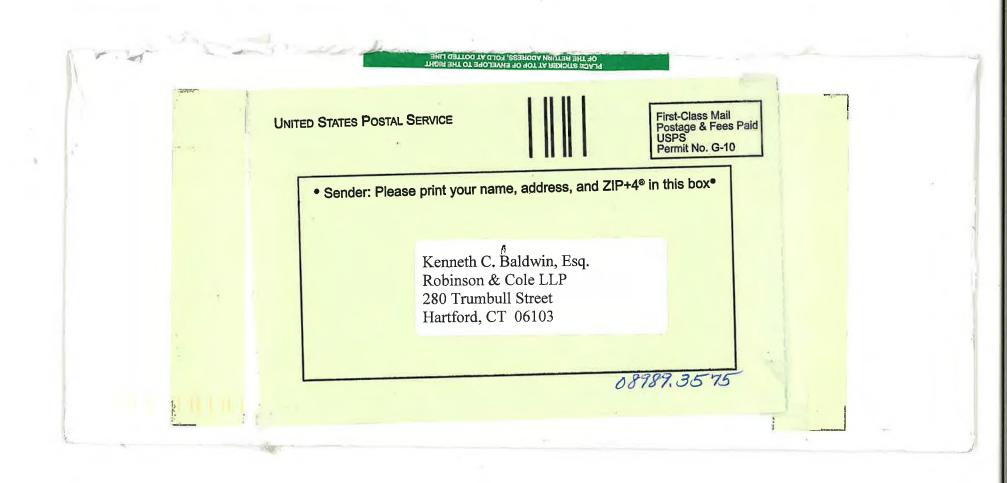


EXHIBIT 2

Eric Swanson Resume

Department of Physics and Astronomy University of Pittsburgh Pittsburgh, PA, 15260 (412) 624-9057 e-mail: swansone@pitt.edu swanson.scientific@gmail.com

Education:

Ph.D.	Physics	University of Toronto	1991
M.Sc.	Physics	University of Toronto	1985
B.Math.	Applied Mathematics	University of Waterloo	1984

Career:

Professor	2000 - present	University of Pittsburgh
Visiting Scholar	2005	Department of Theoretical Physics, Oxford University, UK
Visiting Scientist	1999	TRIUMF, Vancouver, Canada
Consultant	1999 - 2001	Los Alamos National Laboratory
Assistant Professor	1994 - 1999	North Carolina State University
Research Associate	1993 - 1994	Center for Theoretical Physics, MIT
Visiting Scientist	1993	Rutherford Appleton Lab, Didcot, UK
Postdoctoral Fellow	1991 - 1993	Center for Theoretical Physics, MIT

Highlights:

• named an American Physical Society Fellow in 2010.

• Author of Applied Computational Physics (Oxford University Press) and Science and Society (Springer).

- Research funded by the Department of Energy since 1996.
- Recipient of five graduate student awards; NSERC Postdoctoral Fellowship.

• Supervised eight postdoctoral researchers, four PhD students, MSc and undergraduate students.

• Author of six op-eds in the Pittsburgh Post Gazette and several popular science articles.

• Assessor for Department of Energy, National Science Foundation, national laboratories, and the national supercomputing centers.

• Founder and past chair of the American Physical Society Topical Group on Hadronic Physics.

• Twenty-five years teaching experience.

 $\bullet~75$ refereed publications; 62 conference proceedings; two books; approximately 50 interviews.

• Approximately 250 international talks and seminars given in 23 countries, 21 states, and 4 provinces.

• Approximately 150 scientific meetings attended in 17 countries.

Woodbridge, CT Oct 22, 2020

The Health Effects of Radiofrequency Radiation

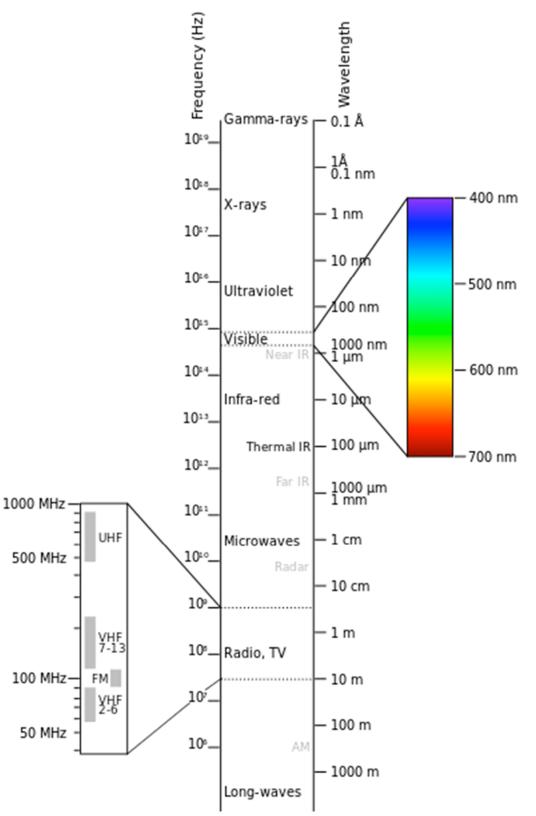
Eric Swanson

professor of physics at the University of Pittsburgh fellow of the American Physical Society

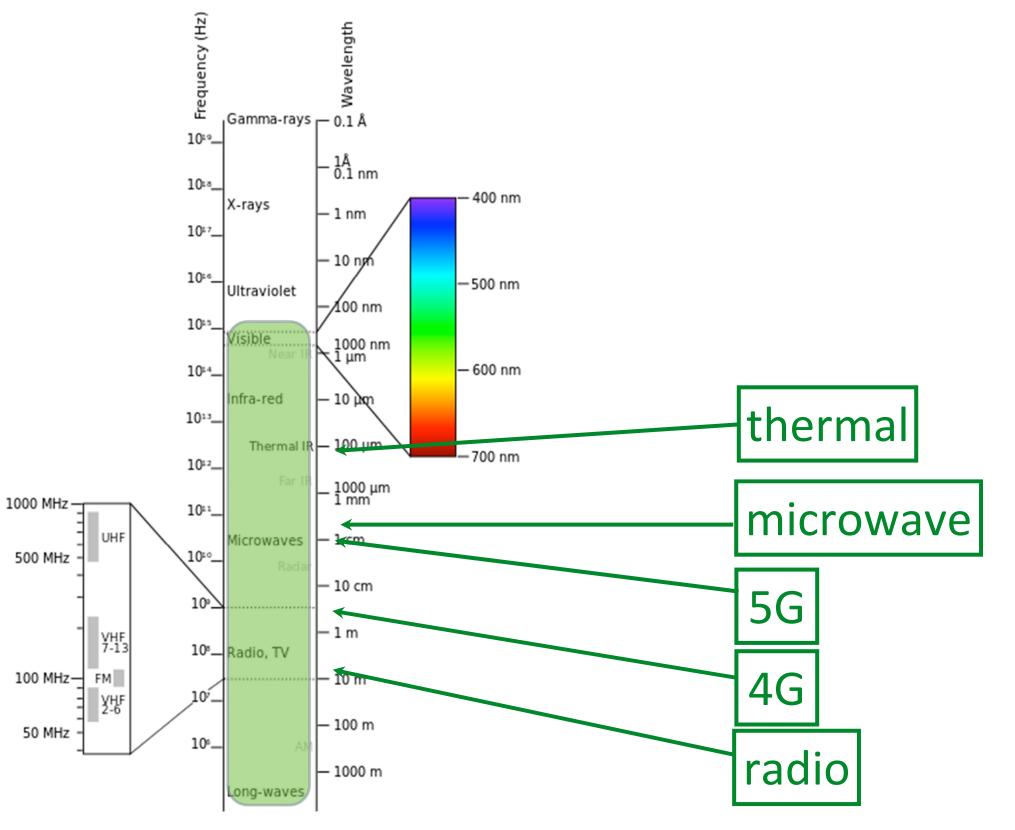
I will be presenting the consensus scientific view on RFR.



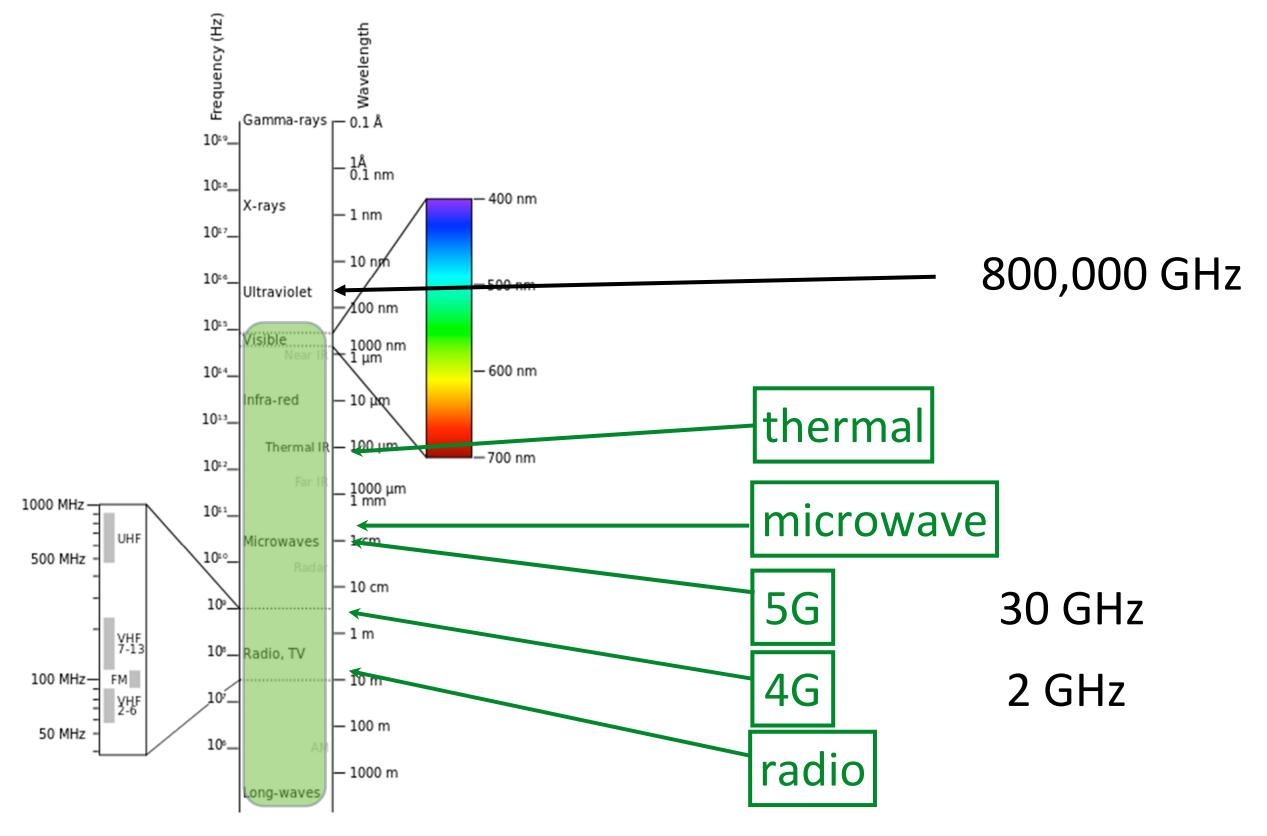
There is no verified evidence that non-ionizing EM radiation has any effect other than heating of tissue.



There is no verified evidence that non-ionizing EM radiation has any effect other than heating of tissue.



There is no verified evidence that non-ionizing EM radiation has any effect other than heating of tissue.





The FCC regulates RFR to limit thermal effects.

Limits are very strict, and are set at 1/50 the level of what is detectable in animal experiments.

For comparison, my heating pad produces about 50 times more heating than the FCC permits.



The FCC regularly updates its rules.





Review of Published Literature between 2008 and 2018 of Relevance to Radiofrequency Radiation and Cancer

February 2020

"[For 2008-2018] there have been approximately 125 articles that are most relevant for the study of any effects of RFR on animals. However, none have adequately demonstrated that localized exposure of RFR at levels that would be encountered by cell phone users can lead to adverse effects."

Typical Exposure due to a 4G tower

As a fraction of MPE

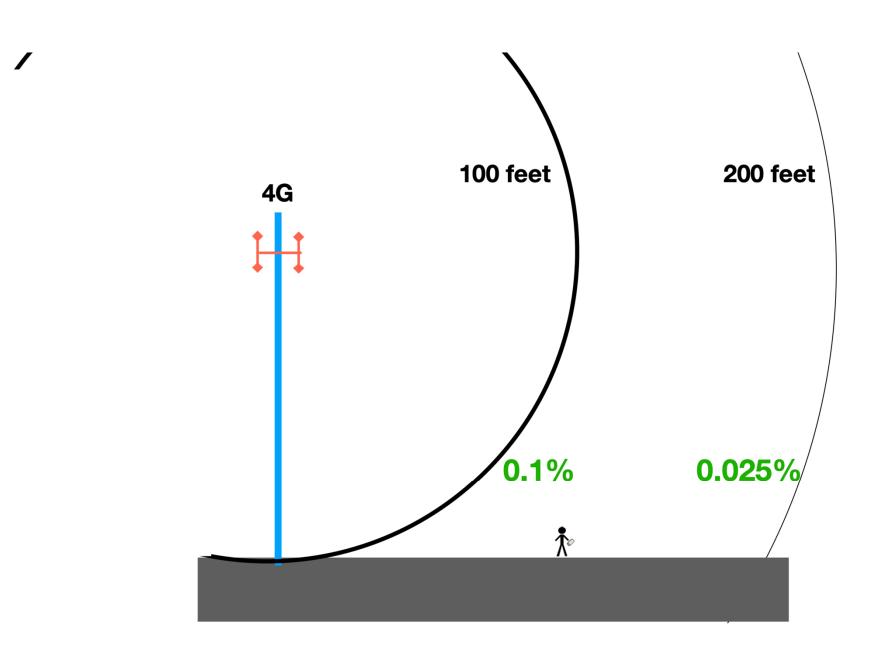
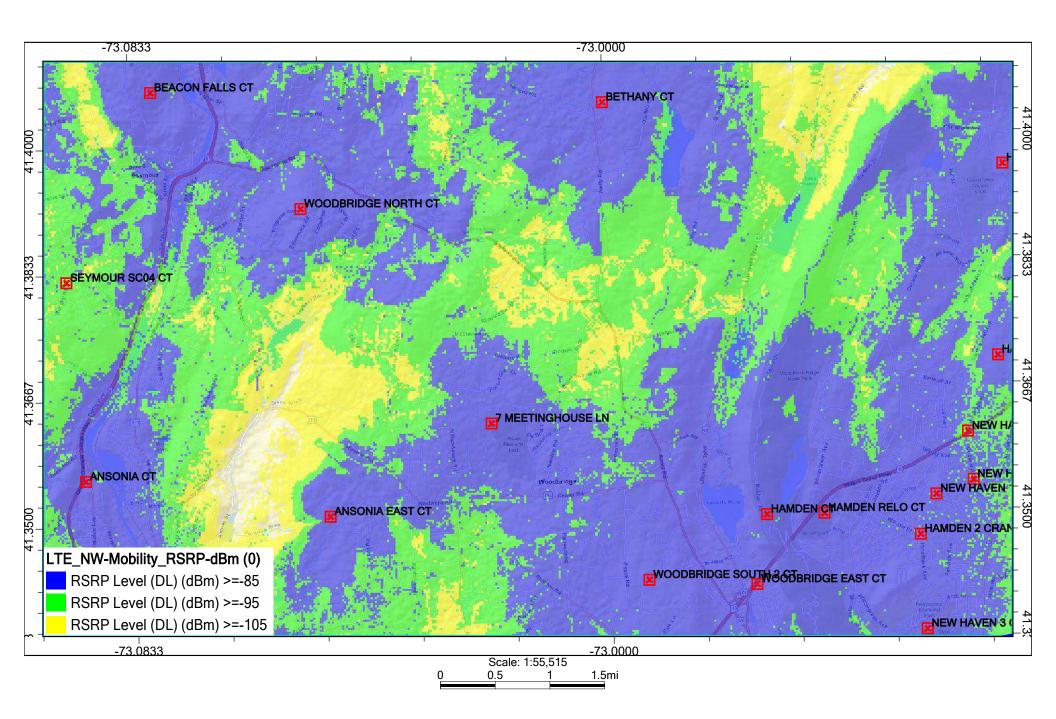
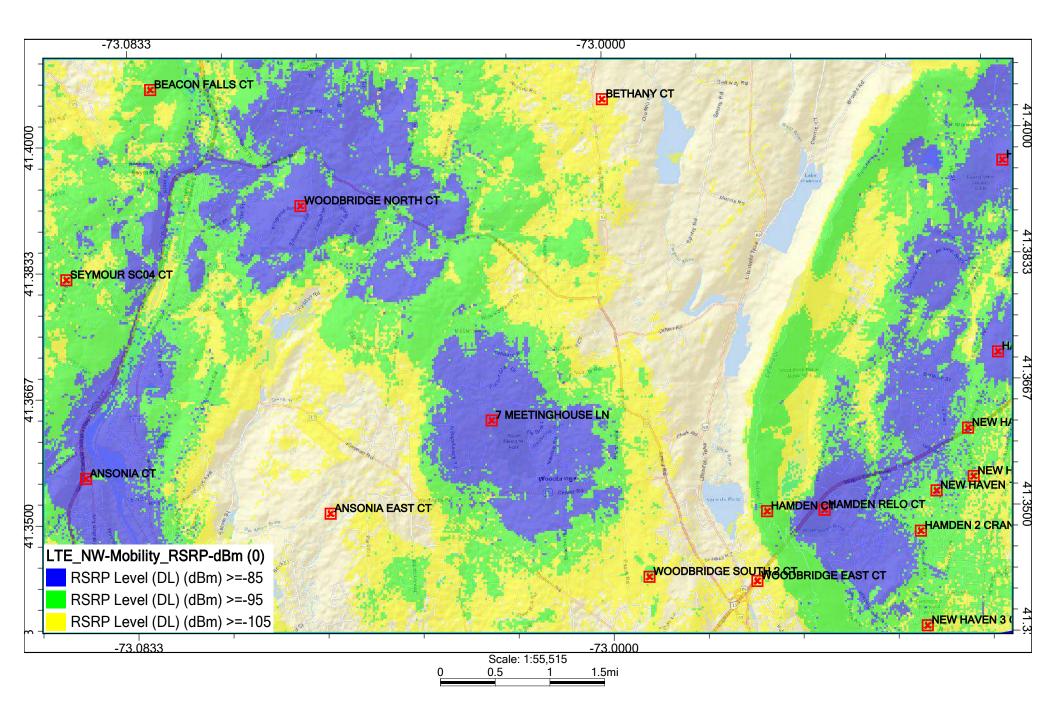
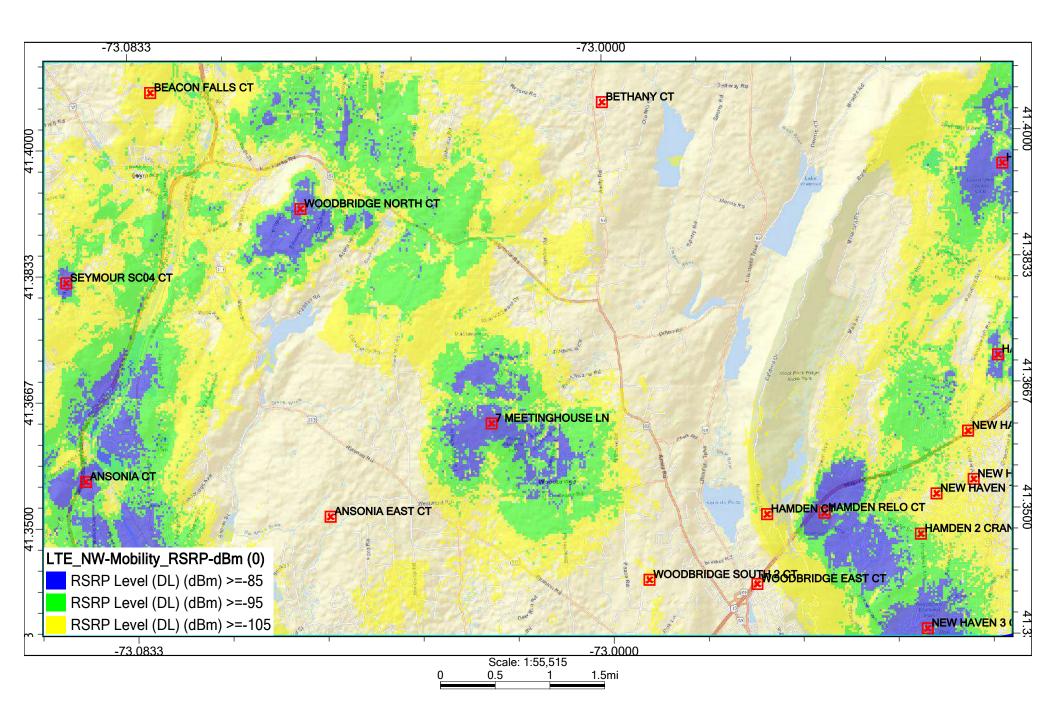


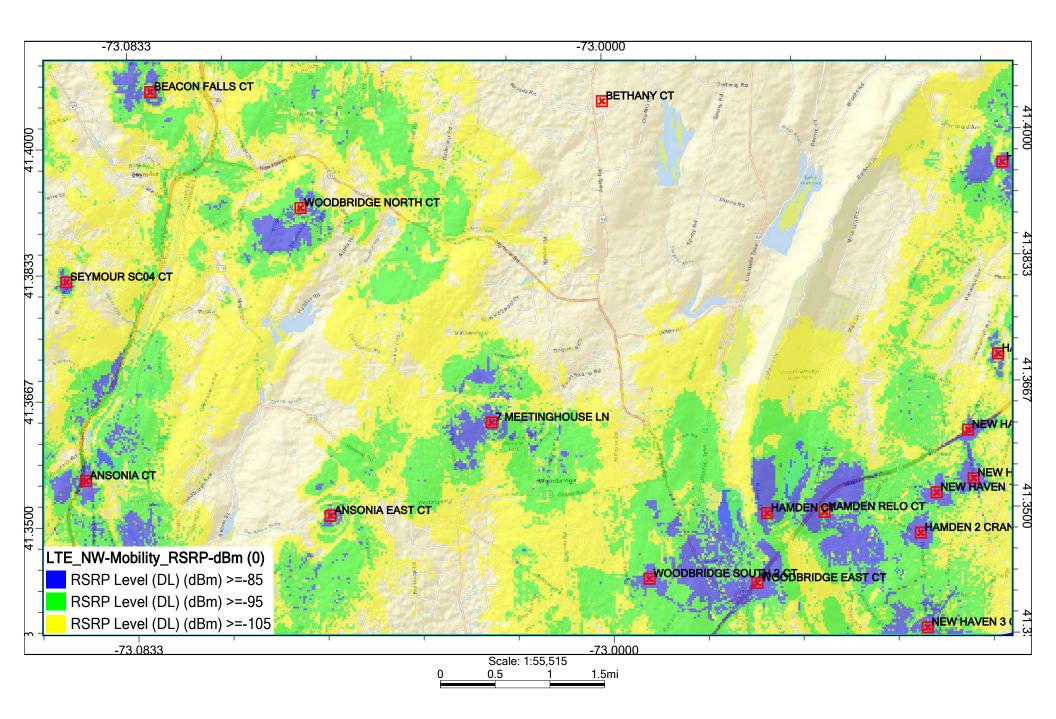
EXHIBIT 3 Meetinghouse Ln - 700MHz

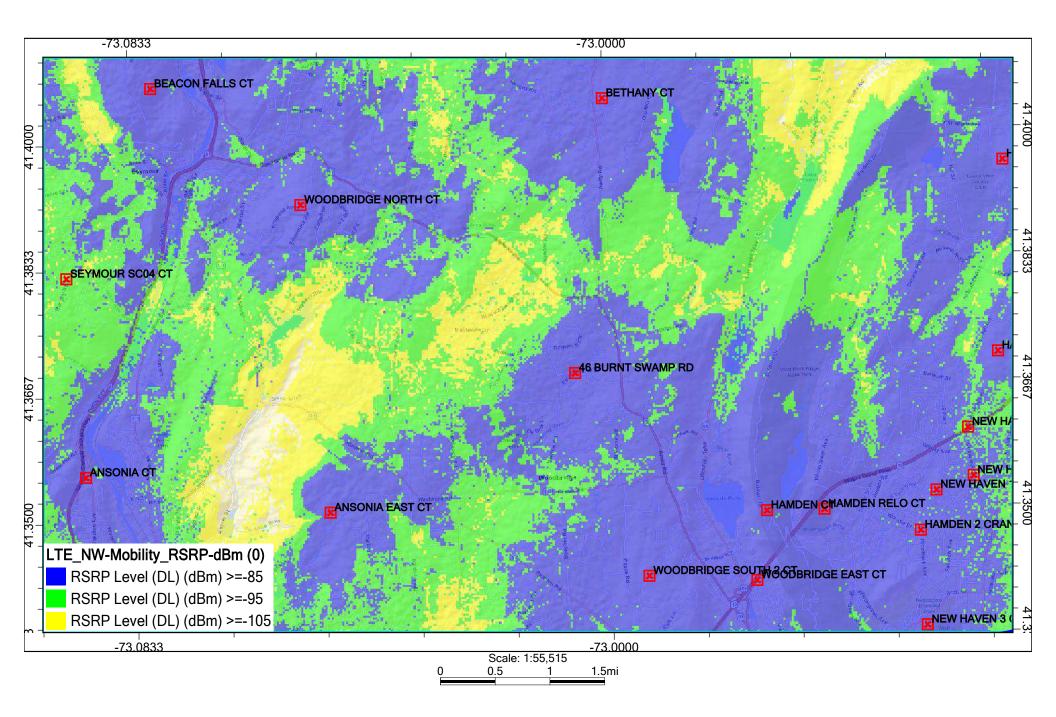


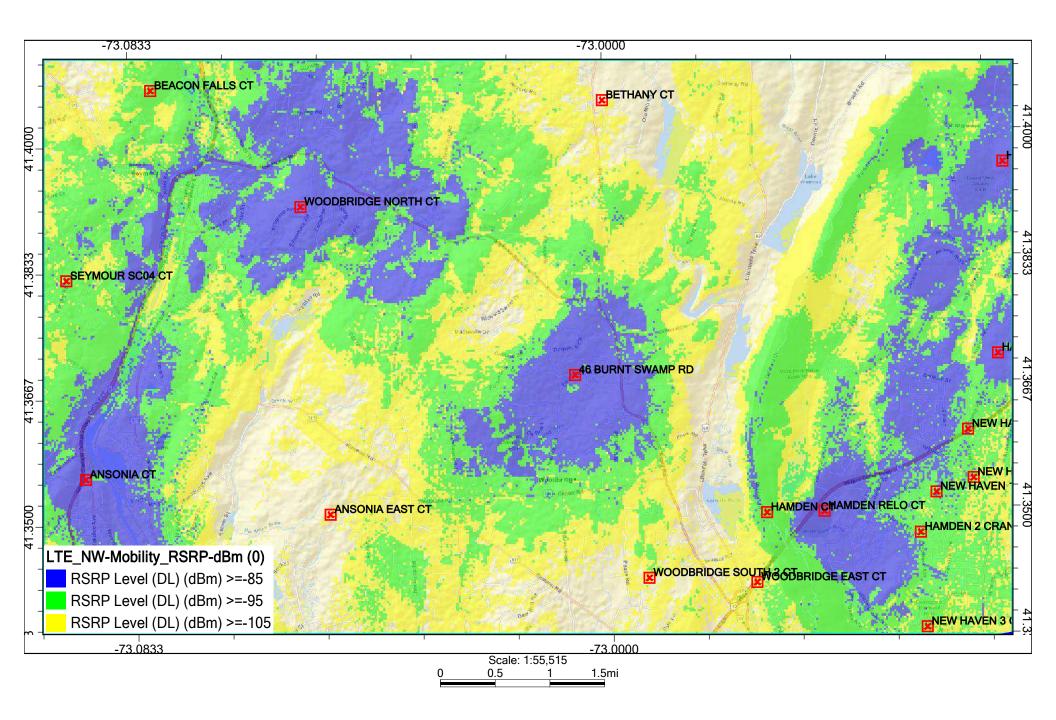


Meetinghouse Ln - 1900MHz

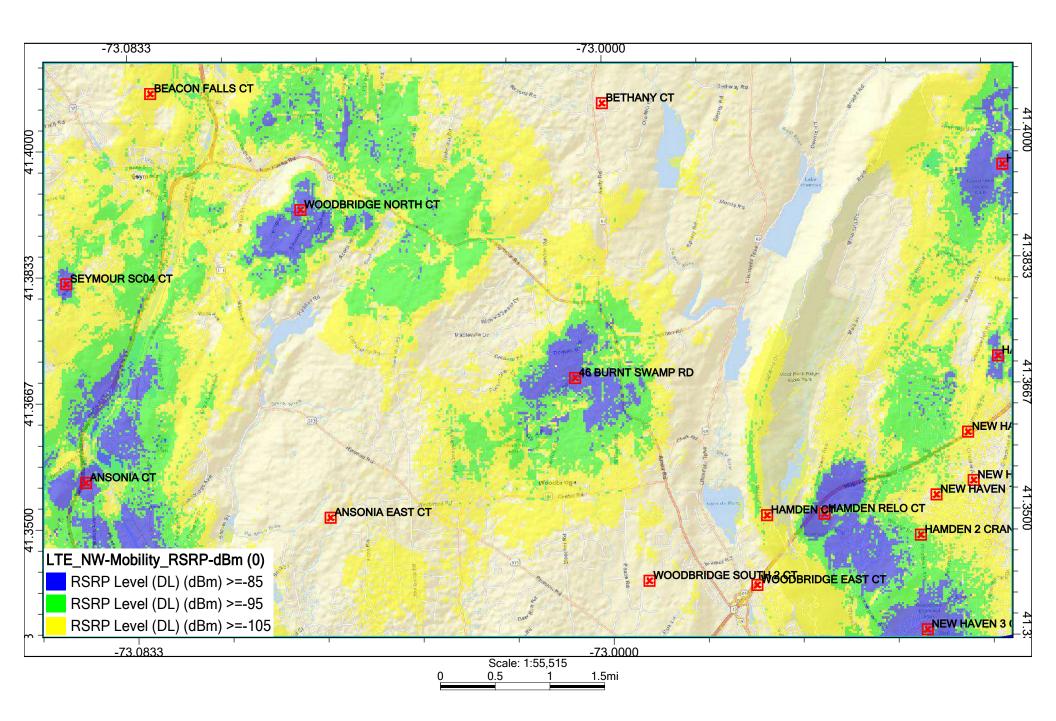




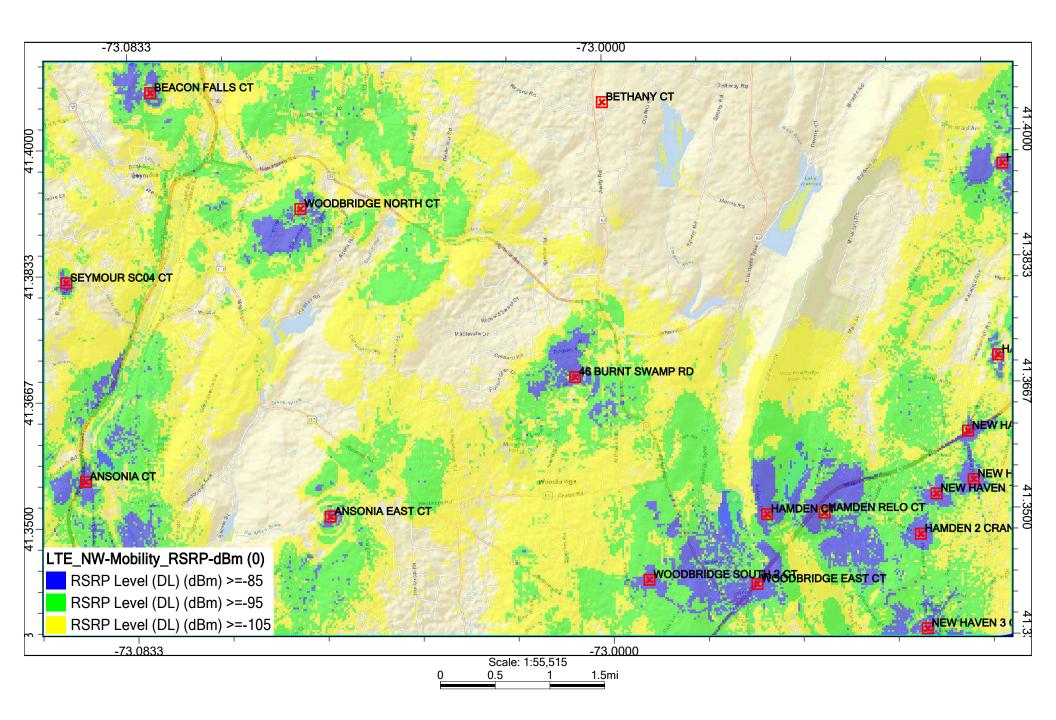




Burnt Swamp Rd - 1900MHz



Burnt Swamp Rd - 2100MHz



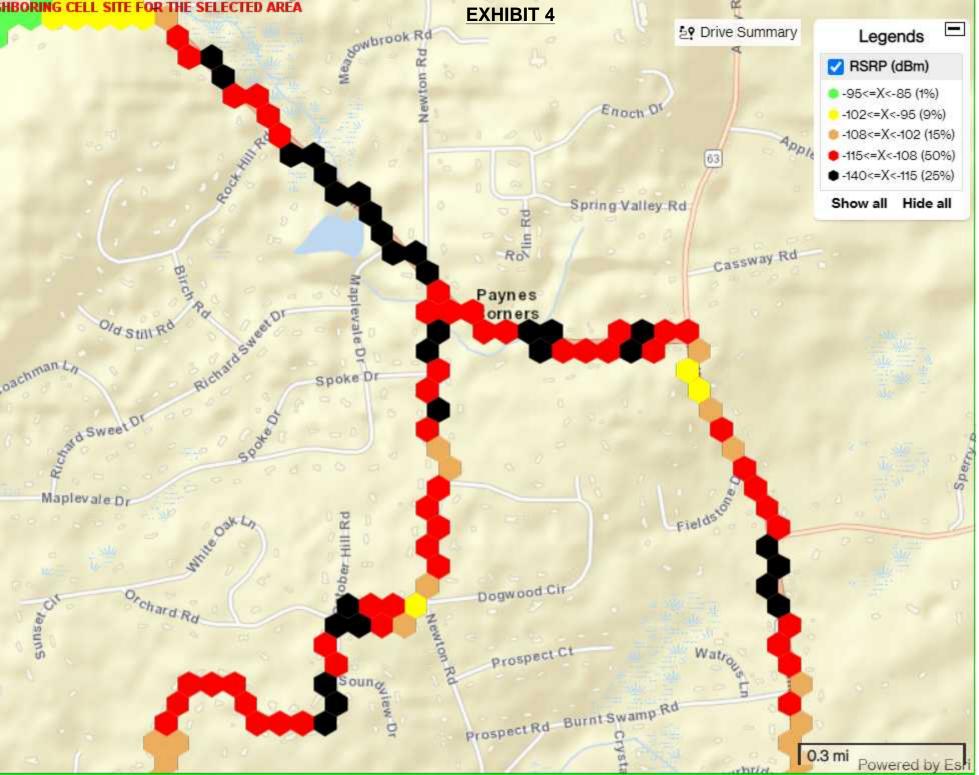


EXHIBIT 5

CSC Docket No. 502 - Interrogatory #34

Photo	Location	Orientation	Distance to Site	Visibility	Height of Tower Visible in Photograph
1	Soundview Drive	Southeast	± 378 Feet	Year Round	100'
2	Soundview Drive	Southeast	± 0.16 Mile	Seasonal	10'-20'
9	Prospect Court	Southwest	± 0.26 Mile	Seasonal	20'-30'
12	Newton Road	Southwest	± 0.14 Mile	Seasonal	20'-40'
14	Burnt Swamp Road	Southwest	± 0.16 Mile	Seasonal	20'-40'
15	Newton Road at Burnt Swamp Road	Southwest	± 0.14 Mile	Year Round	40'-60'
16	Newton Road	West	± 0.13 Mile	Year Round	10'-20'
17	Burnt Swamp Road at Newton Road	Northwest	± 0.15 Mile	Seasonal	1'-10'*
19	Hampton Drive	Northwest	± 0.20 Mile	Seasonal	1'-10'*
20	Newton Road	Northwest	± 0.22 Mile	Seasonal	1'-10'*
22	Penny Lane	Northwest	± 0.21 Mile	Seasonal	1'-10'*
23	Newton Road	Northwest	± 0.27 Mile	Seasonal	1'-10'*
* Tower is visible within the treeline					



EXHIBIT 6

REMOTE FIELD REVIEW



CT SITING COUNCIL DOCKET NO. 502 RESPONSE TO INTERROGATORY 37 WOODBRIDGE N2 CT 118 NEWTON ROAD WOODBRIDGE, CT 06525

> PREPARED FOR: VERIZON WIRELESS 20 Alexander Drive Wallingford, CT 06492

PREPARED BY:

ALL-POINTS TECHNOLOGY CORPORATION, P.C. 567 Vauxhall Street Extension – Suite 311 Waterford, CT 06385





РНОТО	DESCRIPTION
1	SOUNDVIEW DRIVE LOOKING SOUTH TOWARDS PROPOSED ACCESS DRIVE









DESCRIPTION VIEW FROM START OF PROPOSED ACCESS DRIVE - FOUR CARDINAL POINTS



2



PHOTO	DESCRIPTION
3	PROPOSED ACCESS DRIVE LOOKING EAST





3A	PROPOSED ACCESS DRIVE LOOKING WEST
рното	DESCRIPTION







4	PROPOSED ACCESS DRIVE LOOKING EAST
рното	DESCRIPTION









ошт

РНОТО **5**

DESCRIPTION
VIEW FROM PROPOSED ACCESS DRIVE - FOUR CARDINAL POINTS





DESCRIPTION
PROPOSED ACCESS DRIVE LOOKING SOUTH





рното	DESCRIPTION
7	PROPOSED ACCESS DRIVE LOOKING SOUTHWEST





DESCRIPTION

PROPOSED ACCESS DRIVE AT START OF LEASE AREA LOOKING SOUTHWEST





DESCRIPTION

VIEW FROM PROPOSED NORTHWEST FENCE CORNER LOOKING SOUTHEAST







РНОТО **10** DESCRIPTION
VIEW FROM PROPOSED TOWER - FOUR CARDINAL POINTS





DESCRIPTION

LOOKING SOUTHWEST



11



DESCRIPTION

LOOKING NORTHWEST







рното	DESCRIPTION
12A	LOOKING SOUTH TOWARDS ADJACENT PROPERTIES

