

**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 IN WOODBRIDGE,** :  
**CONNECTICUT** : **SEPTEMBER 17, 2021**

**OBJECTION TO WNNET’S MOTION FOR HEARING CONTINUATION OR TO  
DENY THE APPLICATION AS INCOMPLETE**

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby objects to Intervenor Woodbridge Newton Neighborhood Environmental Trust’s (“WNNET”) motion for hearing continuation or, in the alternative, to deny the Docket No. 502 application as incomplete (“Motion”) filed on September 16, 2021.

**Background**

Cellco filed the Docket No. 502 application with the Council on May 13, 2021. At its regular business meeting of June 3, 2021, the Council determined that the Docket No. 502 application met all statutory and technical requirements for processing and deemed it complete. The Council granted WNNET’s intervenor petition on June 17, 2021. WNNET has been an active participant in the docket since that time. Now, on the eve of the Council’s final evidentiary hearing in this docket, WNNET asks the Council to deny the Application, claiming it is incomplete or, in the alternative, continue the hearing to allow the State Historic Preservation Officer time to comment on an alternative tower location that the Applicant has already determined would not meet its wireless service objectives. For the following reasons, the Motion should be denied.

### The Motion is Untimely and Without Merit

As mentioned above, WNNET was granted intervenor status in Docket No. 502 on June 17, 2021. If WNNET believed that Cellco's application was incomplete, it should have raised this claim long ago, and not waited until the eve of the Council's final evidentiary hearing on this matter. More importantly, WNNET's claim that the Application is incomplete ignores the Council's June 3, 2021 determination that the Docket No. 502 application met all of the statutory and technical requirements for a Certificate application. (See Council Completeness Review Memorandum included in the Procedural Correspondence section of the Docket No. 502 web page).

### State Historic Preservation Office (SHPO) Review

Neither the Council's regulations nor its application guidance document for telecommunication facilities requires the submission of a final SHPO determination as a part of the Application. The Preliminary Historic Resources Determination included in the Application provides the Council with adequate information to make a determination that the proposed facility at 118 Newton Road will not have an adverse effect on historic properties, districts or resources in the area proximate to the proposed facility. Cellco is well aware of its obligations under the National Environmental Policy Act to submit the required documentation to the SHPO for its review prior to construction of a telecommunication facility approved by the Council and will do so at the appropriate time.

### WNNET Failed to Disclose the Location of the Woodbridge Green Historic District

WNNET has claimed that alternative tower sites should be considered at 4 Meetinghouse Lane and 15 Meetinghouse Lane. WNNET presented the Council with site information, mapping, coverage plots, drive data and site photographs in support of its position that these sites

were viable alternatives. What WNNET failed to disclose in any of its filings related to the alternative sites was that these alternative locations were within or adjacent to The Woodbridge Green Historic District, a National Register Historic District. This information is relevant to the Council's consideration of any tower site or alternative tower site presented for its review.<sup>1</sup>

For the reasons stated above, WNNET's Motion should be denied.

Respectfully submitted,

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS



By: \_\_\_\_\_

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<sup>1</sup> WNNET does mention in its response to Council Interrogatory 1(b) that the proximity of the Woodbridge Green Historic District (approximately one mile to the south) to the Soundview/Forest Glen neighborhood makes it an "extremely desirable area of Woodbridge in which to live". WNNET does not however, offer an opinion as to the impact a tower at one of the Meetinghouse Lane alternative locations may have on the neighborhoods surrounding those locations or on the adjacent historic district itself.

**CERTIFICATION OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of September 2021, a copy of the foregoing was sent,  
via electronic mail, to the following:

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