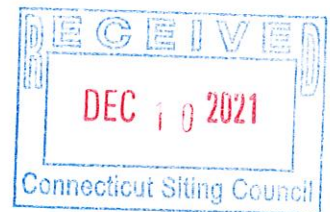


December 9, 2021

State of Connecticut
Connecticut Siting Council

Docket No. 502 – Cellco Partnership d/b/a Verizon Wireless Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance, and Operation of a Telecommunications Facility Located at 118 Newton Road, Woodbridge, CT

Intervenors Mark Greengarden and Michele Greengarden (each an “Intervenor” and together “Ochsner Place, LLC Party and CEPA Intervenors) Comments on Council’s Draft Findings of Fact



Submitted by:

Mark and Michele Greengarden
Ochsner Place, LLC
15 Soundview Drive
Woodbridge, CT

Item 41, p. 5: Cellco stated that they "...determined ...other potential sites in the Woodbridge area would not meet coverage objectives".

Inconsistency: Their determination was a result of propagation plots which are deemed inferior to drive tests. Therefore, alternative locations, such as 15 Meetinghouse Lane, were not properly evaluated and there are no accurate data supporting why the alternative sites "don't meet coverage objectives".

In "Continued Evidentiary Hearing Transcript, 10/19/21", p.71, Mr. Silvestri in conversation with Mr. Cheiban asks: "...I think we're all in agreement that the drive tests are more accurate than propagation plots. Would that be correct again, Mr. Cheiban?" And, Mr. Cheiban answers: "Yes, it is".

Item 64, p. 7: It states: "...in the northern section of Woodbury..."

Correction: It's Woodbridge

Item 81, p. 9: It states: "...northern Woodbury..."

Correction: Again, it's Woodbridge

Item 98, p. 14: It states: "The Meetinghouse Lane area is at the edge of the proposed service area and would not be able to effectively deploy three antenna sectors, and therefore would not be effective from a site *capacity* standpoint".

Inconsistency: Cellco made it clear in Item 75 that: "The proposed site is for *coverage* only" and they are not looking at capacity issues.

Item 99, p. 14: It states: "Cellco did not conduct a CW test from the Meetinghouse Lane area as it was at a significantly lower elevation than the proposed site."

Inconsistency: This is inconsistent with what Mr. Cheiban stated in his testimony from "Continued Evidentiary Hearing Transcript, 10/19/21, pp. 71-72, where he states that a drive test was not conducted because "...there's a couple of reasons. One was ...practical...in order to do the drive test we need to get permission from the Town. And...we did not have that much time. The other thing is cost...And so it was a combination of these two factors that...we did not do the CW test there."

Items 122 and 126 on p.16: Refers to a "monopole" and access to the site being from the Soundview Drive cul-de-sac.

Inconsistency and correction: In the "Applicant's Post-Hearing Brief, 11/18/21, "The Council ... asked Cellco to consider installing a tower disguised as a pine tree rather than a traditional monopole." "Cellco was [also] asked to consider constructing the permanent access drive to the Facility from Newton Road rather than Soundview Drive. Cellco was amenable to these proposed modifications as each would significantly help reduce the impact the Facility may have on adjacent property owners". These "plan modifications" were not mentioned in the Council's draft findings of fact and need to be included.

Item 127, p. 16: mentions that "...using the existing driveway that extends west from [118] Newton Road... passes between "two residences" on the parcel".

Correction: This is not correct. There are not two residences there. In fact, the town's property card confirms this.

Item 133, p. 17: It states that "the nearest residence is approximately 360 feet to the southwest at 15 Penny Lane".

Correction: This is incorrect. The nearest residence is 15 Soundview Drive which would be approximately 225 feet from the compound.

Item 183, p.21: It states *Soundview Lane*

Correction: It's *Soundview Drive*

p. 28, Figure 6 has an inaccurate labelling of the proposed site. Number 1 is the house at 118 Newton Road.

Correction: The "proposed site" is actually in the area next to number 3 on the map.

p. 34, Figure 12: "Proposed Site Visibility Analysis", and

p. 35, "Locations of photos with tower visibility" and "Visibility of Tower Within 0.5 miles",

Correction: These are inapplicable documents and are irrelevant based on the fact that the Council voted on the alternate location on the host property which is not shown on either of these maps and chart. A scenic impact on the alternate location was not done nor was a visibility study conducted on the alternate location.

CERTIFICATION

This is to certify that, on the 9th day of December, 2021, a copy of the foregoing was sent, electronically, and via first class United States mail, postage prepaid, to the following counsel of record:

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