



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

June 22, 2021

Keith R. Ainsworth, Esq.
Law Offices of Keith R. Ainsworth, Esq.
51 Elm Street, Suite 201
New Haven, CT 06510-2049

RE: **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, Connecticut.

Dear Attorney Ainsworth:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 6, 2021.

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 July 6, 2021 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,

s/Melanie Bachman

Melanie Bachman
Executive Director

c: Service List dated June 17, 2021

Docket No. 502
Pre-Hearing Interrogatories to WNNET

June 22, 2021

1. Referring to Page 2 of the Planned Woodbridge Newton Neighborhood Environmental Trust (WNNET) Application to Intervene dated June 8, 2021, provide the following:
 - a) Provide the names of the members of WNNET.
 - b) What “scenic vistas” would be negatively impacted by the proposed facility? What resource was used to determine scenic vistas would be impacted? What entity determined such vistas are scenic?
 - c) What alternative locations are available to the Applicant that will provide comparable wireless telecommunication services in this area and lessens the visual impact of the proposed facility? What coverage analysis/visual impact studies were performed to support this statement?
 - d) What natural resources would be negatively impacted by the proposed facility? What studies were performed to support this statement?
 - e) Describe the best available technology that can be used to reduce the visual impact of the proposed facility.