

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

February 18, 2022

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 kbaldwin@rc.com

RE **DOCKET NO. 507** – Homeland Towers, LLC and 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 wireless telecommunications facility located at 222 Clintonville Road, North Branford, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 4, 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 March 4, 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

c: Service List dated January 31, 2022

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Docket No. 507 Pre-Hearing Interrogatories Set One

General

- 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?
- 2. Referencing Application p. 20, how is the construction cost of the facility recovered for both Homeland and Cellco?
- 3. Referencing Application p.19, how many Town officials/area residents attended the October 28, 2021 public information meeting? What concerns were raised by residents and town officials and how were these concerns addressed?

Site Search

- 4. When did Homeland begin searching for a tower site in the Northford area?
- 5. When did Cellco issue the Site Acquisition Request Form (SARF) for the facility? Provide a copy of the SARF.
- 6. Referencing Application Attachment 8, provide propagation modeling for Site 29 and Site 30. What antenna height was modeled at each location?
- 7. Are small cells a feasible alternative to a new tower? Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

Site/tower

- 8. Would any blasting be required to develop the site?
- 9. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
- 10. Pursuant to CGS §16-50p(a)(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.
- 11. Does the cost estimate on Application p. 20 include a monopine design? What extra cost is attributed to the monopine?
- 12. What is the land use of the abutting property at 246 Clintonville Road?

Coverage/Capacity

- 13. Application Attachment 6 indicates other frequencies will be installed in addition to the 700 MHz frequency. Does the 700 MHz frequency act as the "base frequency" of the network where most of the wireless traffic occurs? How do the other frequencies interact in Cellco's wireless system?
- 14. Would the proposed antennas be capable of offering 5G services?
- 15. Can coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the service area.
- 16. Can flush-mounted antennas be installed at the site to provide the required coverage? Describe any antenna/tower modifications that would be required to achieve coverage objectives.
- 17. Were any studies conducted on the Town's wireless service requirements? Is it necessary to install the municipal antennas at the top of the tower?
- 18. Referencing Application p. 10, provide the distance to the listed adjacent Cellco sites. Provide the facility type and antenna centerline heights at these existing facilities.

Backup Power

- 19. What would be the run time for Cellco's proposed generator before it would need to be refueled, assuming it is running at full load under normal conditions?
- 20. If the backup generator failed to start, how long can the emergency battery provide power to Cellco's equipment?
- 21. Would the Town have a backup power source for its equipment? If yes, provide detail.
- 22. Is it possible for Cellco and the Town to share a backup power source at the site?

Public Safety

- 23. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
- 24. Referencing Application Attachment 13, revise the table to include the Town's antennas.
- 25. Is the proposed facility located within a Department of Energy and Environmental Protection designated Aquifer Protection Area?
- 26. Besides the backup power source, what other facility equipment generates noise? Would the noise from this equipment comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?

Environment

- 27. Referencing Application Attachment 11, does the on-site pond have the ability to function as a vernal pool?
- 28. Would any mapped areas of prime farmland soil be impacted by the project? If yes, estimate the amount of disturbance.
- 29. Referencing Attachment 8, Visual Resource Assessment,
 - a. would the shift of the tower location 45 feet to the south affect the areas of visibility shown on the viewshed map that was prepared for the initial site?
 - b. what would be the expected visibility of the proposed tower from the open areas of the properties to the south and southeast of the site?
 - c. the estimates of visibility on p. 9- *Viewshed Analysis Summary* do not match the estimates provided on p. 10 *Conclusion*. Clarify.
 - d. estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed facility.
 - e. Where is the nearest publicly accessible recreational area from the proposed tower? Identify the recreation area and describe the visibility from this area.
- 30. Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies 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:

- a. wetlands, watercourses and vernal pools;
- b. forest/forest edge areas;
- c. agricultural soil areas;
- d. sloping terrain;
- e. proposed stormwater control features;
- f. nearest residences;
- g. Site access and interior access road(s);
- h. tower location/compound;
- i. clearing limits/property lines;
- j. mitigation areas; and
- k. 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.