

KENNETH C. BALDWIN

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Also admitted in Massachusetts
and New York

June 21, 2023

Via Hand Delivery

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 515 – Application of Cellco Partnership 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 180 School Road in Wilton, Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's directive, enclosed please find the Applicant's Prehearing Submission identifying its witnesses and exhibits filed in advance of the June 29, 2023 evidentiary and public hearing sessions in Docket No. 515.

The attached exhibit list includes an updated USFWS & NDDB Compliance memo dated June 20, 2023 with specific reference to the recent up-listing of the Northern Long-eared Bat from a "threatened" species to an "endangered" species. Fifteen (15) copies of the updated USFWS & NDDB Compliance memo are attached.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Kenneth C. Baldwin

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 515
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 :
180 SCHOOL ROAD, WILTON, :
CONNECTICUT : JUNE 21, 2023

PRE-HEARING SUBMISSION OF
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (“Cellco”), the Applicant in this proceeding, hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Timothy Parks - Real Estate/Regulatory Specialist, Verizon Wireless
2. Shiva Gadasu, Radio Frequency Engineer, Verizon Wireless
3. David Weinpahl, P.E. on Air Engineering, LLC
4. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.
5. Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.

B. Exhibits to be offered

Cellco intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated March 17, 2023.
2. Bulk file exhibits including:
 - a. Town of Wilton Zoning Regulations;
 - b. Town of Wilton Inland Wetlands and Watercourses Regulations; and
 - c. Town of Wilton Plan of Conservation & Development.
3. Cellco's Affidavit of Publication dated March 20, 2023.
4. Cellco's Responses to Pre-Hearing Interrogatories (Set One) from the Council dated May 18, 2023.
5. Sign Posting Affidavit filed on June 19, 2023.
6. Updated USFWS & NDDB Compliance memo dated June 20, 2023.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

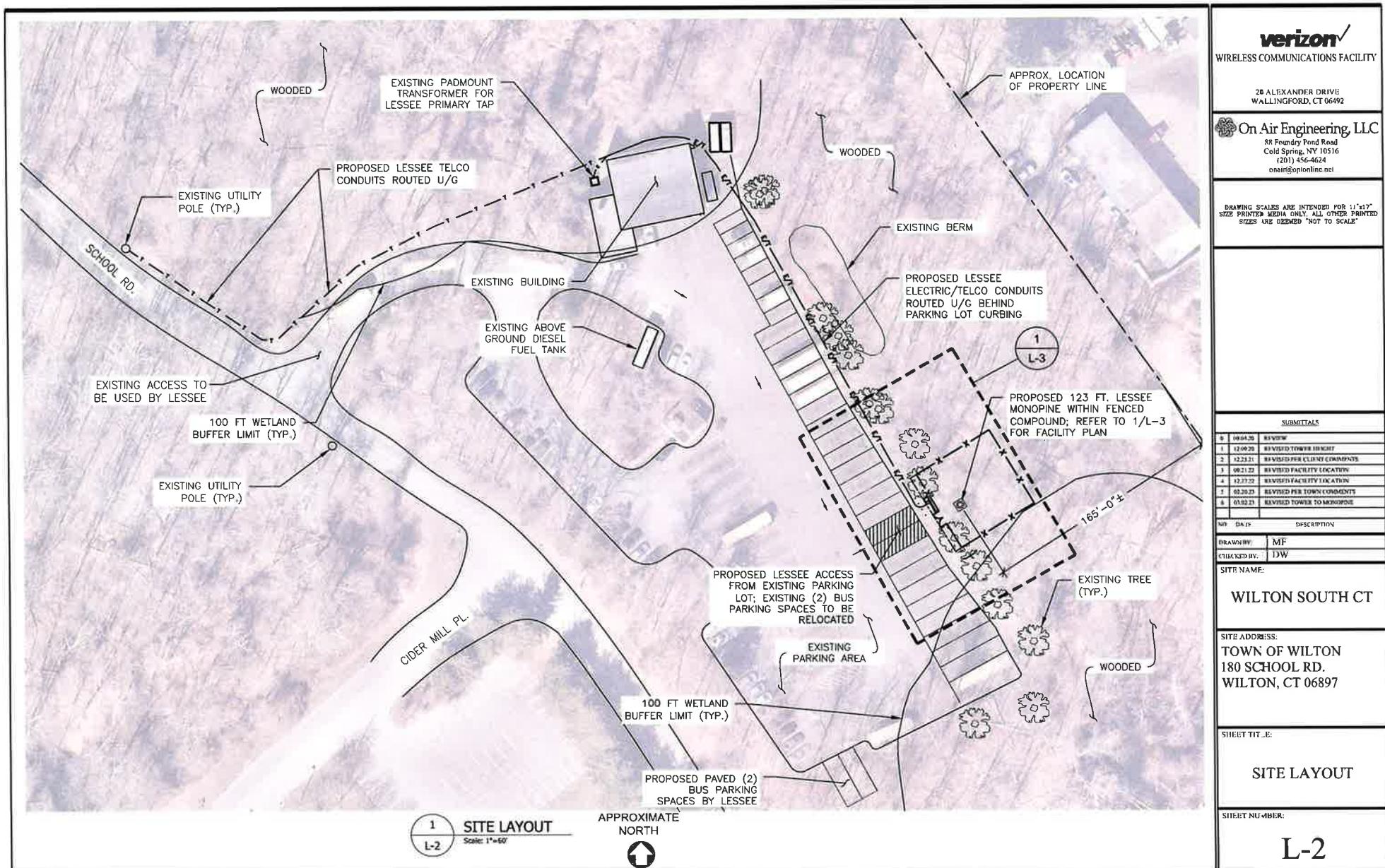
Prior to the start of the Remote Public Comment Session, the Applicant's attorney, Kenneth C. Baldwin, Esq., will make a brief presentation describing the site features and proposed site improvements. Attorney Baldwin will refer to the Site Layout (Sheet L-2), Compound Plan (Sheet L-3) and West Elevation (Sheet L-4), each included in Exhibit 1 of Cellco's responses to Council Pre-hearing Interrogatories (Set 1). Electronic copies of Sheets L-2, L-3 and L-4 are attached to this filing.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys



verizon

WIRELESS COMMUNICATIONS FACILITY

20 ALEXANDER DRIVE
WALLINGFORD, CT 06492

On Air Engineering, LLC
RR Foundry Pond Road
Cold Spring, NY 10516
(201) 456-4624
onair@optonline.net

DRAWING SCALES ARE INTENDED FOR 11" x 17"
SIZED PRINTED MEDIA ONLY. ALL OTHER PRINTED
SIZES ARE DEEMED "NOT TO SCALE".

SUMMITALS

0	10/04/20	REVIEW
1	12/08/20	REVISED TOWER HEIGHT
2	12/23/21	REVISED PERMIT COMMENTS
3	08/31/22	REVISED TOWER ELEVATION
4	12/23/22	REVISED TOWER ELEVATION
5	02/28/23	REVISED PERMIT COMMENTS
6	03/02/23	REVISED TOWER TO MONOPINE

NO DATE DESCRIPTION

DRAWN BY: MF
CHECKED BY: DW

SITE NAME:

WILTON SOUTH CT

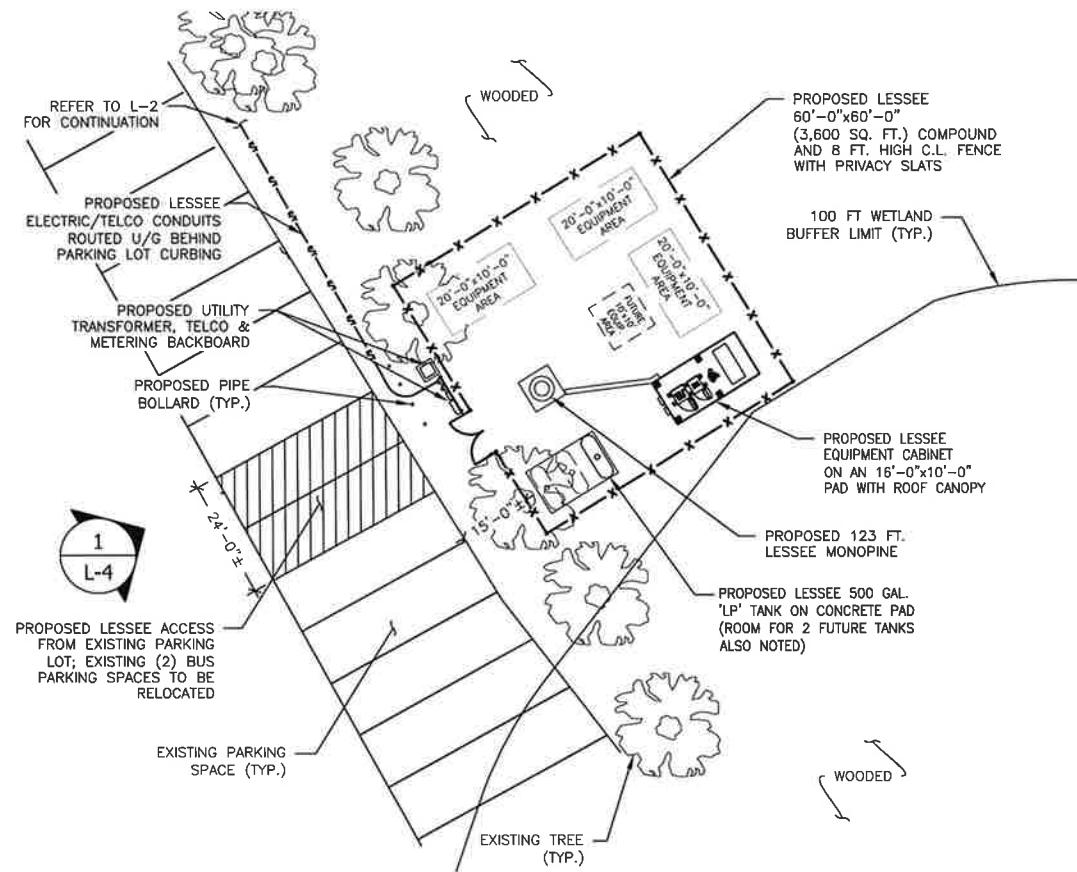
SITE ADDRESS:
TOWN OF WILTON
180 SCHOOL RD.
WILTON, CT 06897

SHEET TITLE:

COMPOUND PLAN

SHEET NUMBER:

L-3



1
L-3
COMPOUND PLAN
Scale: 1"=20'

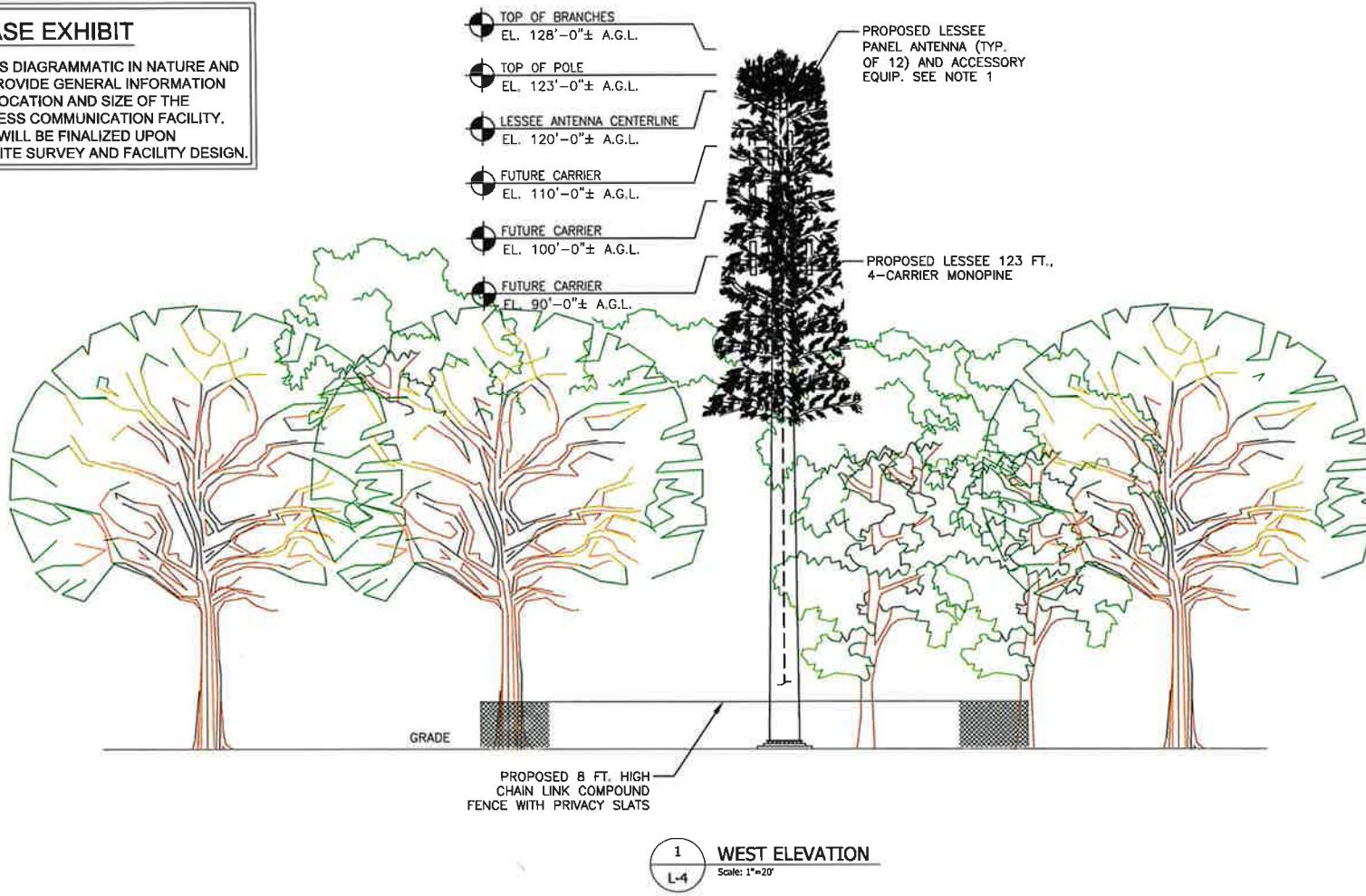
APPROXIMATE
NORTH

NOTES:

1. THE PROPOSED LESSEE ANTENNA INSTALLATION TO CONSIST OF (3) SECTORS OF (4) PANEL ANTENNAS EACH FOR UP TO (12) PANEL ANTENNAS TOTAL AND ASSOCIATED APPURTENANCES; SUBJECT TO CHANGE AT ANY TIME.
2. DESIGN SHOWN IS PRELIMINARY AND SUBJECT TO ENVIRONMENTAL, JURISDICTIONAL, GEOTECHNICAL AND OTHER EVALUATIONS, AS REQUIRED.
3. BRANCH DESIGN IS CONCEPTUAL AND SUBJECT TO CHANGE BASED ON ZONING, MANUFACTURER AND/OR OTHER REQUIREMENTS.

LEASE EXHIBIT

THIS LEASE PLAN IS DIAGRAMMATIC IN NATURE AND IS INTENDED TO PROVIDE GENERAL INFORMATION REGARDING THE LOCATION AND SIZE OF THE PROPOSED WIRELESS COMMUNICATION FACILITY. THE SITE LAYOUT WILL BE FINALIZED UPON COMPLETION OF SITE SURVEY AND FACILITY DESIGN.



verizon
WIRELESS COMMUNICATIONS FACILITY

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SIZE PRINTED MEDIA ONLY. ALL OTHER PRINTED
SIZES ARE DEEMED "NOT TO SCALE".

SUBMITTALS

- 0 10/10/20 REVISION
- 1 12/06/20 REVISED TOWER HEIGHT
- 2 12/23/20 REVISED PER CLIENT COMMENTS
- 3 10/21/22 REVISED FACILITY LOCATION
- 4 12/27/20 REVISED TOWER LOCATION
- 5 02/20/21 REVISED PER TOWER COMMENTS
- 6 03/02/23 REVISED TOWER TO MONOPINE

NO DATE DESCRIPTION

DRAWN BY: MF
CHECKED BY: DW

SITE NAME:

WILTON SOUTH CT

SITE ADDRESS:
TOWN OF WILTON
180 SCHOOL RD.
WILTON, CT 06897

SHEET TITLE:

WEST ELEVATION

SHEET NUMBER:

L-4