

VIA ELECTRONIC MAIL

April 28, 2023

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

RE **DOCKET NO. 515** - 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 east of the Student Transportation Parking Lot at 180 School Road, Wilton, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 19, 2023.

Please submit an original and 15 copies to the Council's office and an electronic copy to <u>siting.council@ct.gov</u>. 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 May 19, 2023 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,

Maluik Prael_

Melanie Bachman Executive Director

c: Service List dated March 17, 2023

Docket No. 515 Pre-Hearing Interrogatories Set One

General

- 1. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
- 2. Pursuant to CGS §16-500, please submit a copy of the lease for the proposed site.
- 3. 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?
- 4. Referencing Application pp. 21 & 22, how is the construction cost of the facility recovered?
- 5. Referencing Application p. 20, how many Town officials/area residents attended the November 2, 2022 public information meeting? Aside from visual impacts, were any other concerns raised by residents and town officials? If so, how were these concerns addressed?
- 6. Referencing p. 20 of the Application and Attachment 8, Visibility Analysis, provide the date and time of each crane test.

Site Search

- 7. Referencing Application pages 11 and 19, please submit a copy of the August 2021 Town of Wilton RFP.
- 8. 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

- 9. What is the maximum wind speed tolerance for the antennas on the proposed tower?
- 10. Would the tower and foundation be designed to accommodate an increase in tower height?
- 11. What is the structural design standard applicable to the proposed T-arm antenna mounts?
- 12. Would any blasting be required to develop the site?
- 13. Provide the total area for the construction limits of disturbance.

- 14. 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. What structural design codes apply to the tower and antenna mounts?
- 15. Referring to Application Attachment 12, the map legend indicates prime farmland soils are identified by a black "X." Are the prime farmland soils actually depicted by a white "X"? The map legend does not indicate how statewide important farmland soils are identified. Are the statewide important farmland soils depicted by an orange "O"? Explain.
- 16. Referring to Sheet C-1, Aerial Map Site Layout, there is a proposed underground electrical service connection northwest of the site and a possible alternate underground route southwest of the site depicted. Has a final electrical service connection route been determined? Explain.

Coverage/Capacity

- 17. Application pp. 6 and 8 and Attachment 6 indicate 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?
- 18. What is the signal strength for which Cellco designs its system? For in-vehicle coverage? For inbuilding coverage?
- 19. 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.
- 20. Does Cellco have any statistics on dropped calls and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does Cellco have any other indicators of substandard service in this area?
- 21. Application p. 8 provides the overall coverage footprint for different frequencies that would operate at the site. Does this data include areas that are covered by other adjacent Cellco sites and would overlap with coverage from the proposed site? If yes, what is the coverage footprint of new, reliable service from the proposed site?
- 22. In addition to coverage, would the proposed site also provide capacity relief to adjacent Cellco sites that are at or near exhaustion? If yes, provide information regarding these sites (location, sector, and frequency).
- 23. Would the proposed site provide adequate service to the coverage area for other frequencies that Cellco would deploy?
- 24. Referring to Application p. 12 has the host municipality or local emergency service providers expressed an interest in co-locating emergency services antennas?

Backup Power

- 25. Referring to Sheet C-4 and Application page 7, the propane tank is described as a 1,000 gallon propane tank and a 500 gallon propane tank, respectively. Confirm the size of the proposed propane tank.
- 26. What would be the run time for Cellco's propane generator before it would need to be refueled, assuming it is running at full load under normal conditions?
- 27. Referring to Application p. 10, for how long would the proposed back up battery system provide power to Cellco's equipment if the backup generator failed to start?
- 28. Could the proposed generator be shared by other carriers that may locate at the proposed facility? What effect would a shared generator have on the run time of the generator if at full load?

Public Safety

- 29. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
- 30. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?
- 31. Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?
- 32. Is the proposed facility located within a Department of Energy and Environmental Protection designated Aquifer Protection Area or within a public water supply watershed area?
- 33. Besides the backup power source, what other facility equipment generates noise? Would the noise from this equipment (non-backup power sources) comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?
- 34. Is lighting required at the facility? If so, for what purpose and what type would be installed?

Environment

- 35. Referencing Sheet C-2 of Attachment 1, provide the distance of Wetland 1 and Wetland 2 from the construction limits of disturbance.
- 36. Referencing Application p. 16 and Attachment 10, p. 2 of the Wetland Delineation Form, has Cellco conducted site surveys to determine the presence or absence of vernal pool species or will Cellco presume vernal pool species are present and develop a protection plan? Explain.
- 37. Referencing Application p. 19, it states the facility would be located outside the "1000 year flood zone." Should this be the 100-year flood zone?
- 38. Referencing Application Attachment 8, Visibility Analysis, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed facility.

- 39. Application Sheet C-4 states, "Tower Type Shown Requested by Town."
 - a. Describe the color and texture of the monopole.
 - b. How far off the monopole would the antennas extend?
 - c. How would the proposed antennas be screened? (i.e. socks or length of the branches?)
 - d. Would the monopine branches be thick enough and long enough to conceal Cellco's antennas and the antennas of other collocators?
 - e. Does Cellco have a vendor for tree tower designs?
 - f. Provide a photograph representative of the proposed facility design, including a description of features and identification of the tower manufacturer.
- 40. What is the height range of the surrounding tree canopy?
- 41. 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 sitespecific 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.