Robinson+Cole

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Also admitted in Massachusetts and New York

February 20, 2024

Via Electronic Mail and Hand Delivery

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

Re: Docket No. 519 – 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 11 Chamberlain Road in East Windsor, 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 February 27, 2024 evidentiary and public hearing sessions in Docket No. 519.

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

Sincerely,

Kunie MM_

Kenneth C. Baldwin

28851772-v1

Boston | Hartford | New York | Washington, DC | Providence | Miami | Stamford | Wilmington | Philadelphia | Los Angeles | Albany | rc.com

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF CELLCO PARTNERSHIP	:	DOCKET NO. 519
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 11	:	
CHAMBERLAIN ROAD, EAST WINDSOR,	:	
CONNECTICUT	:	FEBRUARY 20, 2024

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. <u>List of Witnesses</u>
 - 1. Elizabeth Glidden Real Estate/Regulatory Specialist, Verizon Wireless
 - 2. Mark Brauer, Radio Frequency Engineer, Verizon Wireless
 - 3. Carlo F. Centore, P.E. Centek Engineering
 - 4. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.
 - Matt Gustafson, Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.

B. <u>Exhibits to be offered</u>

Cellco intends to offer the following Exhibits:

- Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated October 26, 2023.
- 2. Bulk file exhibits including:
 - a. Town of East Winsor Zoning Regulations;
 - b. Town of East Winsor Inland Wetlands and Watercourses Regulations; and
 - c. Town of East Winsor Plan of Conservation & Development.
- 3. Cellco's Affidavit of Publication dated October 30, 2023.
- Cellco's Responses to Pre-Hearing Interrogatories (Set One) from the Council dated February 14, 2024.
- 5. Sign Posting Affidavit filed on February 14, 2024.

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. <u>Remote Public Comment Session</u>

Prior to the start of the Remote Public Comment Session, the Applicant's Engineer, Carlo F. Centore, P.E., will make a brief presentation describing the site features and proposed site improvements. Mr. Centore will refer to the Site Location Map, Partial Site/Survey Plan Layout (Sheet C-2), Compound Plan, Elevation and Antenna Configuration (Sheet C-4), each included in <u>Attachment 1</u> of Docket No. 519. Electronic copies of the Site Location Map, and Plan Sheets C-2 and C-4 are attached to this filing.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

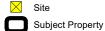
Z m mig ____ By:_

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



250

Legend



Approximate Parcel Boundary

<u>Map Notes:</u> Base Map Source: CT ECO 2019 Imagery Map Scale:1 inch = 500 feet Map Date: October 2023

Site Location Map

500 Feet Proposed Wireless Telecommunications Facility Broadbrook RELO CT 11 Chamberlain Road East Windsor, Connecticut





SURVEY NOTES

THIS SURVEY AND MAP HAS BEEN PREPARED IN ACCORDANCE WITH SECTIONS 20-300B-1 THIS UZVEY AND MAP HAS BEEN PREPARED IN ACCORDANCE WITH SECTIONS 20-300B-1 THRU 20-300B-20 OF THE REGULATIONS OF CONNECTICUT STATE AGENCIES — "MINIMUM STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ENDORSED IN THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. ON SEPT. 26, 1996. IT IS A COMPORING TO A HORIZONTAL ACCURACY CLASS D. THE LIMITED TOPOGRAPHIC SURVEY PORTION OF THIS PLAN CONFORMS TO A VERTICAL ACCURACY OF CLASS T-2 AND IS INTENDED TO BE USED TO DEPICT THE DELINEATED WETLANDS AND PROPOSED TELECOMMUNICATION FACILITY.

THE PROPERTY/BOUNDARY LINES (IF ANY) DEPICTED HEREON ARE COMPILED FROM OTHER MAPS, DEEDS, AND LIMITED FIELD SURVEY. THESE LINES ARE NOT TO BE CONSTRUED AS A BOUNDARY OPINION AND ARE SUBJECT TO A CHANGE AS AN ACCURATE FIELD SURVEY MAY DISCLOSE. PROPERTY MAY BE SUBJECT TO ENCUMBRANCES, EASEMENTS, RIGHTS OF WAY AS A TITLE SEARCH REPORT MAY DISCLOSE.

HORIZONTAL DATUM IS NAVD 88.

PARCEL OWNER OF RECORD: CROP PRODUCTION SERVICES INC 3005 ROCKY MOUNTAIN AVE LOVELAND, C0 80538 DEED REFERENCES: VOL 121 P. 476

PARCEL AREA = \pm 10.9

PARCEL IS IN "M-1" ZONING DISTRICT

PARCEL ID: MAP 057 BLOCK 58 LOT 012 EAST WINDSOR ASSESSOR'S OFFICE

UTILITIES SHOWN AS MARKED IN FIELD, NO SUBSURFACE INVESTIGATION WAS PERFORMED. NOT ALL IMPROVEMENTS SHOWN.

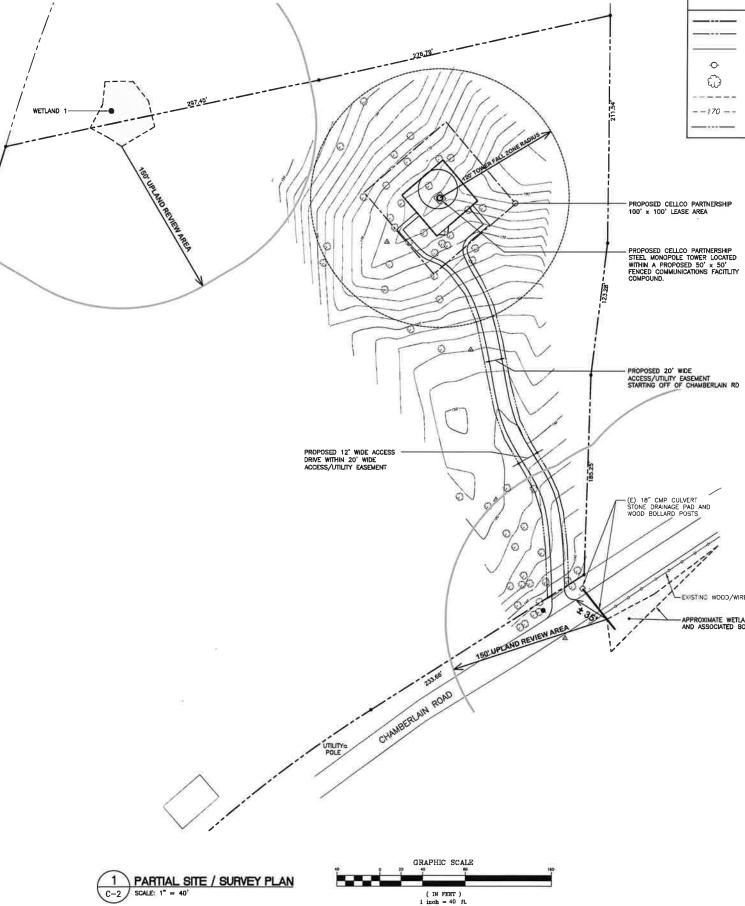
MAP REFERENCES

MAP ENTITLED "ZONING LOCATION PLAN FOR CROP PRODUCTION SERVICES 15 CHAMBLAIN ROAD" EAST WINDSOR, CONNECTCIUT, BY LANDMARK SURVEYS, LLC SCALE: 1" = 40'. DATED 10/12/2004 ON FILE IN THE EAST WINDSOR ZONING DEPARTMENT OFFICE.

4-10-12 R-1

WETLANDS REFERENCE NOTE:

DELINEATED WETLAND AREA 1, APPROXIMATE WETLAND BOUNDARY AND 150 FT UPLAND REVIEW AREAS SHOWN HEREIN ARE REFERENCED FROM WETLAND INSPECTION MAP PREPARED FOR VERIZON WIRLESS BY ALL POINTS TECHNOLOGY CORP., P.C. (APT) DATED MARCH, 2023.



DERRICK R, SCHULL P.E., LS. #15566 2401 CAMYRN'S CROSSING PANAMA CITY, FL 32405 (203) 530-997

	SYMBOLS LEGEND
	SUBJECT PROPERTY LINE
	ABUTTER PROPERTY LINE
	ROAD/ DRIVE
-0-	UTILITY POLE
ŵ	> 8" DECIDUOUS TREE
	2' CONTOUR LINE
170	10' CONTOUR LINE
	ACCESS EASEMENT (PROPOSED)

-EXISTING WOOD/WIRE GUARDRAIL APPROXIMATE WETLAND AREA AND ASSOCIATED BOUNDARY



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