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February 14, 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:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), enclosed please find the original and fifteen (15) copies of Cellco’s Responses to Council Interrogatories (Set One) related to Docket No. 519. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia
Enclosure

28863533-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
APPLICATION OF CELLCO PARTNERSHIP D/B/A : DOCKET NO. 519
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 14, 2024

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL INTERROGATORIES (SET ONE)

On February 2, 2024, the Connecticut Siting Council (“Council”) issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Docket No. 519. Below are Cellco’s responses.

Notice

Question No. 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?

Response

Certified mail receipts were received from all abutting property owners except the National Railroad Passenger Corporation (“NRPC”). The NRPC did, however, contact the applicant’s Counsel confirming receipt of the notice.

Question No. 2

Referencing Application p. 19, has Cellco received any comments since the Application

was submitted to the Council? If so, summarize the comments and how were these comments were addressed?

Response

Cellco has received no comments from the Town of East Windsor. Cellco was contacted, by phone and email by Tim Moore, an adjoining property owner to the east of the subject parcel. Mr. Moore expressed concern for the impact the tower might have on his current farming use and potential future use of his property as a campground. Mr. Moore also asked if Cellco would be willing to relocate the tower onto his property. Mr. Moore was told that Cellco was not interested in relocating the tower.

Proposed Site

Question No. 3

Quantify the amounts of cut and fill that would be required to develop the proposed facility.

Response

Total Fill: 0 Cubic Yards

Total Cut: 1,212 Cubic Yards

Net Cut: 1,212 Cubic Yards

Question No. 4

Would any blasting be required to develop the site?

Response

Cellco does not anticipate the need for blasting. If the Council approves the Docket No. 519 application, Cellco will perform a Geotechnical Survey of the tower site to determine the nature of sub-surface conditions. This information will be used in the design the tower and its foundation and assist in determining if blasting will be necessary to construct the approve tower.

Proposed Facility and Associated Equipment

Question No. 5

Would the tower and foundation be designed to accommodate an increase in tower height?

Response

If required by the Council, the tower and foundation could be designed to accommodate an increase in tower height, typically up to 20 feet, for future tower sharing. The 120-foot tower would be designed to accommodate up to four carriers.

Question No. 6

Would the existing facility be removed upon construction of the proposed facility?

Response

If required by the Council, Cellco will work with the Property owner (owner of the abandoned water tank) to have the existing water tank removed.

Question No. 7

Would a temporary facility be required for continued wireless service during construction? Would there be any lapse in wireless service during construction?

Response

No. A temporary facility will not be required during construction of the proposed facility. Cellco expects to continue operating the existing water tank wireless facility until the new tower site is constructed and operational, at which point the existing facility would be decommissioned.

Question No. 8

Would Cellco use its existing antennas and equipment from the existing site?

Response

No. Cellco would install new antennas and equipment at the new tower site and

decommission the equipment on the existing water tank once the new facility is operational.

Question No. 9

Referencing page 12 of the Application, T-Mobile has confirmed interest in relocating to the proposed facility. Has Cellco had further discussions with T-Mobile regarding when equipment would be relocated? Has Cellco received any details from T-Mobile regarding antenna and equipment requirements?

Response

No. Other than confirming its interest in sharing the new tower site, T-Mobile has not yet provided Cellco with any details about its plans to either relocate or use new equipment on the proposed tower.

Question No. 10

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?

Response

No.

Question No. 11

Referencing Application p. 21, how is the construction cost of the facility recovered?

Response

The costs associated with providing Cellco customers with the nation's most reliable wireless service network, including the cost for development of network infrastructure (small cells and macro-cells), are paid for by the individuals, corporations and government entities that purchase Cellco's wireless service.

Question No. 12

What measures are proposed for the site to ensure security and deter vandalism?

(Including alarms, gates, locks, anti-climb fence design, etc.)

Response

The proposed wireless facility compound will be surrounded by an eight (8) foot tall chain link security fence and gate. The gate will be locked with access limited to the wireless carriers sharing the facility. Cellco's wireless equipment will maintain separate silent intrusion alarms which are monitored remotely. Climbing pegs on the lower portion of the tower will also be removed to deter climbing of the tower.

Question No. 13

Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.
- National Electric Code (NFPA 70).
- 2021 International Mechanical Code, with the 2022 Connecticut State Building Code amendments.
- 2022 Connecticut State Fire Safety Code.
- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".
- Occupational Safety and Health Administration (OSHA).

Question No. 14

Is any portion of the proposed site, including the lease area and access road, currently in productive agricultural use?

Response

No.

Question No. 15

Referring to Application Attachment 12, how many acres of the total 3.3 acres of the Prime Farmland Soils would be disturbed by the proposed project and access road?

Response

The proposed tower site and access driveway will disturb a total of 0.16 acres of the 3.3 acres of Prime Farmland Soils on the Property.

Question No. 16

Referencing footnote 1 on page 2 of the Application, what are the significant challenges that would occur from reinforcing the existing water tank? What is the estimated cost of such reinforcement?

Response

Given the age and condition of the existing water tank structure, reinforcement measures would be challenging from both an engineering and construction perspective. While reinforcing the water tank may be possible, it is not practical, as the preliminary estimates for the construction on those reinforcements would exceed the cost of building a new tower and related facility on the subject parcel.

Proposed Wireless Services

Question No. 17

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?

Response

Cellco’s 700 MHz frequencies act as a “base frequency” or the main coverage frequency for its network throughout Connecticut. This frequency handles a large majority of Cellco’s wireless traffic. All of Cellco’s licensed frequencies (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3600 MHz, 3750 MHz) are used, however, to transmit both voice and data services. Cellco customers transfer seamlessly between Cellco’s operating frequencies during handoff between cell sites. Handoff can also occur between frequencies at an individual cell site for load balancing purposes. Subject to availability at a particular cell site, frequencies can also be used together (a feature called “carrier aggregation”) making more of the existing bandwidth available to a particular user.

Question No. 18

What is the signal strength for which Cellco designs its system? For in-vehicle coverage?
For in-building coverage?

Response

Neg 85 dBm RSRP for in building coverage.

Neg 95 dBm RSRP for in vehicle coverage.

Question No. 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.

Response

Given the increase in ground elevation from the existing water tank facility (G.E. 138 feet AMSL) to the proposed Broadbrook Relo tower location (G.E. 173.87 feet AMSL), Cellco could arguably reduce its antenna centerline height to provide the area with coverage comparable to what it sees today. However, given the rural nature of the area and the relative distances to its surrounding cell sites, Cellco is looking to enhance its service in the Broadbrook area to maximize the benefit of its new facility.

Question No. 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?

Response

For those antenna sectors pointed toward the Broadbrook Relo facility, Cellco currently experiences a dropped call rate of approximately 1.5% at its East Windsor North facility, 1% at its existing South Windsor North facility and 1.25% at its East Windsor 2 facility. Each of these rates are higher than Cellco's 0.5% dropped call rate design standard.

Question No. 21

Application p. 9 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?

Response

No. The table provided on page 9 of the Application shows coverage along area roadways and the overall coverage footprint, by frequency, for the Broadbrook Relo Facility

only.

Question No. 22

Referencing Application page 8, are sectors of the East Windsor and South Windsor North cell sites near exhaustion? Which sectors and frequencies? Why would the capacity relief be limited?

Response

In this context, the term “limited” means “minimal”. The proposed Broadbrook Relo Facility will provide minimal capacity relief to its existing East Windsor north and South Windsor North facilities. The antenna sectors facing the Broadbrook Relo Facility are not currently “in exhaust”, but Cellco does expect to see limited, or minimal traffic offloading of these sites due to the increased coverage footprint expected from the Broadbrook Relo Facility.

Question No. 23

Would the proposed site provide adequate service to the coverage area for other frequencies that Cellco would deploy?

Response

Yes. Cellco will achieve an overall increase in its antenna centerline height (approximately 35.87 feet higher, AMSL than the existing water tank site) on the proposed Broadbrook Relo Facility tower and will be able to deploy a full spectrum of wireless services on the new tower, all of which gives Cellco the opportunity to improve wireless service in the area.

Question No. 24

Referring to Application p. 12 has the Town of East Windsor or local emergency service providers expressed an interest in co-locating emergency services antennas?

Response

No.

Question No. 25

Are small cells a feasible alternative to Cellco's proposed installation? 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?

Response

It may be theoretically and technically possible to install a large number of small cells or Distributed Antenna System nodes in the area that could closely match the coverage footprint of the proposed Broadbrook Relo Facility (macro cell). Such an approach, however, is not practically nor economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes would utilize existing infrastructure (i.e. electric distribution poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other equipment (i.e. transformers, street lights and risers) that will limit Cellco's ability to use the pole. Structural limitations of the existing poles could also limit Cellco's ability to deploy all the equipment needed to provide service in all of its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is very difficult and, in many cases, impossible, making the service even more vulnerable to storms. In areas where this existing infrastructure is not available, for example, along private roads or on private and municipal properties, property rights would need to be acquired and new poles would need to be installed. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Facility is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed facility. Individual small cell would be capable of providing service in

some but not all of Cellco's operating frequencies further limiting network capacity in the area around the Broadbrook Relo Facility.

Emergency Backup Power

Question No. 26

What would be the run time for Cellco's diesel generator before it would need to be refueled, assuming it is running at full load under normal conditions?

Response

According to the generator specifications included in Attachment 7 in the Application, under normal loading conditions (50% generator capacity), the proposed 50-kW generator would consume 2.25 gallons of fuel per hour which equates to 111 hours of operation (4.6 days) before refueling would be necessary. At full load (100% generator capacity), the generator would consume 4.15 gallons of fuel per hour which equates to 60.24 hours of operation (2.5 days) before refueling would be necessary.

Question No. 27

Would the backup generator have containment measures to protect against fluid leakage?

Response

Yes. The 250-gallon diesel fuel belly tank included as a part of the generator unit. The generator fuel tank is double-walled and contains leak detection alarms, which are monitored 24/7 by Cellco's cell site technicians.

Question No. 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?

Response

No, the 50-kW diesel generator would not be large enough to be shared by one or carriers in addition to Cellco. The 50-kW capacity is designed to accommodate Cellco's backup power needs only. Without knowing precisely what an additional carriers might need for backup power, certainly, an appropriately sized generator could be shared by multiple carriers at this site. A larger generator (100-kW or larger) would, very likely, maintain a larger, perhaps external fuel tank, which would impact run times and refueling requirements. Without those details it is difficult to answer this question with any specificity.

Question No. 29

Referring to Application p. 11, for how long would the proposed back up battery system provide power to Cellco's equipment if the backup generator failed to start?

Response

The backup battery system is designed to keep the Cellco facility operating for up to eight (8) hours.

Public Health and Safety

Question No. 30

Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?

Response

Yes.

Question No. 31

Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 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?

Response

The proposed Broadbrook Relo Facility is located within the DEEP designated Hunt Wellfield Aquifer Protection Area. If the Broadbrook Relo Facility is approved, Cellco would implement a wetland, vernal pool, and aquifer protection area protection program to ensure that water quality is not adversely impacted. *See Attachment 1* - Resource Protection Measures. These Resource Protection Measures would be incorporated into the Development and Management Plan if the Docket is approved by the Council. The proposed Broadbrook Relo Facility is not located within a public water supply watershed.

Question No. 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 (DEEP) noise control standards at the property boundaries?

Response

Other than the backup generator, noise from the equipment cabinets will be produced by the equipment cooling fans and is minimal. Noise from both the battery and equipment cabinets is estimated to be 50 dBA at a distance of three (3) feet from the equipment. The nearest property line to the equipment is approximately 127 feet to the east. The maximum allowable noise emitted for developed residential districts per the DEEP noise standards is 61dBA during

the day and 51 dBA during the night.

Question No. 34

Is lighting required at the facility? If so, for what purpose and what type would be installed?

Response

No FAA marking, or lighting of the tower is required. Cellco will install timer-controlled LED lights above the equipment cabinets for use when and if cell site technicians need to be on site at night.

Environmental Effects and Mitigation Measures

Question No. 35

Referencing Application Attachment 11, when would Cellco submit the cultural resource study to the State Historic Preservation Office (“SHPO”)?

Response

Typically, Cellco makes its submission to the State Historic Preservation Office after the facility is approved by the Council. An earlier submission to the SHPO may be warranted if the preliminary screen uncovers a potential for the proposed facility to impact an historic or cultural resource in the area. In this case, the Preliminary Screen determined that no historic or cultural resources were identified within 0.5 miles of the Broadbrook Relo Facility.

Question No. 36

What, if any, stealth tower design options would be feasible to employ at this site, such as a water tank? What would be the cost of such stealth tower design?

Response

Cellco did not consider any stealth tower design alternatives for the Broadbrook Relo Facility tower, primarily because the tower would be set in an industrial area, maintaining

significant setbacks from adjacent land uses and structures on adjacent parcels. For example, the closest residence is more than 1,070 feet north of the proposed tower site.

Question No. 37

Referencing comments received from the Connecticut Airport Authority on January 9, 2024, would Cellco complete and submit a Form FAA 7460-1 to the FAA for approval?

Response

Yes.

Question No. 38

Referencing Application Attachment 10, the Wetland Inspection dated July 9, 2023 identifies the on-site vernal pool as a Tier I pool. The Wetland and Vernal Pool Inspection dated September 28, 2023 identifies the vernal pool as a Tier II pool. Clarify.

Response

Under Calhoun and Klemens Best Development Practices, a Tier 1 pool is defined as consisting of at least 1 of the three Biological Value indicators; a state-listed species (Endangered, Threatened or Special Concern) present or breeding within the pool, two or more vernal pool indicator species breeding in the pool, and 25 or more egg masses in the pool by the end of the breeding season while also having at least 75% of the vernal pool envelope or “VPE” (100 feet from the pool) undeveloped AND at least 50% of the critical terrestrial habitat or “CTH” (100-750 feet from the pool) undeveloped. A Tier 2 pool in contrast also requires at least 1 of the three Biological Value indicators to be present, but only one of the two buffer requirements (75% of the VPE undeveloped or 50% of the CTH undeveloped).

The vernal pool was originally identified in the July 9, 2023, Wetland Inspection Report as a Tier 1 pool on the merits of its productivity. At the time of this determination, a formal evaluation of the VPE and CTH development conditions was not analyzed. During the March 27,

2023, inspection, over 40 wood frog egg masses observed within the pool thereby satisfying one of the 3 Biological Value indicators justifying a potential Tier 1 vernal pool assessment. Upon completion of the pools buffer development, it was assessed over 50% of the CTH was currently developed (~60% developed in the existing condition). As such, the vernal pool would not be eligible as a Tier 1 pool due to the existing development condition exceeding 50% and is therefore assessed as a Tier 2 pool.

Question No. 39

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.

Response

See Attachment 2 – Remote Field Review.

ATTACHMENT 1

ENVIRONMENTAL NOTES - RESOURCES PROTECTION MEASURES

WETLAND, VERNAL POOL, AND AQUIFER PROTECTION AREA PROTECTION PROGRAM

As a result of the project's location in the vicinity of sensitive wetland resources that include a vernal pool and within an aquifer protection area, the following Protection Program shall be implemented by the Contractor to avoid unintentional impacts to proximate wetland resources, vernal pool, or mortality to vernal pool herpetofauna (i.e., wood frog, salamanders, turtles, etc.) and water quality impacts during construction activities.

The project is located within the Hunt Wellfield Aquifer Protection Area (CT DPH System ID CT0473011) operated by the Connecticut Water Company as part of its Western System that services the towns of East Windsor, Suffield, and Windsor Locks. The Aquifer Protection Area protection measures included herein satisfy typical recommendations by the Drinking Water Section of the Connecticut Department of Public Health.

It is of the utmost importance that the Contractor complies with the requirement for the installation of protective measures and the education of its employees and subcontractors performing work on the project site. The wetland protection measures shall be implemented and maintained throughout the duration of construction activities until permanent stabilization of site soils has occurred. Vernal pool protection measures should also be implemented throughout the duration of construction activities with a particular focus during peak amphibian movement periods (early spring breeding [March 1st to May 15th] and late summer dispersal [July 15th to September 15th]).

All-Points Technology Corporation, P.C. ("APT") will serve as the Environmental Monitor for this project to ensure that these protection measures are implemented properly and will provide an education session on the project's proximity to sensitive wetland and vernal pool resources prior to the start of construction activities and typical amphibians and reptiles associated with these habitats that may be encountered during construction. The Contractor shall contact Dean Gustafson, Senior Wetland Scientist at APT, at least 5 business days prior to the pre-construction meeting. Mr. Gustafson can be reached by phone at (860) 552-2033 or via email at dgustafson@allpointstech.com.

The Connecticut Water Company will be contacted at least 3 business days prior to the pre-construction meeting with an invitation to attend the pre-construction meeting. The Connecticut Water Company personnel shall also be allowed to periodically inspect this project during construction to ensure that the Aquifer Protection Area water quality is not adversely impacted.

This resources protection program consists of several components including: education of all contractors and sub-contractors prior to initiation of work on the site; installation of erosion controls; petroleum materials storage and spill prevention; protective measures; rare species protection measures; herbicide, pesticide, and salt restrictions; and, reporting.

1. Contractor Education:

- a. Prior to work on site and initial deployment/mobilization of equipment and materials, the Contractor shall attend an educational session at the pre-construction meeting with APT. This orientation and educational session will consist of information such as, but not limited to: identification of wetland

and vernal pool resources proximate to work areas, representative photographs of typical herpetofauna that may be encountered, typical species behavior, and proper procedures if species are encountered, and the environmentally sensitive nature of the development site.

- b. The meeting will further emphasize the non-aggressive nature of the rare species, the absence of need to destroy such animals and the need to follow Protective Measures as described in following sections. The Contractor will designate one of its workers as the "Project Monitor", who will receive more intense training on the identification and protection of herpetofauna.
- c. The Contractor will designate a member of its crew as the Project Monitor to be responsible for the periodic "sweeps" for herpetofauna (and other possible wildlife) within the construction zone each morning and for any ground disturbance work. This individual will receive more intense training from APT on the identification and protection of herpetofauna in order to perform sweeps. Any herpetofauna (or other wildlife) discovered would be translocated outside the work zone in the general direction the animal was oriented.
- d. The Contractor's Project Monitor will be provided with cell phone and email contacts for APT personnel to immediately report any encounters with herpetofauna. Educational poster materials will be provided by APT and displayed on the job site to maintain worker awareness as the project progresses.
- e. APT will also post Caution Signs throughout the project site for the duration of the construction project providing notice of the environmentally sensitive nature of the work area, the potential for encountering various amphibians and reptiles and precautions to be taken to avoid injury to or mortality of these animals.

2. Erosion and Sedimentation Controls/Isolation Barriers

- a. Plastic netting used in a variety of erosion control products (i.e., erosion control blankets, fiber rolls [wattles], reinforced silt fence) has been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. No permanent erosion control products or reinforced silt fence will be used on the project. Temporary erosion control products that will be exposed at the ground surface and represent a potential for wildlife entanglement will use either erosion control blankets and fiber rolls composed of processed fibers mechanically bound together to form a continuous matrix (netless) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.
- b. The extent of the erosion controls will be as shown on the site plans. The Contractor shall have additional sedimentation and erosion controls stockpiled on site should field or construction conditions warrant extending devices. In addition to the Contractor making these determinations, requests for additional controls will also be at the discretion of the Environmental Monitor.
- c. Installation of erosion and sedimentation controls, required for erosion control compliance and creation of a barrier to possible migrating/dispersing wildlife, shall be performed by the Contractor if any

soil disturbance occurs or heavy machinery is anticipated to be used on slopes. The Environmental Monitor will inspect the work zone area prior to and following erosion control barrier installation. In addition, work zones will be inspected prior to and following erosion control barrier installation to ensure the area is free of herpetofauna and other wildlife and satisfactorily installed. The intent of the barrier is to segregate the majority of the work zone from possible herpetofauna and other wildlife species, in addition to serving as an erosion control device. Oftentimes complete isolation of a work zone is not feasible due to accessibility needs and locations of staging/material storage areas, etc. In those circumstances, the barriers will be positioned to deflect migrating/dispersal routes away from the work zone to minimize potential encounters with herpetofauna/wildlife at the discretion of the Environmental Monitor.

- d. The Contractor shall be responsible for daily inspections of the sedimentation and erosion controls for tears or breeches and accumulation levels of sediment, particularly following storm events that generate a discharge, as defined by and in accordance with applicable local, state and federal regulations. The Contractor shall notify the APT Environmental Monitor within 24 hours of any breeches of the sedimentation and erosion controls and any sediment releases beyond the perimeter controls that impact wetlands, the vernal pool, or areas within 100 feet of wetlands. The APT Environmental Monitor will provide periodic inspections of the sedimentation and erosion controls throughout the duration of construction activities only as it pertains to their function to protect nearby wetlands. Such inspections will generally occur once per month. The frequency of monitoring may increase depending upon site conditions, level of construction activities in proximity to sensitive receptors, or at the request of regulatory agencies. If the Environmental Monitor is notified by the Contractor of a sediment release, an inspection will be scheduled specifically to investigate and evaluate possible impacts to wetland resources.
- e. Third party monitoring of sedimentation and erosion controls will be performed by other parties, as necessary, under applicable local, state and/or federal regulations and permit conditions.
- f. No equipment, vehicles or construction materials shall be stored within 100 feet of wetland or vernal pool resources.
- g. All silt fencing and other erosion control devices shall be removed within 30 days of completion of work and permanent stabilization of site soils. If fiber rolls/wattles, straw bales, or other natural material erosion control products are used, such devices will not be left in place to biodegrade and shall be promptly removed after soils are stable so as not to create a barrier to wildlife movement. Seed from seeding of soils should not spread over fiber rolls/wattles as it makes them harder to remove once soils are stabilized by vegetation.

3. Petroleum Materials Storage and Spill Prevention

- a. Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location within an Aquifer Protection Area and in proximity to wetland and vernal pool resources.
- b. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.
- c. Servicing of machinery shall not occur within 100 feet of wetlands.
- d. At a minimum, the following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.
 - i. Petroleum and Hazardous Materials Storage and Refueling
 1. Refueling of vehicles or machinery shall occur a minimum of 100 feet from wetlands and shall take place on an impervious pad with secondary containment designed to contain fuels.
 2. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands.
 - ii. Initial Spill Response Procedures
 1. Stop operations and shut off equipment.
 2. Remove any sources of spark or flame.
 3. Contain the source of the spill.
 4. Determine the approximate volume of the spill.
 5. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby wetlands and vernal pool.
 6. Ensure that fellow workers are notified of the spill.
 - iii. Spill Clean Up & Containment
 1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
 2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
 3. Isolate and eliminate the spill source.
 4. Contact appropriate local, state and/or federal agencies, as necessary.
 5. Contact a disposal company to properly dispose of contaminated materials.
 - iv. Reporting
 1. Complete an incident report.
 2. Submit a completed incident report to local, state and federal agencies, as necessary, including the Connecticut Water Company and Connecticut Siting Council.

4. Wetland and Vernal Pool Protective Measures

- a. A thorough cover search of the construction area will be performed by APT's Environmental Monitor prior to and following installation of the silt fencing barrier to remove any wildlife from the work zone prior to the initiation of construction activities. Any wildlife discovered would be translocated outside the work zone in the general direction the animal was oriented. Periodic inspections will be performed by APT's Environmental Monitor throughout the duration of the construction, generally on a monthly basis.
- b. Any stormwater management features, ruts or artificial depressions that could hold water created intentionally or unintentionally by site clearing/construction activities will be properly filled in and permanently stabilized with vegetation to avoid the creation of "decoy pools" that could intercept amphibians potentially moving through the project area. Stormwater management features such as level spreaders will be carefully reviewed in the field to ensure that standing water does not endure for more than a 24-hour period to avoid creation of decoy pools and may be subject to field design changes. Any such proposed design changes will be reviewed by the design engineer to ensure stormwater management functions are maintained.
- c. Erosion control measures will be removed no later than 30 days following final site stabilization so as not to impede wildlife movements.

5. Herbicide, Pesticide, and Salt Restrictions

- a. The use of herbicides and pesticides at the Facility shall be minimized. If herbicides and/or pesticides are required at the Facility, their use will be used in accordance with current Integrated Pest Management ("IPM") principles with particular attention to avoid/minimize applications within 100 feet of wetland and vernal pool resources.
- b. Maintenance of the facility during the winter months shall minimize the application of chloride-based deicers salt with use of more environmentally friendly non-chloride alternatives.

6. Reporting

- a. Compliance Monitoring Reports (brief narrative and applicable photos) documenting each APT inspection will be submitted by APT to the Permittee and its Contractor for compliance verification of these protection measures. These reports are not to be used to document compliance with any other permit agency approval conditions (i.e., DEEP Stormwater Permit monitoring, etc.). Any non-compliance observations of erosion control measures or evidence of erosion or sediment release will be immediately reported to the Permittee and its Contractor and included in the reports along with any observations of vernal pool herpetofauna.
- b. Following completion of the construction project, APT will provide a final Compliance Monitoring Report to the Permittee documenting implementation of the wetland and vernal pool protection program and monitoring observations. The Permittee is responsible for providing a copy of the final Compliance Monitoring Report to the Connecticut Siting Council for compliance verification.

- c. Any observations of rare species will be reported to CTDEEP by APT, with photo-documentation (if possible) and with specific information on the location and disposition of the animal.

ATTACHMENT 2

REMOTE FIELD REVIEW



CT SITING COUNCIL DOCKET NO. 519
RESPONSE TO INTERROGATORY #39
BROADBROOK RELO CT
11 CHAMBERLAIN ROAD
EAST WINDSOR, CT

PREPARED FOR:

verizon✓

PREPARED BY:

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

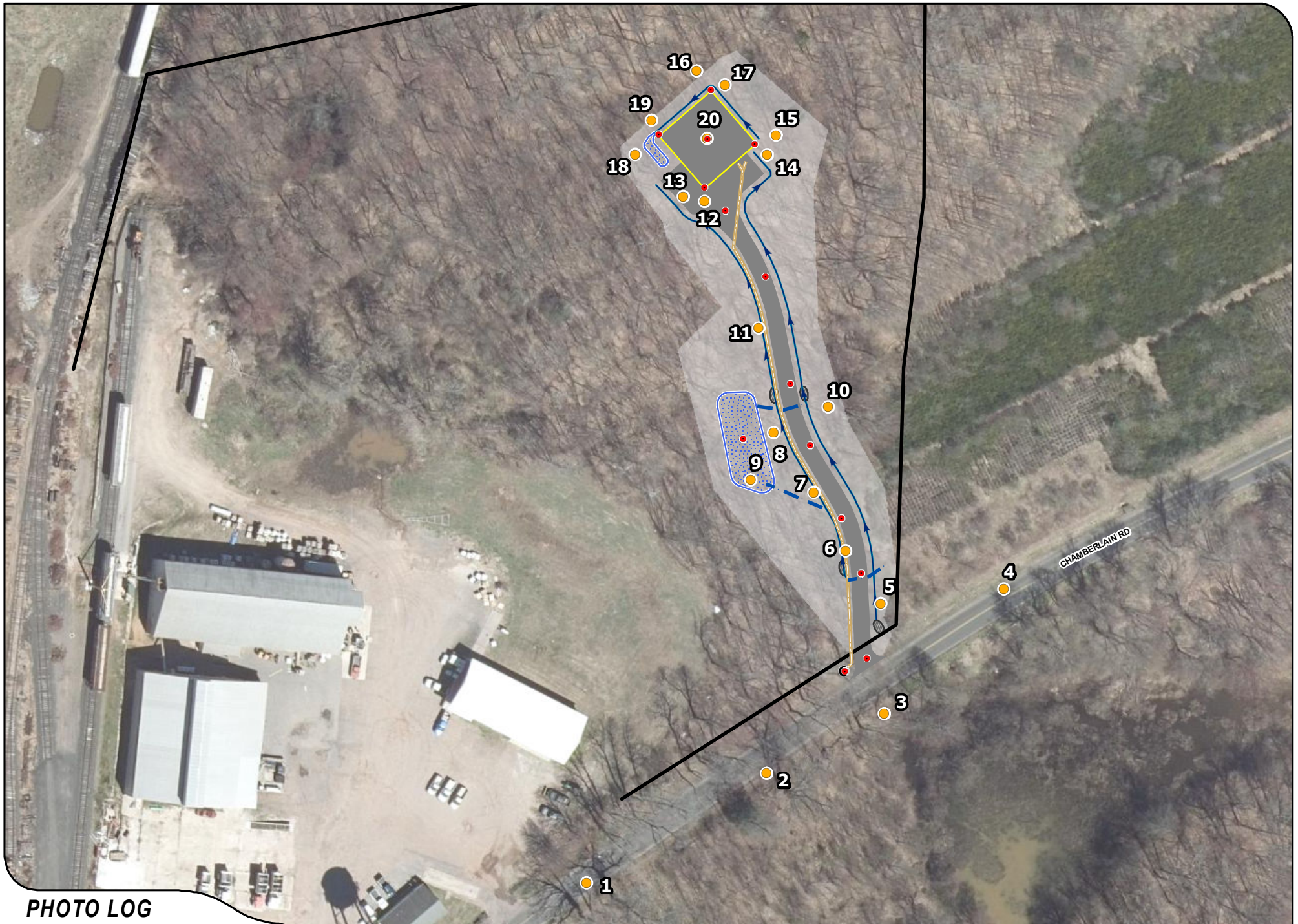
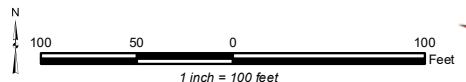


PHOTO LOG

- Photo Locations
- Photo Marker
- Property Boundary
- Proposed Compound
- Proposed Gravel Access Drive
- Proposed Stormwater Basin
- Proposed Stormwater Riprap
- Proposed U/G Elec. & Telco
- Proposed Stormwater Drainage
- Proposed Drainage Swale
- Proposed Utility Pole





PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

1

CHAMBERLAIN ROAD LOOKING NORTHEAST



PHOTOGRAPHED ON 2/7/2024

PHOTO

2

DESCRIPTION

CHAMBERLAIN ROAD LOOKING NORTHEAST



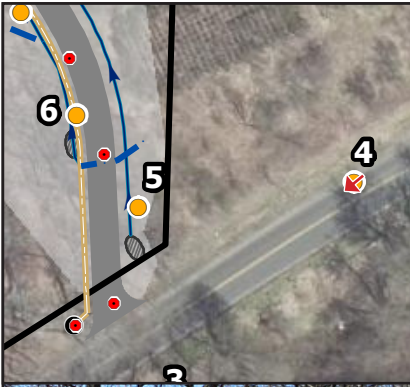
PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

3

CHAMBERLAIN ROAD LOOKING NORTH TOWARDS PROPOSED ACCESS DRIVE



PROPOSED GRAVEL ACCESS DRIVE

PHOTO

DESCRIPTION

4

CHAMBERLAIN ROAD LOOKING SOUTHWEST TOWARDS PROPOSED ACCESS DRIVE

PHOTOGRAPHED ON 2/7/2024



PHOTO

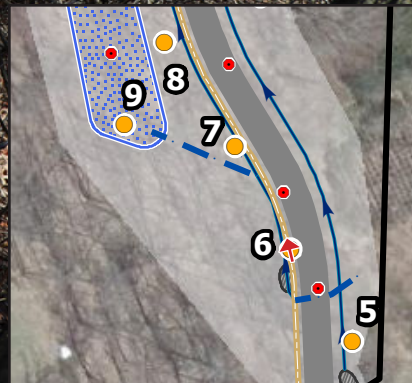
DESCRIPTION

5

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTH



PROPOSED GRAVEL ACCESS DRIVE



PHOTO

DESCRIPTION

6

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTH



PROPOSED GRAVEL ACCESS DRIVE

PHOTO

DESCRIPTION

7

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTH

PHOTOGRAPHED ON 2/7/2024



PROPOSED GRAVEL ACCESS DRIVE

PHOTO

DESCRIPTION

8

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTH



PROPOSED STORMWATER BASIN

PHOTO

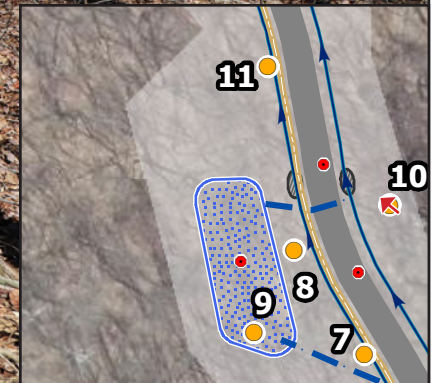
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DESCRIPTION

PROPOSED STORMWATER BASIN LOOKING NORTH



PROPOSED GRAVEL ACCESS DRIVE



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

10

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTHWEST



PHOTO

DESCRIPTION

11

PROPOSED GRAVEL ACCESS DRIVE LOOKING NORTH



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

12

PROPOSED TURN-AROUND LOOKING NORTHWEST



PHOTO

DESCRIPTION

13

PROPOSED TURN-AROUND LOOKING NORTHEAST



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

14

EAST OF PROPOSED COMPOUND LOOKING NORTHWEST



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

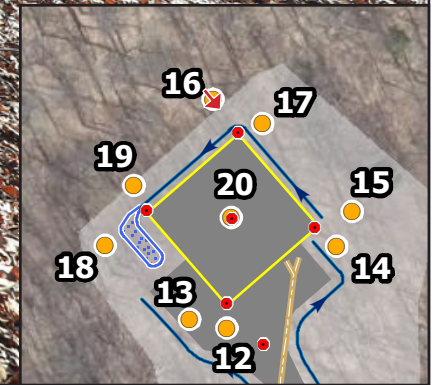
15

EAST OF PROPOSED COMPOUND LOOKING SOUTHWEST



PROPOSED FENCE CORNERS

PROPOSED TOWER



PHOTO

DESCRIPTION

16

NORTH OF PROPOSED COMPOUND LOOKING SOUTHEAST

PHOTOGRAPHED ON 2/7/2024



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

17

NORTH OF PROPOSED COMPOUND LOOKING SOUTHWEST



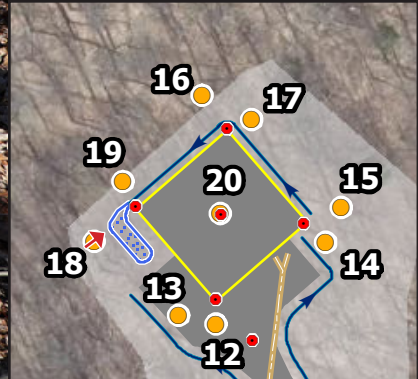
PROPOSED FENCE CORNERS

PHOTO

DESCRIPTION

18

WEST OF PROPOSED COMPOUND LOOKING NORTHEAST



PHOTOGRAPHED ON 2/7/2024



PHOTOGRAPHED ON 2/7/2024

PHOTO

DESCRIPTION

19

WEST OF PROPOSED COMPOUND LOOKING SOUTHEAST

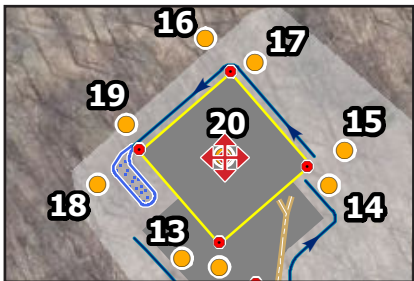


PHOTO	DESCRIPTION
20	VIEW FROM PROPOSED TOWER - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 2/7/2024