

## Docket No. 535 —

### **Intervenor’s Targeted Addendum: Interrogatories & Requests for Production (CTS site)**

*This addendum keys questions to the Applicant’s own statements in Attachment 1 of Council’s Set-One interrogatories*

Non-Duplication & Scope. These interrogatories are centered on and limited to clarifying or supplementing the Council’s Set-One Interrogatories and the Applicant’s responses. They seek (a) resolution of internal inconsistencies in Applicant Attachment 1, (b) the native data and methods underlying Set-One answers, and (c) current status of agency coordination/permits.

**Cross-Reference Rule.** If a question was answered previously, the Applicant may cross-reference by pinpoint citation (document title + page/figure/response number) and attach the native files (KMZ/KML/shapefile/GeoJSON, RFDS, CSV/XLSX) used for that answer. General references like “see prior response” are insufficient.

#### **A. Wetlands, Access Road, and Internal Consistency**

1. Reconcile: (i) “existing farm road extends between two existing wetland areas” (Site Evaluation §I.E) vs. (ii) “no ... wetlands ... in the area to be used; closest wetland ≈117 ft north” (Env. Assessment §I.A). Provide flagged survey (flag numbers), soils test pits/logs, delineation methods/dates, and a plan overlay of compound, access, and utilities relative to flagged wetlands/upland review.
2. Provide on-parcel alternative layouts/access alignments that avoid/minimize wetlands crossings, with side-by-side clearing lengths, culvert counts/sizes, and temporary matting/boardwalk needs; give technical reasons for rejection of each.
3. Confirm access length (~930 ft). Quantify permanent footprint within wetlands/100-ft upland review (sq ft), tree clearing (count by DBH class for the ~75 “substantial trees”), and cut/fill volumes; file DEEP Construction Stormwater GP, SWPPP, and E&S plan.
4. Identify whether underground power/fiber from Route 169 crosses wetlands. If yes, provide trenchless options (boring/HDD), dewatering, and turbidity controls.
5. State whether USACE authorization is required (e.g., Nationwide Permit). If yes, produce the PCN/verification; if no, cite the legal/technical basis.
6. Provide CT DEEP NDDB correspondence and any time-of-year restrictions.

#### **B. Floodplain, Equipment Elevation, and Visual Screening**

1. Identify FEMA flood zone(s) and BFE at compound/access; state proposed platform elevations(radios/batteries/generator) and freeboard for the 1%-annual-chance event.
2. Provide visual simulations that include any equipment elevated above the fence line; add views from Route 169and nearby lakes/pond vantage points.
3. Provide a landscape/screening plan (species, growth rate, mature height, spacing) sized to screen within 2–3 growing seasons, with maintenance commitments.
4. Photo-sim methodology: camera height (~5 ft AGL), lens/FOV, GPS of viewpoints, date/time, leaf-on/off, lighting; state whether balloon/crane tests were used (height/GPS).

### **C. RF Compliance (Cumulative) and Signage**

1. Provide worst-case cumulative OET-65 modeling for all authorized transmitters (e.g., 700/850/1900/2100/CBRS/C-Band as applicable) at the 145-ft AGL centerline, reporting % of general-public MPE at fence line, property lines, nearest residence/school/park/trail, and on a 5–10 m ground grid.
2. Commit to post-activation field measurements within 30 days of full activation and after material modifications (method per Exhibit M); file results to the docket.
3. Provide an RF signage & access-control plan: sign locations/wording/symbols; mounting height 4–6 ft AGL; boundary-legible sizing (ANSI Z535) and placement visible to the public.
4. Produce the CSV/XLSX grid behind the RF plots: PointID, lat, lon, height (m AGL), band, %MPE, and cumulative %MPE.
5. Certify harmonics/out-of-band suppression at the antenna after all filters, including 700 MHz 4th harmonic (~2.8 GHz), with manufacturer test data.

### **D. Height Justification and Least-Intrusive Means**

1. Provide height-sensitivity plots at 150/140/130/120 ft AGL using identical thresholds/extent; quantify population and road-mile coverage for each height; explain why lower heights fail Verizon's service objective.
2. Provide a collocation/alternatives matrix for all macros within 5–8 miles (incl. Pomfret Center A/B): IDs, heights, structural reserve/feasibility, azimuth clearances, and predicted coverage delta versus the proposal.

3. Provide a small-cell expansion analysis for the Woodstock Fairgrounds (existing nodes), with costs/timing/coverage compared to the macro proposal.
4. Identify the carrier(s) for whom the facility is proposed and produce the carrier drive-test package: tools, device models/firmware, test dates/times, routes, and KPIs (RSRP/RSRQ/SINR, VoLTE CSSR, drop/blocked calls, P50/P90 throughput). (*If produced before, provide pinpoint citations and native datasets.*)

#### **E. Generator, Noise, Fuel, and SPCC**

1. Confirm generator make/model and sound rating (plans show ~65 dBA @ 7 m). Provide octave-band predictions at lease line and nearest residence (~250 ft), demonstrating compliance with CT RCSA §22a-69 day/night, including ground absorption/barrier effects and any tonal/impulse penalties.
2. Disclose fuel capacity and containment (plans show UL-listed double-wall ~210 gal with 125% containment). Provide an SPCC Plan if aggregate on-site oil  $\geq 1,320$  gal; if below, provide  $\geq 110\%$  secondary containment and refueling SOP (no fueling within 250 ft of waters).
3. Provide emergency shutdown and refueling logistics during flood events; identify spill kits and contractor contacts.

#### **F. Landowner Influence and Lease Terms**

1. Produce a redacted lease summary identifying permitted height, rights to add tenants/equipment, expansion pads, fuel storage, environmental indemnity, and any incentives tied to tenant count/height.
2. Identify whether the on-parcel location was selected by landowner, carrier, or tower company; produce correspondence documenting on-parcel siting decisions.
3. File the executed ground lease (payments redacted) and recorded access/utility easements, plus a one-page lease terms summary.

#### **G. Coordinates, FAA & Consistency**

1. Provide final WGS-84 coordinates (tower centerline and lease corners), AGL and AMSL; certify the same values were used for FAA Part 77, ROC, EME, and photo-sims.
2. State whether FAA Form 7460 will be filed; if not, cite the 14 CFR §77.9 exemption and the maximum height at which filing would be triggered; commit to revised photo-sims if lighting/markings becomes required.

**Production Format.** Bates-label all productions and include native GIS & RF files (KML/KMZ or shapefiles/GeoJSON, RFDS, modeling inputs/outputs, and CSV/XLSX tables) using the same thresholds/scales as accompanying PDFs.

**Responses Due.** Please provide complete responses within 14 calendar days of service, or as otherwise directed by the Council's schedule. Data-heavy items may be produced on a rolling basis, provided that the native datasets are included with each tranche.

**Global Instructions.** Use WGS-84 coordinates and state units. Identify software & version, propagation/clutter model, and map resolution; include date of analysis and engineer name/credentials. If claiming confidentiality, provide a public technical summary and seek a protective order rather than refusing.

**Certificate of Service — Docket No. 535**

I certify that on the date below a copy of the foregoing was served via electronic mail to the Connecticut Siting Council and to all parties and intervenors of record for Docket 535 as reflected on the Council's service list.

Date: 8.26.25

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