



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

June 30, 2025

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RE **DOCKET NO. 535** - The Towers, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 835 Norwich Worcester Turnpike (Route 169), Woodstock, Connecticut. **Council Interrogatories to the Applicant.**

Dear Attorney Baldwin and Attorney Schaefer:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 14, 2025.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). 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 July 14, 2025 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,

Melanie Bachman  
Executive Director

Enclosure: Revised Schedule dated June 30, 2025  
c: Service List dated April 7, 2025



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**REVISED SCHEDULE**

**DOCKET NO. 535** - The Towers, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 835 Norwich Worcester Turnpike (Route 169), Woodstock, Connecticut.

Application received	04/07/2025
Completeness review	05/01/2025
Council Interrogatories	
• Set-One Issued	06/30/2025
• Set-One Responses due	07/14/2025
Pre-hearing conference via Zoom remote conferencing – 11:00 a.m.	06/25/2025
<b>Deadline for Exchange of Interrogatories between Parties and Intervenors</b>	07/17/2025
<b>Deadline for pre-filed testimony and responses to interrogatories</b>	07/24/2025
Deadline for State Agency Comments	07/24/2025
Deadline for Municipal Comments	07/24/2025
Deadline to request Party/Intervenor status	07/24/2025
<b>Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing (refer to Hearing Information section on Docket 535 project webpage for Zoom remote conferencing log in/call in)</b>	<b>07/31/2025</b>
Continued Evidentiary Session(s) ( <i>if necessary</i> )	TBD
Close of Evidentiary Record	TBD
Close of Public Comment Period	TBD
Draft Findings of Fact	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
<b>Deadline for Final Decision</b>	<b>09/04/2025</b>

Siting Analyst: Adam Morrone

**Docket No. 535**  
**835 Norwich Worcester Turnpike (Route 169)**  
**Woodstock, Connecticut**

**The Towers, LLC**  
**Pre-Hearing Interrogatories**  
**Set One**

**Notice**

1. Referencing Application p. 4, and 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?
2. Referencing Application p. 4 has The Towers, LLC (TT) received any comments since the application was submitted to the Council? If yes, summarize the comments and how these comments were addressed.
3. Referencing Application p. 11 and Attachment 16, TT held a public information meeting at the Woodstock Town Hall on February 20, 2025. How were the comments and concerns addressed?
4. Describe outreach efforts to each member of the State legislature whose district encompasses the proposed facility site.

**Site Search**

5. Referencing Application pp. 3-4 and Attachment 8, when did Vertical Bridge REIT, LLC (VB) and Cellco Partnership d/b/a Verizon Wireless (Cellco) each initiate a site search? Was the site search a collaborative effort or was it conducted separately?
6. Referencing Application p. 4 and Attachment 8, identify the approximate center and radius of the site search area.
7. Referencing Application Attachment 8 – Site Search Summary, please provide the distances of the sites investigated to the proposed site.
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?

### **Proposed Site**

9. What is the distance of the centerline of the proposed tower from the nearest portion of the host parcel that is accessible to the public?
10. Would TT conduct a geotechnical survey prior to construction on the proposed site? If so, please describe how the survey would be conducted. Would tree removal be necessary?
11. Have the Town of Woodstock and/or any other entity expressed an interest in collocating antennas at the proposed facility?

### **Proposed Facility and Associated Equipment**

12. 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?
13. Referencing Application p. 13, how is the construction cost of the facility recovered for both VB and Cellco?
14. What is the maximum wind speed tolerance for the antennas/antenna mounts on the proposed tower?
15. Would the proposed tower require any maintenance, such as painting? If yes, approximately how often and at what cost?
16. Would the tower and foundation be designed to accommodate an increase in tower height?
17. Could the tower be designed with a yield point to ensure that the tower setback radius remains outside of Wetland 1?
18. What is the structural design standard applicable to the proposed platform antenna mounts?
19. Referencing Application p. 5 and Attachment 16, the Woodstock Conservation Commission on page 2 of 6 recommended the proposed tower be camouflaged as a silo or tree. What, if any, stealth tower design options would be feasible to employ at this site? Please explain the effectiveness of each design and provide costs related to each design.

### **Proposed Wireless Services**

20. Referencing Application p. 3 and Attachment 8, besides the six existing facilities within the four mile radius of the proposed tower, are there any other existing towers that Cellco is not currently located on?
21. What nearby wireless facilities (or sectors) are nearing capacity limits? At what frequencies? Please include a projected exhaustion date for each of these sectors. Would the deployment of the Woodstock 2 facility be sufficient to address these capacity concerns or would an additional facility be required in the near term to off-load traffic?
22. How would the proposed facility interact with the facility proposed in Docket No. 534 (TT application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 90 Woodstock

Avenue West (Route 171), Woodstock, Connecticut). Provide the distance and direction between the two proposed facilities.

23. Would parts of overlapping service be handled by the existing sites, thus lessening the effective service area of the proposed site? If so, what would be the effective service area for the 700 MHz frequency? Please explain.
24. Are all frequencies used to transmit voice and data?
25. 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?
26. Would the proposed site provide adequate service to the coverage area for all frequencies that Cellco would deploy?
27. Referring to Application Attachment 6, what is Cellco’s minimum required signal strength for in-vehicle coverage and for in-building coverage for all the proposed frequencies.
28. 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.
29. 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?
30. What is Cellco’s existing and predicted coverage footprint from the proposed site (in square miles), at each frequency that would be installed?
31. Referencing Application pp. i, 1, 3 and Attachment 6, what is the length of the service gap on Route 169?
32. Have any other wireless carriers expressed an interest in co-locating on the proposed facility to date?
33. Referencing Application pp. i, 1, 3 and Attachment 6, provide a table that lists each of the proposed frequencies and the corresponding proposed service for the nearby portion of Route 169 and the surrounding local roads, in linear miles, and the land area of the proposed coverage footprint in square miles, as represented in the example below:

Street Name	700 MHz Coverage Gap	1900 MHz Coverage Gap	2100 MHz Coverage Gap
Route 2	2.5 miles	5 miles	4.5 miles
Route 32	1.0 mile	3 miles	2 miles
Route 87	0.5 mile	2.5 miles	1 mile
Interstate 395	2.5 miles	2.5 miles	2.5 miles
<b>State Road Total</b>	6.5 miles	13 miles	10 miles

<b>Overall Coverage Footprint</b>	49 square miles	6 square miles	7.5 square miles
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34. Would flush-mounted antennas provide the required coverage? Would the flush-mount configuration result in reduced coverage and/or necessitate greater antenna height with multiple levels of antennas? Explain.

### **Emergency Backup Power**

35. Referencing Application p. 2 and 12, does Cellco propose to install a 50-kW diesel-fueled generator or a propane-fueled generator?
36. Referencing Application pp. 2, 12 and Attachments 1, 7, what would be the estimated runtime for Cellco's proposed 50 kW diesel-fueled generator or propane fueled generator before it would need to be refueled, assuming it is running at full load under normal conditions?
37. Referencing Application pp. 2, 12 and Attachments 1, 7, for how long would the emergency battery backup system be able to provide power to Cellco's equipment if the backup generator failed to start?
38. Referencing Application p. 2, at what frequency and duration would the proposed backup generator be exercised for maintenance purposes? Would this be scheduled for daytime hours?
39. 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?
40. Would the proposed backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

### **Public Health and Safety**

41. 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?
42. How would the site be secured during construction to ensure public safety?
43. Referencing Application Attachment 1, provide the percentage Federal Communications Commission Maximum Permissible Radiofrequency Exposure from the antennas at the following points:
- a) The nearest parking area on the host parcel; and
  - b) The nearest point at any of the structures on the host parcel.
44. Once constructed, what measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
45. Would Cellco's antennas comply with federal E911 requirements?
46. Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?
47. Is the proposed facility located within a Department of Energy and Environmental Protection (DEEP) designated Aquifer Protection Area or within a public water supply watershed area?

48. Besides the backup power source, what other facility equipment generates noise? Would the noise from this equipment (non-backup power sources) comply with state noise control standards at the property boundaries?
49. Referencing comments received from the Connecticut Airport Authority on May 8, 2025, would TT complete and submit a Form FAA 7460-1 to the FAA for approval.
50. Would notice to the FAA be necessary for a crane during construction? Explain.
51. Is lighting required at the facility? If so, for what purpose and what type would be installed?

### **Environmental Effects and Mitigation Measures**

52. Referencing Attachment 9 – Visual Resources Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower.
53. Referencing Application Attachment 16, the Woodstock Conservation Commission notes on page 2 of 6 that Route 169 is a designated National Scenic Highway. How would TT lessen the scenic view impact described by the Commission?
54. Referencing Application Attachment 11, the Wetland Inspection Report notes the wetlands on either side of the existing access road were divided. How could TT enhance the habitat and species dispersion related to the wetland complex?
55. Referencing Application p. 7, TT will comply with Connecticut Guidelines for Soil Erosion and Sediment Control. Would the Project also comply with Connecticut Stormwater Quality Manual, effective March 30, 2024?
56. Referencing Attachment 13 - Farmland Soils Map, provide the acreage of disturbance of these soils for the site.
57. Referencing Application Attachment 1, Sheet Z-3.1, there is an existing stone wall with breaks at certain points parallel to the existing access road. Would TT maintain the existing stone wall or modify and/or remove any portions of the stone wall for construction of the proposed tower?
58. Referencing Application Attachment 1, Site Evaluation Report, the topography on the property slopes down from Route 169 to the tower site. What flood protections are proposed to protect the facility?
59. 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.