## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

:

APPLICATION OF CELLCO : DOCKET NO. 495A

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 5151 PARK AVENUE IN

FAIRFIELD, CONNECTICUT : MARCH 24, 2022

# SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13 TO CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES

On March 17, 2022, Cellco Partnership d/b/a Verizon Wireless ("Cellco") responded to Pre-Hearing Interrogatories from the Siting Council, relating to Docket No. 495A. Below is Cellco's Supplemental Response to Interrogatory No. 13.

#### Question No. 13

Referring to the Motion to Reopen Visibility Assessment, were any photographs taken from the area marked as seasonal visibility along Autumn Ridge Road and/or Shadybrook Road? If yes, submit. If not, describe the visibility of the tower from this area.

#### Response

As seen in Exhibit 4 of the Motion to Reopen, the leaves were on the deciduous trees at the time of the balloon float and field reconnaissance for the proposed Bell Tower. No photos were taken on Autumn Ridge or Shadybrook Roads at that time as the balloon was not visible above or through the trees in a leaf-on setting. A small portion of Autumn Ridge and Shadybrook Roads are predicted to have seasonal visibility of the proposed Bell Tower. The proposed Bell Tower will likely be visible through the trees in leaf-off conditions in areas where 24460317-v1

the existing lights and infrastructure associated with the SHU athletic field are currently visible.

#### **Supplemental Response**

On March 22, 2022, three (3) additional photographs were taken from the northerly portion of Autumn Ridge Road looking back toward the SHU campus in the direction of the proposed Bell Tower. The new photo locations are adjacent to the residences at 344 Autumn Ridge Road and 310 Autumn Ridge Road. A Photo Log and copies of the photographs taken from Autumn Ridge Road are attached.

As shown on the Photo Log aerial map, significant areas of mature trees (approximately 50-70 feet in height) exist between the residences on the east side of Autumn Ridge Road and the SHU campus. These blocks of mature trees are located, in part, on the residential lots along Autumn Drive, on the Fairchild Wheeler Golf Course and along the western edge of the SHU campus; the blocks are bisected by two narrow fairways on the golf course.

As depicted in several of the photographs included in the original Visual Assessment & Photo-Simulations materials (Exhibit 4 of the Motion to Reopen; Photo nos. 20-22) during "leafon" conditions, the mature trees in this area provide a substantial, and in most cases, a complete visual screen of buildings and structures on the SHU campus. When the leaves are off the deciduous trees, as depicted in the attached photographs, portions of the existing buildings and structures along the western edge of the SHU campus may be visible through the trees (providing limited, seasonal views). In addition, there is a fairly substantial grade change (ground elevations rise approximately 70-80 feet) between the homes along Autumn Ridge Road and the SHU campus. The proposed Bell Tower structure itself is located approximately 380 feet east of SHU's western property line and over 1,160 feet from the nearest residential property line along Autumn Ridge Road. Based on all of these factors, we do not believe that the proposed Bell Tower will have an adverse visual impact on these residences.

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of March, 2022, a copy of the foregoing was sent, via electronic mail, to:

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