

KENNETH C. BALDWIN

One State Street
Hartford, CT 06103
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts
and New York

February 20, 2025

Via Federal Express and Electronic Mail

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

Re: **Petition No. 1440A – Petition of Cellco Partnership d/b/a Verizon Wireless for a Declaratory Ruling on the Need to Obtain a Siting Council Certificate for the Installation of a Wireless Telecommunications Facility at 115 Peat Meadow Road in New Haven, 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 related to Petition No. 1440A. 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

31525409-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF CELLCO PARTNERSHIP D/B/A	:	PETITION NO. 1440A
VERIZON WIRELESS FOR A DECLARATORY	:	
RULING ON THE NEED TO OBTAIN A SITING	:	
COUNCIL CERTIFICATE FOR THE	:	
INSTALLATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 115	:	
PEAT MEADOW ROAD, NEW HAVEN,	:	
CONNECTICUT	:	FEBRUARY 20, 2025

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL INTERROGATORIES

On February 3, 2025, the Connecticut Siting Council (“Council”) issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Petition No. 1440A. Below are the Petitioner’s responses.

Notice

Question No. 1

Referencing Petition page 4 and Attachment 8, has the City of New Haven, Town of East Haven and/or any abutting property owners provided comments to Cellco Partnership d/b/a Verizon Wireless (Cellco) since the amended Petition filing? If so, please summarize the comments.

Response

No comments were received from any municipal officials or abutters.

Approved Facility

Question No. 2

When did construction commence on the approved facility since the Council’s issuance of the Declaratory Ruling in Petition No. 1440?

Response

Construction of the facility approved in Petition No. 1440 commenced in November of 2023.

Question No. 3

What portions of the approved facility construction have been completed to date?

Response

Before stopping construction of the approved facility, at the request of the landowner, Celco installed the concrete equipment pad, underground utility conduit, the equipment canopy, the H-frame electric meter bank, two equipment cabinets and the compound fence.

Question No. 4

Are any changes required to any construction of the approved facility that has been completed to date to accommodate the property owner's request for relocation? Explain.

Response

Yes. To accommodate the landowner's demands, Celco will need to remove the compound fence and the equipment canopy, remove a portion of the larger equipment pad, and re-locate and extend some of the underground electrical conduit.

Proposed Amendment

Question No. 5

What are the estimated costs of the proposed amended facility compared to the costs of the approved facility?

Response

The cost for the original project improvements was estimated at \$340,000. Celco expects to spend an additional \$45,000 to make the facility modifications described in Petition No. 1440A.

Question No. 6

The approved facility lease area was depicted as 21' X 17' on the Petition 1440 Sheet C-2, Partial Site Plan. The amended facility lease area is depicted as 8' X 7' on the Petition 1440A Sheet C-1, Site Plan. Explain.

Response

The property owner asked Cellco to move its equipment cabinets so that they are closer to the billboard sign support pole and to remove the compound fence, equipment canopy and other site improvement. After making these modifications, Cellco no longer needed the larger leased area.

Question No. 7

Referencing amended Petition p. 2, what concerns from the property owner required the shifting of Cellco's equipment and removal of the fence?

Response

The property owner was very concerned that the location of the Cellco's equipment and related site improvements would obstruct views into the car dealership's lot from Forbes Avenue and thereby, impact business operations. The changes to the ground-based improvements discussed in Petition No. 1440A were designed to reduce, to the extent possible, the visual obstructions that the landowner was concerned about.

Question No. 8

Referencing Petition Attachment 2, Sheet C-1, what does the circle within the access road to the northwest of the proposed catch basin represent?

Response

This is a steel bollard, which will remain after construction is completed to restrict post construction vehicle access to the storm drain area.

Question No. 9

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

Response

Cellco's radio equipment and backup batteries will be maintained within secure (locked) cabinets. These cabinets also maintain silent intrusion alarms which are monitored on a 24/7 basis in case someone tries tamper with or otherwise damage Cellco's equipment.

Question No. 10

Would bollards be installed to protect equipment from vehicles?

Response

No. Cellco does not believe that bollards are needed given the proposed separation of the equipment from the nearest access point for any vehicle accessing the facility.

Question No. 11

The amended Petition construction drawings reference the removal of the approved ice canopy, would another be installed to fit the new concrete pad?

Response

No. Cellco will not be installing a new equipment canopy.

Question No. 12

The Site Schematic as shown in Attachment 1 of the amended Petition shows the access road to the proposed facility coming in from the west of the facility, however Sheet C-1 of the construction drawings shows the access road coming in from the north of the facility. Please clarify.

Response

The access and utility connection to the equipment cabinets near the base of the billboard support pole will extend from the north as shown on Sheet C-1 of the revised project plans. The

Site Schematic showing utilities extending to the billboard from the west is incorrect.

Question No. 13

Referencing amended Petition Sheet RF-1, Image 2, a 46-foot pole extension is shown while the rest of the Petition references a 42 foot pole extension. Please clarify.

Response

The reference to a 46-foot pole extension on Sheet RF-1, Image 2 is an error. The actual proposed pole extension is 42 feet.

Question No. 14

Referencing amended Petition Sheet, A-2, the extension monopole is 42 feet long and its top is 69 feet above ground level (AGL). It also states that the top of the existing billboard pole is 24 feet AGL. This would equal a total of 66 feet. Please clarify.

Response

The top of the existing billboard support pole is 24 feet AGL, however there are existing 3-foot-high wide flange (WF) steel beams on top of the existing pole. The top of the proposed pole dimension is derived from adding 24 feet (existing pole) plus 3 feet (existing WF steel beams) plus 42 feet (proposed pole extension) for a total of 69 feet AGL.

Question No. 15

Referencing amended Petition Sheet C-1, would the tree shown along the interconnection need to be removed or trimmed?

Response

No trees will need to be removed or trimmed to complete the proposed facility improvements.

Question No. 16

Referencing amended Petition Sheet C-2, is the preliminary design of the Project at least

50 percent complete? If not, would construction comply with the Connecticut Soil Erosion and Sediment Control Guidelines and Connecticut Stormwater Quality Manual, effective March 30, 2024?

Response

Cellco has completed approximately 50% of the proposed work but still needs to remove a portion of the equipment slab and re-route the electrical conduit around the modified concrete slab. Cellco will install necessary soil erosion and sediment controls to avoid soil erosion control issues that may be related to these remaining improvements.

Question No. 17

Provide the distance of the new riser pole from the existing utility pole.

Response

The distance is approximately 47.5 feet.

Question No. 18

Provide the distance of the equipment pad from the existing utility pole and the riser pole.

Response

The distance between the existing utility pole and the equipment pad is approximately 428.5 feet. The distance between the riser pole and equipment pad is approximately 381 feet.

Question No. 19

Provide the distance of the underground conduit between the riser pole and the H-frame.

Response

The distance of underground conduit between the riser pole and the H-frame is approximately 14.5 feet.

Question No. 20

What limitations, if any, would the proposed facility design create for any future

upgrades? Explain.

Response

No limitations are anticipated.

Question No. 21

Could the construction or operation of the amended facility impact or interfere with any existing utilities or infrastructure within the project area? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

Response

No.

Question No. 22

When does Cellco intend to begin construction if approved by the Council? Provide construction workdays/hours and the anticipated duration of construction.

Response

Cellco would resume construction of the modified facility immediately following the Council's approval. Construction would take place Monday-Saturday between 7:30 AM and 5:30 PM.