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**VIA FEDERAL EXPRESS AND
ELECTRONIC MAIL**

Melanie.bachman@ct.gov
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Ms. Melanie A. Bachman, Esq., Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1467.

Dear Attorney Bachman:

This office represents Barrett Outdoor Communications, Inc. (“Petitioner”). On behalf of Petitioner, I have enclosed one original and fifteen hardcopies of its partial response to the first set of interrogatories issued by the Connecticut Siting Council (“Council”). Pursuant to an extension request granted by the Council, dated December 14, 2021, Petitioner will provide the remainder of the responses on or before January 14, 2022.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

Enclosures

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION OF BARRETT OUTDOOR COMMUNICATIONS, INC. FOR A DECLARATORY RULING THAT A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS NOT REQUIRED FOR THE RELOCATION OF A TELECOMMUNICATIONS FACILITY	:	PETITION NO. 1467
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	:	December 15, 2021

PETITIONER’S RESPONSES TO THE FIRST SET OF INTERROGATORIES BY THE CONNECTICUT SITING COUNCIL

Barrett Outdoor Communications, Inc. (“Petitioner”) respectfully submits the following responses and non-privileged documentation to the First Set of Interrogatories issued by the Connecticut Siting Council (“Council”) in connection with the above-captioned matter.

General

1. *What is, or was at the time of approval, the principal use of the structure that currently hosts the non-tower antenna arrays at 28 Sidney Street?*

The current principal use of the structure is to support one or more antennas for receiving or sending radio frequency signals. At the time of initial approval, the principal use of the structure was a billboard.

2. *What entity approved the existing Cellco Partnership d/b/a Verizon Wireless (Verizon) and T-Mobile Northeast LLC (T-Mobile) non-tower antenna array installations on the structure at 28 Sidney Street?*

The Town of Stratford (“Stratford”) Zoning Commission approved the collocation of the antenna installations of Cellco Partnership d.b.a. Bell Atlantic NYNEX Mobile (now Cellco Partnership d.b.a. Verizon Wireless) (“Verizon”) and T-Mobile Northeast LLC, a subsidiary of T-Mobile USA Inc. d.b.a. T-Mobile (“T-Mobile”).

3. *Has the principal use of the structure at 28 Sidney Street changed over its useful life? When did the principal use of the structure change to a “wireless telecommunications facility,” as described in the petition?*

Yes. Please see responses to Request Nos. 1 and 2. The existing structure previously served as a billboard, as approved by the Stratford Zoning Commission in 1979. In 1996, the Stratford Zoning Commission approved the collocation of a wireless installation by Verizon. In 1997, a predecessor of T-Mobile, Omnipoint

Communications, obtained approval to install its antennas on the billboard structure. In 2008, Metro PCS (since acquired by T-Mobile) received approval to collocate its antenna installation on the billboard structure.

In 2018, the Stratford Zoning Commission approved the relocation of the billboard in connection with the redevelopment of the immediate area known as the Dock Shopping Center. The Outdoor Advertising permit for this location was surrendered to the Department of Transportation and, since 2018, the existing structure has not displayed any advertising signage and its principal use is to support the antenna installations of Verizon and T-Mobile.

As a result of these developments, the existing structure now falls within the definition of a “tower” under § 16-50j-2a(30) of the Regulations of Connecticut State Agencies. The existing structure: (a) has a height greater than its diameter; (2) is high relative to its surroundings; and (3) is now used principally to support one or more antennas for receiving or sending radio frequency signals.

4. *Who owns the existing structure at 28 Sidney Street? Who owns the host parcel?*

Petitioner owns the tower. UB Stratford I, LLC, a subsidiary of Urdstadt Biddle Properties, Inc. (“UB”), now owns the host parcel.

5. *Please provide a photograph of the existing structure at 28 Sidney Street.*

Photographs of the tower are appended hereto as Attachment 1.

6. *What is the height of the existing structure at 28 Sidney Street?*

The tower structure is approximately 63.5 feet above ground level (“AGL”), with antennas extending to approximately 72.5 feet AGL.

7. *What is the ground elevation at the location of the existing structure at 28 Sidney Street?*

Approximately eighteen feet AMSL.

8. *Please explain why the existing structure at 28 Sidney Street is characterized in the petition as “an existing wireless telecommunications facility” and why the proposed telecommunications facility at 200 East Main Street Rear is characterized in the petition as “the Relocated Facility.”*

Please see response to Request No. 3. The location of the existing tower interferes with the redevelopment plan approved by Stratford and, therefore, requires the removal and relocation of the existing tower. The host parcel will serve as an important component of the redevelopment, presently contemplated as restaurant space. The height of the buildings associated with the redevelopment necessitates an extension in the height of the tower even if it were to remain in its present location.

9. *Referencing page 2 of the Petition, please provide details of the redevelopment plan and explain why the existing structure must be removed from 28 Sidney Street.*

A plan depicting the approved redevelopment of the immediate area is appended hereto as Attachment 2. The redevelopment plan includes: (1) development of a multi-story self-storage facility and two standalone restaurants; (2) relocation of the billboard and demolition of the existing structure; and (3) significant landscaping along the former Sidney Street.

Because Stratford considers this area as a gateway to the Town, UB worked with Stratford to implement a redevelopment plan, which included various changes to the zoning regulations. The contemplated replacement of the existing tower maximizes the commercial use of the UB properties while continuing to recognize the critical nature of wireless communication in I-95 corridor and surroundings. It should be noted that implementation of the redevelopment plan is well under way; the multi-story storage facility immediately to the northeast has been constructed. Please also see responses to Request Nos. 3, 5 and 8.

10. *Why did Barrett Outdoor Communications, Inc. (BOC or Petitioner) not apply to the Town of Stratford for a new communications tower for its own use?*

The tower is now used principally to support Verizon and T-Mobile, both of which operate one or more antennas for receiving or sending radio frequency signals as defined in § 16-50j-2a(30). The whip antenna proposed by Petitioner would be used for emergency communications. The whip antenna as shown on the plans may be installed by Petition on behalf of the Connecticut – Rhode Island Red Cross Central Connecticut Territory for disaster communications. Petitioner included the whip antenna in this filing for transparency and in furtherance of the State’s public policy to avoid the unnecessary proliferation of towers as articulated in General Statutes § 16-50aa.

11. *Has BOC constructed, maintained and operated any wireless telecommunications facilities? If so, what type and where?*

Since 1996, Petitioner has hosted wireless installations on billboard structures. Currently, Petitioner hosts wireless providers on nine sites located in New Haven, Stratford, Waterbury and West Haven. Petitioner is intimately involved in the design of the wireless installations and maintenance of the underlying structures. Petitioner has approximately sixty years of experienced with the structural design and installation of billboards, including billboards situated on 115 foot steel columns. Petitioner also owns billboards situated on or near rail lines and Petitioner’s personnel receive railroad annual safety training.

12. *Does Verizon currently maintain a non-tower antenna array installation at the 67.9-foot level of the structure at 28 Sidney Street consistent with the data in the Technical Report and the Council's Statewide Comprehensive Database? If so, when was the antenna installation approved, at what height, and with what conditions, if any?*

Verizon maintains an antenna installation at 28 Sidney Street with antennas at a centerline height of approximately sixty-seven feet AGL. The original approval dates back to 1996 by Stratford. See response to Request Nos. 3, 8 and 10. The available records do not include any conditions other than a building permit timeframe.

13. *Please submit a copy of the original approval for Verizon's non-tower antenna array installation on the structure at 28 Sidney Street.*

Petitioner has appended hereto as Attachment 3 the original approval for Verizon's installation at 28 Sidney Street. Stratford has represented that it does not have any other records and Verizon has not located any additional documentation.

14. *Does T-Mobile currently maintain a non-tower antenna array installation at the 60-foot level of the structure at 28 Sidney Street consistent with the data in the Technical Report and the Council's Statewide Comprehensive Database? If so, when was the antenna installation approved, at what height and with what conditions, if any?*

T-Mobile maintains an antenna installation at 28 Sidney Street with a centerline of approximately sixty feet AGL. Petitioner was not able to locate the original approval. Please see response to Request Nos. 3, 8, 10 and 12 concerning the history of the tower.

15. *Please submit a copy of the original approval for T-Mobile's non-tower antenna array installation on the structure at 28 Sidney Street.*

Please see response to Request No. 14.

16. *Page 8 of the Petition states BOC sent notice in accordance with Regulations of Connecticut State Agencies §16-50j-40. Please explain how the proposed facility is required by statute to be approved by a declaratory ruling in lieu of a certificate under CGS §16-50k or how the subject of this petition is not a "facility," as defined under CGS §16-50i(a)(6).*

Please see response to Request Nos. 3, 8, 10 and 12. The existing structure is a "tower" pursuant to § 16-50j-2a(30). Although not a statutory mandate, the Council has considered and approved relocations and extensions via declaratory ruling based on the Council's determination that those proposals did not have a "substantial adverse environmental effect in the state" in accordance with General Statutes § 16-50k(a). See Petition Numbers 455A, 518, 593, 1346 and 1435.

The proposed relocation is ideally suited for the continued use as a tower because: (a) it is a short distance from the existing tower; (b) it is in a retail commercial district; (c) it is adjacent to a retail shopping center; (d) it is adjacent to Interstate 95 and the

associated bridge apparatus over the Housatonic River; (e) it is adjacent to existing infrastructure associated with the Metro North rail corridor, specifically a bridge catenary structure; (f) there are no wetlands, coastal resources or other environmental concerns as the area is well developed; and (g) the host property is more than 1000 feet from any single family residence, including the residential areas to the north and west. Please see generally the Petition.

These existing conditions, along with the historical presence of the billboard and now existing tower, support a determination from the Council that the tower relocation and extension would not have a “substantial adverse environmental effect in the state” Such a determination is consistent with prior treatment of relocations and extensions via declaratory ruling.

17. *When BOC met with the Town of Stratford and the City of Milford to discuss the Technical Report, did BOC offer to hold a public information meeting in either or both municipalities?*

Petitioner offered to hold a public information meeting in either or both municipalities. Both municipalities declined and ultimately submitted letters in support of the proposed relocation. See Attachment 4 to the Petition.

18. *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?*

Petitioner received certified mail receipts from all abutting property owners.

19. *Pursuant to CGS §16-50o, please submit a copy of the lease for the proposed site.*

Petitioner has a telecommunications easement, as amended, for the proposed site. The easement and its amendment are appended hereto as Attachment 4.

20. *How is the cost of the tower construction recovered?*

From the revenue generated from the collocation leases with the wireless carriers.

21. *Estimate the total cost of the proposed project. Break down the total cost into categories that the Petitioner deems appropriate.*

The estimated cost is as follows:

Foundation	\$45,000
Tower	\$65,000
Site Development	\$115,000
Utility Installation	\$75,000
Total	\$300,000

Site Search

22. *Approximately when was the search ring established for the proposed facility?*

Pending.

23. *Were other potential sites considered for the proposed facility? If so, please identify the other potential sites and why they were rejected.*

Petitioner considered other locations proximate to the redevelopment and the existing tower. This consideration of alternatives was constrained by the following: (a) the existing coverage objectives served by the existing tower; (b) the redevelopment of the Dock Shopping Center; (c) the nature of the surrounding land uses or properties; and (d) property owner interest in hosting the relocated facility.

200 East Main Street (Stop & Shop). The property owner and Stop & Shop rejected other locations on the host property for the relocated facility.

250 East Main Street (Ashcroft Inc.). Vacant land on this property is located in a flood plain.

350 Barnum Avenue (Home Depot/Walmart). This property is a capped superfund site.

955 Ferry Boulevard (Edge Fitness). This property is located closer to a residential area.

This response may be supplemented by Verizon, which is pending.

24. *Were any of the following existing structures, or combination of existing structures, including, but not limited to, building rooftops, investigated for the provision of wireless services:*

- a. *Any of the smokestacks located in the Town of Stratford or City of Milford that are visible in Photos 11-12; 26-27; 32-33; and 35-37 of the Visibility Analysis;*
 - b. *Any of the electric transmission line structures, or planned future replacement electric transmission line structures along the UI ROW, some of which are visible in Photo 27 of the Visibility Analysis; and*
 - c. *The billboard structure visible in Photo 34 of the Visibility Analysis?*
- a. The smokestacks are part of a power plant that previously belonged to NRG Energy. The new owner has not been receptive to potential leases at this time.**
- b. Pending.**
- c. Pending.**

25. *Are any other locations on the host parcel available for development of the facility site? For example, could the facility site be moved adjacent to the existing garage or another location on the host parcel?*

The Petitioner explored the possibility of these locations on the host parcel. The property owner and Stop & Shop rejected them. See response to Request No. 23.

Site/tower

26. *Provide a revised property line map that clearly shows the boundaries of the host parcel(s).*

Please see a property line map appended hereto as Attachment 5.

27. *What is the distance and direction of the proposed facility site from the existing structure at 28 Sidney Street?*

The proposed monopole is approximately 1,250 feet northeast of the existing tower.

28. *Referencing Tab 1, Sheets C-1 and C-2, the proposed final grade at the location of the proposed facility is approximately 12.3 feet amsl. What is the existing ground elevation at the location of the proposed facility?*

The existing grade at the location of the proposed facility is approximately 12.3 feet AMSL (NAD 83).

29. *Who would own, operate and maintain the proposed facility?*

Petitioner.

30. *Which entity (BOC or Verizon) is driving the required minimum height of the proposed facility?*

Verizon. Verizon may further supplement this response.

31. *Footnote 3 on page 3 of the petition states, "AT&T has expressed an interest in locating its antennas on the Relocated Facility with a centerline of **131 feet AGL**." (Emphasis added). Would AT&T's co-location on the proposed facility require an extension in height? Explain.*

Yes.

32. *Page 3 of the Petition states, "Barrett would install an omnidirectional whip antenna off the top of the monopole, which would be base mounted at **130 feet AGL**." (Emphasis added). Would BOC's antenna installation on the proposed facility require an extension in height? Explain.*

No. Please see response to Request No. 10.

33. *If AT&T seeks to co-locate antennas on the proposed facility at the 131-foot level, would BOC's base-mounted whip antenna installed at the 130-foot level create any interference with or other impediment to AT&T's installation? Explain.*

No. Petitioner anticipates that the whip antenna location and mount would be designed to minimize potential interference with a wireless carrier located at the top of the tower.

34. *Has the Town of Stratford or City of Milford expressed an interest in co-locating emergency services antennas?*

Neither municipality has expressed an interest in collocating their emergency services antennas on the relocated facility at this time.

35. *What is the distance and direction of the closest residence from the existing structure at 28 Sidney Street? What is the distance and direction of the closest residence from the proposed facility?*

The nearest residence to the 28 Sidney Street tower is at 858 Housatonic Avenue, approximately 655 feet southeast of the existing facility. The nearest residence to the proposed facility is at 153 Peck Street, approximately 1,155 feet northeast of the proposed facility.

36. *What is the distance to the CT Metro North Commuter Railroad (MNRR) property line from the proposed facility?*

The proposed facility fence line will be approximately six to eleven feet from the MNRR property line. The proposed monopole will be approximately 27'-7" from the MNRR property line.

37. *What is the distance and direction to the closest UI electric transmission line structure from the proposed facility?*

The proposed facility will be approximately 163 feet east/northeast from UI Pole 861ss and approximately 163 feet west/northwest from UI pole 860s.

38. *How does the height of the proposed facility compare to the height of the existing MNRR catenary structures and UI electric transmission line structures?*

The top of the proposed monopole is approximately 137.3 feet AMSL, with design capacity for a future 20 foot extension (157.3 feet AMSL). The top of UI pole 861ss is approximately 138.1 feet AMSL. See Petition, Attachment 1.1, Sheet C-2. The top of the catenary is approximately 73.37 feet AMSL.

39. *Would the proposed monopole have a galvanized gray finish or a different color/finish? Explain.*

The monopole would utilize a galvanized gray finish. This finish is typically more durable than other treatments and would blend in with the surrounding infrastructure.

40. *Provide the approximate widths of the proposed tower at the base and at the top.*

The proposed monopole would be approximately five feet diameter at the base and two feet diameter at the top (125 feet AGL).

41. *Could the tower be designed with a yield point to ensure that the tower setback radius remains within the boundaries of the subject property? How would BOC mitigate any potential impacts or damage to the adjacent properties and rights-of-way?*

Yes. The yield point would be designed to remain within the boundaries of the Property.

42. *Could the proposed tower be relocated adjacent to the existing garage on the parcel or along the west fence line adjacent to Stop and Shop to provide for a larger setback from the rail corridor and electric transmission line?*

No. Please see response to Request Nos. 23 and 25.

43. *Referencing Tab 1 of the Petition, Sheet C-1, provide a drawing depicting the (Multi-Meter Mod, CB, ATS, Telco & BOC) equipment area. Also include T-Mobile's radio equipment if it is part of the proposed project.*

The utility service frame would be placed on the elevated equipment platform. The final configuration cannot be determined at this time, as it will be subject to evaluation by UI. T-Mobile is not a part of the proposed project at this time.

44. *Referencing Tab 1 of the Petition, Sheet C-2, please depict T-Mobile's tower mounted equipment (e.g. antennas, tower mounts, and RRHs) if it is part of the proposed project.*

T-Mobile is not a part of the proposed project at this time.

45. *Referring to Site Plan C-2, what is the "THEORETICAL RAILROAD EMBANKMENT LINE?"*

The theoretical railroad embankment line has been relabeled 'OSHA 2:1 embankment profile'. Refer to revised drawing 1/C-2. The OSHA 2:1 embankment profile line is a 2:1 slope representing the boundary of an excavation and shoring zone, whereby only vertical shoring shall be permitted for excavation within the zone. Shoring shall comply with OSHA standards, as required by the American Railway Engineering and Maintenance-of-Way Association ("AREMA").

46. *Referring to Site Plan C-2, what is the “THEORETICAL UNDERGROUND TRACK DISTURBANCE LINE?”*

The theoretical underground track disturbance line has been relabeled Cooper E80 Line. Refer to revised drawing 1/C-2. The Cooper E80 line is a 1.5:1 slope representing the boundary of an excavation and shoring zone, whereby shoring shall be designed for Railroad live load surcharge, in addition to OSHA standard loads for excavation, as required by the AREMA.

47. *Maps included in the Wetlands Inspection Report, under Tab 7, show two proposed utility interconnections, one going under Interstate 95 to a parking area at the northeast corner of the shopping center, and the other going west to Route 110. What are each of the proposed utility interconnections to be used for?*

The utility interconnection depicted west of the proposed facility is for the telecommunications fiber and the utility interconnection east of the proposed facility is for the electrical power interconnection. See Petition, Attachment 1.1, Proposed Compound Plan, Sheet No. C-1.

48. *Would any blasting be required to develop the site? How will the foundation be installed? How old is the existing underground RCP Storm Drain? How will the Petitioner ensure vibrations from excavation and foundation installation do not damage the storm drain?*

Petitioner would not utilize blasting at the site. Based on a Geotechnical Report, the recommended foundation design is a deep foundation system, *i.e.*, drilled caisson. The drilled caisson would be end-bearing in bedrock and installed with a permanent steel casing. The steel casing is intended to protect surrounding features such as the storm drain and satisfy the E80 shoring requirement.

49. *Would the tower be designed for EIA/TIA-222 structural standards version G, H, or both?*

The tower will be designed to TIA-222-H “Structural Standards for Antenna Supporting Structures, Antennas and Small Wind Turbine Support Structures.”

50. *What type of antenna mount will be used for the proposed antennas? What is the structural design standard applicable to such antenna mount?*

Antennas would be mounted to heavy duty platforms designed in accordance with TIA standards. The specific antenna mounts would be determined prior to construction.

Coverage/Capacity

51. *Does the Petitioner intend to include a request for approval of T-Mobile's antenna installation at the proposed facility? If so, provide existing and "existing plus proposed" coverage maps for the proposed facility and for the existing structure at 28 Sidney Street.*

T-Mobile is not a part of the proposed project at this time.

52. *Referencing Tab 3 of the Petition, Verizon coverage maps, does "Stratford S CT" represent the existing structure at 28 Sidney Street, and "Stratford S Relo CT" represent the proposed facility?*

Pending.

53. *Referencing Tab 3 of the Petition, Verizon coverage maps, do these coverage maps depict only existing service including from the existing structure at 28 Sidney Street, or do they depict existing plus proposed site coverage? If these plots are existing coverage only, provide similar plots that are existing plus proposed, or vice versa for each of the frequency bands.*

Pending.

54. *Identify distances and directions to the adjacent sites with which the proposed facility would hand off signals. Include addresses, tower types, and Verizon's (and T-Mobile's, if applicable), antenna centerline heights at these sites.*

Pending.

55. *Referencing page 3 and Tab 15 of the Petition, would Barrett's omnidirectional whip antenna on the top of the facility affect the radio frequency power density, or is that antenna receive-only? If it would affect power density, provide a revised Tab 15 to include the effects of the whip antenna. Also include T-Mobile in the radio frequency power density table if applicable.*

Please see response to Request No. 10. Additional work is necessary to finalize the design of the whip antenna including radio frequencies.

56. *Would the proposed site be needed for coverage, capacity, or both for Verizon (and T-Mobile, if applicable)? Explain.*

Pending.

57. *Are all frequencies (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3.55 GHz) used to transmit voice and data for Verizon (and T-Mobile, if applicable)?*

Pending.

58. *What is the specific purpose of the 700 MHz and 2100 MHz systems for Verizon (and T-Mobile, if applicable)?*

Pending.

59. *What is the lowest height at which Verizon's antennas could achieve its wireless service objectives from the proposed site? If applicable, what is the lowest height at which T-Mobile's antennas could achieve its wireless service objectives from the proposed site?*

Pending.

60. *Could the required coverage and capacity needs for Verizon (and T-Mobile, if applicable) be met by a series of small cell facilities or a distributed antenna system rather than the proposed macro tower facility?*

Pending.

61. *What is the signal strength for which Verizon (and T-Mobile, if applicable) designs its system? For in-vehicle coverage? For in-building coverage?*

Pending.

62. *What is the existing signal strength within the area Verizon (and T-Mobile, if applicable) is seeking to cover from this site?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

63. *What is Verizon's (and T-Mobile's, if applicable) existing coverage footprint from the structure at 28 Sidney Street and Verizon's existing and predicted coverage footprint from the proposed site (in square miles), at each frequency that would be installed?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

64. *What was the approximate size of Verizon's (and T-Mobile's, if applicable) search area in the vicinity of the proposed site?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

65. *What nearby wireless facilities (or sectors) are nearing capacity limits for Verizon (and T-Mobile, if applicable)? At what frequencies? Please include a projected exhaustion date for each of these sectors. Would the deployment of the proposed facility be sufficient to address these capacity concerns or would an additional facility be required in the near term to off-load traffic?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

66. *Once the proposed site is on-line and providing capacity relief to adjacent sites, what would be the effective service area for the 700 MHz frequency for Verizon (and T-Mobile, if applicable)? Would parts of overlapping service be handled by the existing sites, thus lessening the effective service area of the proposed site? Please explain.*

Pending as to Verizon. T-Mobile is not included in this proposal at this time.

67. *Would flush-mounted antennas provide the required coverage for Verizon (and T-Mobile, if applicable)? Would the flush-mount configuration result in reduced coverage and/or necessitate greater antenna height with multiple levels of antennas? Explain.*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

Backup power

68. *The Technical Report states the facility “would also include a liquid propane fueled emergency standby power generator and two 1,000 gallon liquid propane tanks on concrete pads located at the eastern end of the compound.” Is this still proposed? If so, please identify the location of the generator and the fuel tanks on the site plans.*

No.

69. *How many kilowatts is the proposed propane generator? Is the proposed propane generator intended for shared use by other carriers that may locate on the facility or is it reserved for BOC's use? If it is reserved for BOC's use, is there an emergency backup generator proposed for Verizon? If so, what is the fuel source for the backup generator(s)?*

The Petition does not propose a generator.

70. *Would the backup generator(s) have containment measures to protect against fluid leakage?*

Please see response to Request Nos. 68 and 69.

71. *What would be the respective run times for the generator(s) before they would need to be refueled, assuming it is running at full load under normal conditions?*

Please see response to Request Nos. 68 and 69.

72. *Could a backup 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?*

Please see response to Request Nos. 68 and 69.

73. *Would a battery backup (if applicable) be used for Verizon (and T-Mobile, if applicable) to provide uninterrupted power and prevent a reboot condition? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

74. *Would the backup generator(s) run periodically for maintenance purposes? If so, at what frequency and duration? Would this be scheduled for daytime hours?*

Please see response to Request Nos. 68 and 69.

75. *Would the backup generator(s) be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?*

Please see response to Request Nos. 68 and 69.

Public Safety

76. *Would Verizon's (and T-Mobile's, if applicable) proposed co-location(s) support text-to-911 service? Is additional equipment required for this purpose?*

Pending as to Verizon. T-Mobile is not a part of the proposed project at this time.

77. *Would T-Mobile's antennas comply with federal E911 requirements, if T-Mobile is part of the proposed project?*

T-Mobile is not a part of the proposed project at this time.

78. *Would Verizon's (and T-Mobile's, if applicable) installation(s) comply with the intent of the Warning, Alert and Response Network Act of 2006?*

Pending as to Verizon. T-Mobile is not included in this proposal at this time.

79. *Would the proposed facility comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?*

Noise from the proposed facility would be minimal. The surrounding area is fully developed with commercial properties that generate a high volume of traffic. Interstate 95 is immediately to the southeast, and active rail lines run along the northern property boundary. Thus, the ambient noise levels in the area of the site are significant and would qualify as excessive noise under the Connecticut Department of Energy and Environmental Protection (“DEEP”) Noise Regulations. Any incremental noise from the cooling of Verizon’s equipment would be minor.

80. *What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)*

An eight foot high chain-link fence with anti-climb mesh would enclose the compound on all four sides. Gates would be secured with locks.

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

The applicable safety standards and/or codes include:

- a. 2015 International Building Code as amended by the 2018 Connecticut Building Code;**
- b. 2017 National Electric Code (NFPA70);**
- c. 2018 CT State Fire Safety Code;**
- d. TIA-222-4H “Structural Standards for Antenna Supporting Structures, Antennas and Small Wind Turbine Support Structures”; and**
- e. Occupational Safety and Health Administration (OSHA).**

82. *Referencing Tab 11 of the Petition, the Federal Aviation Administration (FAA) issued its Determination of No Hazard for the proposed facility. Would the Petitioner need to provide notice to the FAA for temporary structures such as cranes used during construction?*

Notice is not required for temporary construction activity under the FAA tower licensing requirements.

83. *How could the proposed facility impact access and/or maintenance activities associated with the MNRR and the UI electric transmission line facility? Has BOC consulted with MNRR and UI about the proximity of the proposed facility to the railroad and electric transmission infrastructure?*

The proposed facility is not expected to have any impact on access and/or maintenance activities for MNRR and UI. Petitioner consulted with MNRR and UI and confirmed that the proposed relocated facility satisfies their respective setback requirements.

84. *What are BOC's tentative work hours and days of the week for the proposed project? Would BOC consult with MNRR and UI regarding its final work hours and days of the week for this project?*

Petitioner would consult with Stratford to ensure compliance with all local ordinances. Petitioner anticipates the following schedule: Monday through Friday between 7:30a.m. and 5:30p.m. If weekend hours are required, then Petitioner would adopt a modified schedule of 9:00a.m. to 5:30p.m. Petitioner has consulted and would continue to consult with MNRR and UI concerning the final construction schedule.

85. *Does the westerly interconnection traverse MNRR property? Are there any concerns for subsurface contaminants along this route? Are there any concerns about impacts to the MNRR wall along this route?*

The westerly utilities interconnection would not traverse MNRR property.

A Phase I was performed for the site by a Licensed Environmental Professional with GO Environmental, LLC ("GO"). GO concluded:

"It is the opinion of GO Environmental that the Subject Site easement does not appear to meet the definition of an "Establishment" as defined in Sections 22a-134 through 22a-134e of the Connecticut General Statutes (CGS), as amended by Public Acts 09-235 and 09-3, and therefore would not be subject to the State of Connecticut Transfer Act"

In the unlikely event potential subsurface contaminants are uncovered, Petitioner would retain an environmental firm to sample the material and, if necessary, remove it in accordance with applicable law.

No impact to the MNRR wall along the interconnection route is anticipated as the proposed utilities interconnection does not traverse MNRR property and, at its closest, reaches the toe of the slope of the MNRR embankment and follows the fence line to the proposed relocated facility. The proposed interconnection route lies outside the COOPER E80 line and, accordingly, there are no anticipated adverse impacts to the COOPER E80 line.

86. *Referring to Site Plan C-2, when is the anticipated replacement of the adjacent UI tower? What do the 27 foot and 22 foot radius arcs on the UI tower represent?*

UI replaced the adjacent tower (UI Pole 861ss) slightly north of the proposed monopole location shown on Sheet C-2. The twenty-two and twenty-seven foot dimensions represent the approximate distances from the location on Sheet C-2 to the proposed monopole for the Metro North Power Line Arm and nearest conductor, respectively.

87. *Referring to Site Plan C-2, a 25-foot safety zone from the outside rail is noted on the plan. What is the purpose of the safety zone? What entity defines the safety zone?*

The United States Department of Transportation Federal Railroad Administration (“FRA”) requires a twenty-five foot safety zone from the outer rail. That area cannot be accessed by non-railroad personal unless they have attended the railroad’s safety orientation class and have a safety orientation photo ID and a railroad flagman tasked with providing safety for the personnel inside the safety zone. All safety procedures are developed by the railroad and must comply with FRA requirements.

88. *Is the proposed site located within a FEMA designated special hazard zone?*

No. According to FIRM Panel No. 09001C0453G, effective date 7/8/2013, the eastern end of the subject property is located within a 100-year flood hazard Zone AE (EL 10) associated with the Housatonic River. However, the proposed facility is located within an unshaded Zone X, outside of the 100-year and 500-year flood hazard zones

89. *The Avian Resources Report in Attachment 14 references a gasoline station located on the host parcel. Identify the location of the gasoline station on a map. What is the distance and direction from the proposed facility to the gasoline station?*

The Stop & Shop gasoline station is located approximately 365 feet southwest of the proposed facility (to the northeast fence corner between the boat storage and the gas station landscaping).

90. *How would emergency vehicles be able to access the compound?*

Petitioner would install a KNOX® lock on the access gate to which First responders would have a key.

91. *Referring to Site Plan C-1, what is the purpose of the 3-foot wide winter path?*

The winter path was intended to allow representatives of Verizon and other wireless providers to access the relocated facility during the winter when boats are stored on the property. A revised access assessment now provides for full, year-round vehicular access.

92. *What is the purpose of the elevated platform?*

The property owner required Petitioner to minimize the impact of the relocated facility on boat storage space. Additionally, the property line between MNRR and the host property is about half-way up the embankment. The elevated platform allows the relocated facility effectively to overhang the embankment and minimize impact on the boat storage area.

93. *How would the proposed facility be protected from a train derailment?*

There are no specific means of protecting the proposed facility (or any existing telecommunications facility located near a railroad) from a train derailment.

94. *At what height are the electric transmission line conductors on the UI pole?*

The conductors for Pole 860S range from 63.78 feet AMSL to 127.41 feet AMSL. The conductors for Pole 861S range from 65.68 feet AMSL to 136.97 AMSL.

95. *Are there any regulations and restrictions on the storage of fuels and the employment of backup electrical generation (ex. propane or diesel fueled backup generators) in proximity to the MNRR property and the UI electric transmission line?*

The site is regulated by the National Fire Code; however, the current proposal does not include a propane or diesel fueled backup generator.

96. *Would the proposed lightning rod and grounding system also protect the facility in the event of accidental contact with live electric wires? If not, how would the facility be protected under these circumstances?*

The proposed tower lightning rod and grounding system is designed to provide protection from a lightning strike. There are no specific means of protecting the facility from fallen electric wires.

Environment

97. *Page 11 of the Petition claims there would not likely be any adverse impact to coastal resources associated with the Housatonic River because of the distance of the proposed facility to the nearest resource area. What is the distance of the proposed facility to the nearest resource area? Identify the resource areas.*

The nearest coastal resource area to the proposed facility are tidal wetlands that border on the west bank of the Housatonic River, located approximately 316 feet to the east and identified as Wetland 1 on the Wetland Inspection Map. Please see Petition, Attachment 7 – Coastal Consistency Review.

98. *Explain how the proposed facility is consistent with the Long Island Sound Blue Plan.*

The DEEP Long Island Sound Blue Plan (“Blue Plan”; Ver. 1.2, September 2019) policies are broken into these main components:

- **Ecologically Significant Areas (“ESA”; i.e., rare species habitat, coastal wetlands, marine wildlife habitat, fisheries, shellfish beds, etc.); and**

- **Significant Human Use Areas (“SHUA”;** *i.e.*, culturally significant features, areas of recreational value, areas important to navigation/transportation/infrastructure, fishing, and aquaculture).

Blue Plan policies and standards are established to identify areas and standards that avoid conflicts and impacts and encourage sustainable and compatible development. In general, proposed uses and activities subject to the Long Island Sound Blue Plan are not prohibited outright. Rather, project proponents are encouraged to develop their applications to avoid, minimize, and mitigate conflicts and impacts on Long Island Sound’s natural resources and traditional human uses.

The Coastal Consistency Review (Petition, Attachment 7) generally addresses the applicable policies and standards in the Blue Plan, documenting the proposed facility’s consistency with the associated policies, with no adverse impact to coastal resources.

99. *Referencing Tab 8 of the Petition, Visual Assessment, Table 1, pages 5 and 6, please revise Table 1 to include a column that estimates how much of the tower is visible in each photograph (in feet).*

A table with a column estimating the portions of the facility visible from each photograph is appended hereto as Attachment 6.

100. *Were any stormwater-related drainage calculations or analysis performed? If so, provide the calculations or analysis.*

No. A stormwater analysis is not warranted because there would be no increase in impervious area as a result of the project. Accordingly there is no anticipated change in stormwater volume.

101. *Referencing Tab 1 of the Petition, Sheet C-1, “Site Areas & Volumes of Earthwork,” there would be approximately 95 cubic yards of excavation to be removed from the site. How would the Petitioner dispose of such material?*

A licensed contractor would remove the excavated material or place it back into the excavated area in accordance with applicable law.

102. *What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.*

Use of a stealth tower design is limited by space and height considerations. Use of a flagpole would require additional height to provide sufficient antenna space for multiple carriers. Due to its increased width at lower levels, a monopine would be incompatible with the surrounding MNRR infrastructure. The surroundings include significant utility infrastructure; thus, a monopole design with galvanized finish blends with the surrounding infrastructure better than other designs

103. *Referencing Tab 7 of the Petition, page 2, Coastal Resources Table, “General Resources” are checked in two columns as being both “on-site” and “not applicable.” Explain.*

This is a clerical error, the “Not Applicable” box should not be checked.

104. *Does the proposed site contain any Farmland Soils? If so, what acreage of farmland soils would the facility and associated equipment be located on?*

No.

105. *Please characterize visibility of the proposed facility from the Housatonic River.*

Portions of the monopole are expected to be visible over open water along the Housatonic River, except where obscured by infrastructure and vegetation. Representative views from the banks of the river are depicted in the following photos and associated photo-simulations in Attachment 8 to the Petition: #15, #16 #19, #23, #35, #36, #37.

106. *What is the potential for bird nesting at the proposed facility and how would BOC manage this?*

Due to the proposed facility’s proximity to the Housatonic River and Long Island Sound, there is the potential for antenna platforms to be used for bird nesting, particularly by ospreys. Should ospreys (or other avian species) establish a nest on the monopole, any antenna maintenance activities would need to comply with the federal Migratory Bird Treaty Act (“MBTA”) regulations while the nest is active, as defined by the MBTA. Depending upon the species, the time of year and the proposed work activities, such activities may need to be delayed until the nest is no longer active.

Respectfully submitted by,

BARRETT OUTDOOR COMMUNICATIONS, INC.



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ATTACHMENT 1

(Photographs of Tower)

ATTACHMENT 2

(Redevelopment Layout Plan with Location of Existing Tower)

ATTACHMENT 3

(Verizon Approval by Stratford)

ATTACHMENT 4

(Easement and Amendment)

ATTACHMENT 5
(Property Line Map)

ATTACHMENT 6

(Estimated Portions of the Facility Visible)