



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

www.ct.gov/csc

VIA ELECTRONIC MAIL

November 10, 2021

Jesse A. Langer, Esq.
Updike, Kelly & Spellacy, P.C.
One Century Tower
265 Church Street, 10th Floor
New Haven, CT 06510
jlanger@uks.com

RE: **PETITION NO. 1467** – Barrett Outdoor Communications, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed relocation of existing non-tower antenna arrays from a non-jurisdictional billboard located at 28 Sidney Street to a new telecommunications facility proposed to be constructed, maintained and operated at 200 East Main Street, Rear, Stratford, Connecticut.

Dear Attorney Langer:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 1, 2021.

Please submit an original and 15 copies to the Council's office and an electronic copy to 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 December 1, 2021 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

MB/MP

Petition No. 1467
Barrett Outdoor Communications, Inc.
Interrogatories – Set One
November 10, 2021

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?
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?
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?
4. Who owns the existing structure at 28 Sidney Street? Who owns the host parcel?
5. Please provide a photograph of the existing structure at 28 Sidney Street.
6. What is the height of the existing structure at 28 Sidney Street?
7. What is the ground elevation at the location of the existing structure at 28 Sidney Street?
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.”
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.
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?
11. Has BOC constructed, maintained and operated any wireless telecommunications facilities? If so, what type and where?
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?

13. Please submit a copy of the original approval for Verizon's non-tower antenna array installation on the structure at 28 Sidney Street.
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?
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.
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).
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?
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?
19. Pursuant to CGS §16-50o, please submit a copy of the lease for the proposed site.
20. How is the cost of the tower construction recovered?
21. Estimate the total cost of the proposed project. Break down the total cost into categories that the Petitioner deems appropriate.

Site Search

22. Approximately when was the search ring established for the proposed facility?
23. Were other potential sites considered for the proposed facility? If so, please identify the other potential sites and why they were rejected.
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?

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?

Site/tower

26. Provide a revised property line map that clearly shows the boundaries of the host parcel(s).
27. What is the distance and direction of the proposed facility site from the existing structure at 28 Sidney Street?
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?
29. Who would own, operate and maintain the proposed facility?
30. Which entity (BOC or Verizon) is driving the required minimum height of the proposed facility?
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.
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.
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.
34. Has the Town of Stratford or City of Milford expressed an interest in co-locating emergency services antennas?
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?
36. What is the distance to the CT Metro North Commuter Railroad (MNRR) property line from the proposed facility?
37. What is the distance and direction to the closest UI electric transmission line structure from the proposed facility?
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?
39. Would the proposed monopole have a galvanized gray finish or a different color/finish? Explain.
40. Provide the approximate widths of the proposed tower at the base and at the top.

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?
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?
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.
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.
45. Referring to Site Plan C-2, what is the "THEORETICAL RAILROAD EMBANKMENT LINE?"
46. Referring to Site Plan C-2, what is the "THEORETICAL UNDERGROUND TRACK DISTURBANCE LINE?"
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?
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?
49. Would the tower be designed for EIA/TIA-222 structural standards version G, H, or both?
50. What type of antenna mount will be used for the proposed antennas? What is the structural design standard applicable to such antenna mount?

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.
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?
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.

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.
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.
56. Would the proposed site be needed for coverage, capacity, or both for Verizon (and T-Mobile, if applicable)? Explain.
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)?
58. What is the specific purpose of the 700 MHz and 2100 MHz systems for Verizon (and T-Mobile, if applicable)?
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?
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?
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?
62. What is the existing signal strength within the area Verizon (and T-Mobile, if applicable) is seeking to cover from this site?
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?
64. What was the approximate size of Verizon's (and T-Mobile's, if applicable) search area in the vicinity of the proposed site?
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?
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.

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.

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.
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)?
70. Would the backup generator(s) have containment measures to protect against fluid leakage?
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?
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?
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?
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?
75. Would the backup generator(s) be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

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?
77. Would T-Mobile’s antennas comply with federal E911 requirements, if T-Mobile is part of the proposed project?
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?
79. Would the proposed facility comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?
80. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)

81. Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.
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?
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?
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?
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?
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?
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?
88. Is the proposed site located within a FEMA designated special hazard zone?
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?
90. How would emergency vehicles be able to access the compound?
91. Referring to Site Plan C-1, what is the purpose of the 3-foot wide winter path?
92. What is the purpose of the elevated platform?
93. How would the proposed facility be protected from a train derailment?
94. At what height are the electric transmission line conductors on the UI pole?
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?
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?

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.
98. Explain how the proposed facility is consistent with the Long Island Sound Blue Plan.
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).
100. Were any stormwater-related drainage calculations or analysis performed? If so, provide the calculations or analysis.
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?
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.
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.
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?
105. Please characterize visibility of the proposed facility from the Housatonic River.
106. What is the potential for bird nesting at the proposed facility and how would BOC manage this?