

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
A PETITION OF CELLCO PARTNERSHIP D/B/A : PETITION NO. 1616
VERIZON WIRELESS FOR A DECLARATORY :
RULING ON THE NEED TO OBTAIN A SITING :
COUNCIL CERTIFICATE FOR THE :
MODIFICATION OF AN EXISTING :
TELECOMMUNICATIONS FACILITY AT 194 :
MOUNT PARNASSUS ROAD, EAST HADDAM, :
CONNECTICUT : JUNE 6, 2024

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

On May 17, 2024, the Connecticut Siting Council (“Council”) issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Petition No. 1616. Below are the Petitioner’s responses.

Notice

Question No. 1

Referencing Petition Attachment 9, has the Department of Transportation (DOT), Town of East Haddam (Town), Department of Emergency Services and Public Protection (DESPP) and/or any abutting property owners provided comments to Cellco Partnership d/b/a Verizon Wireless (Cellco) since the Petition filing? If so, please summarize the comments.

Response

The Petitioner has received no comments from the DOT, the Town or the DESPP. Counsel for the Petitioner received an email from Chet Slabinski, an abutter at 200 Mt. Parnassus Road expressing concerns about the proposal. A copy of Mr. Slabinski’s email and the Petitioner’s response are included in Attachment 1.

Question No. 2

Referencing Petition p. 5 and Attachment 8, Federal Aviation Administration (FAA) notification of the existing structure and of the proposed extended structure is recommended to determine if obstruction marking and lighting is required. Submit a copy of the FAA notice filing and the proposed obstruction marking and lighting scheme, if applicable.

Response

Cellco has not yet completed its FAA notification filing and typically would not do so until after the project is approved by the Council. Based on the preliminary Summary Report included in the Petition, no obstruction marking or lighting will be required for the proposed tower extension. A copy of the FAA notification will be submitted as soon as it is available.

Question No. 3

Does site construction require the use of a crane? If so, is notification to FAA required?

Response

Yes, Cellco anticipates that its site contractor will use a crane to extend the DESPP tower. The project construction contractor will be responsible for any FAA notifications required to use the crane.

Project Development

Question No. 4

What is the estimated cost of the project?

Response

The Petitioner estimates the cost of the project, as described in the Petition to be approximately \$250,000.

Question No. 5

How does the estimated cost of the proposed project compare generally with the costs to construct a new facility?

Response

The estimated costs to modify the existing facility referenced in response to Question No. 4 above, is significantly lower than the cost of constructing a new telecommunications facility at the Property which typically can cost between \$400,000 and \$600,000.

Question No. 6

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?

Response

No.

Existing Facility Site

Question No. 7

Referencing Petition p. 2 and Attachment 9, what state agency (or agencies) owns and operates the existing facility?

Response

According to the Cellco's contact at the DESPP, an Amended and Restated MOA (the "Amended MOA") between DOT and DESPP was executed 4/29/2013. A copy of the Amended MOA is included in Attachment 2.

According to the Amended MOA, DESPP will continue to Manage the DESPP facility. Definition of "Manage" or "Management" refers to the rights and responsibilities to operate and

maintain the site and the facilities on the site, including the right to remove, replace, modify, construct, install, operate, and repair the Telecommunication Facilities; to allow or refuse others the use of the Telecommunication Facilities and the site, and to maintain the grounds and all structures, fencing and generators on the site. The Amended MOA will continue until DESPP ceases to use the site, in which case management will revert to DOT.

Question No. 8

What is the current lighting scheme at the existing facility site? During what hours and for what activities is it employed?

Response

The current DESPP tower is not marked or lit.

Question No. 9

What is the mesh size of the existing perimeter fence?

Response

The existing fence is an 8-foot-tall black vinyl-coated chain link fence with barbed wires and a 1 ¼ inch mesh, using an 11-gauge wire. The proposed fence will match the existing fence.

Question No. 10

What is the distance from the centerline of the existing lattice tower to the nearest property line, nearest residence, and northern boundary of Mt. Parnassus Road?

Response

The centerline of the existing lattice tower is approximately 22 feet from the nearest property line to the south; approximately 200 feet to the nearest residence at 200 Mt. Parnassus Road; and approximately 64 to the south of the northern boundary along the Mt. Parnassus Road right of way.

Question No. 11

Referencing Petition Attachments 2 and 4 (Sheet Z-2), Cellco's lease area within the existing fenced equipment compound is 12' X 20' and Cellco proposes to expand the northwest corner of the equipment compound to install its utility equipment. Is the compound expansion area part of the lease?

Response

The small, fenced compound expansion is needed to keep all utility interconnections and backboards within the secure facility compound. This minor modification to the compound fence is contemplated in the lease.

Question No. 12

Referencing Petition No. 1130, Exhibit 1, available at the following link - [pe1130_filing_statepolice_easthaddam.pdf \(ct.gov\)](#) – how does Cellco's proposed extension of the existing facility comply with the provisions of the 2010 Memorandum of Agreement (MOA) Between DOT and DESPP? Is the MOA still valid?

Response

The 2010 MOA was amended and restated in 2013 and remains valid. *See* Cellco's response to Question No. 7 above and Attachment 2 to these responses. According to the Amended MOA, DESPP is responsible for the management of the site.

Question No. 13

Would Cellco's proposed lattice tower extension and equipment installation comply with the Site Installation and Appearance Standards in Attachment D of the MOA and/or any applicable updated agreement standards? Explain.

Response

Yes. We do note that the MOA references versions of State and National codes and standards in effect at the time the MOA was executed. Cellco will commit to comply with the codes and standards in place when its improvements are permitted and completed.

Existing Facility

Question No. 14

Referencing Exhibit 7 of Petition 1130 – available at [pe1130_filing_statepolice_easthaddam.pdf \(ct.gov\)](#) – FAA determined the existing facility “is not a hazard for air navigation up to 126’ above ground level” and does not require marking or lighting for aviation safety (Emphasis added).

- a. What are the nearest public or private airfields to the existing facility site and where are they located?
- b. Has Cellco consulted with the Connecticut Airport Authority regarding the proposed tower replacement and height extension?

Response

- a. The nearest public or private airfield to the existing facility site is the Goodspeed airport located approximately 2.8 nautical miles to the southwest.
- b. Cellco has not consulted with the Connecticut Airport Authority.

Question No. 15

Referencing Petition Attachment 5, Section 1-1 to 1-2, what entity is identified as “VS/QV?”

Response

The entity identified as VS/QV stands for Valley Shore / Quinebaug Valley.

Question No. 16

Referencing Petition Attachment 1, a lattice tower provides stability needed by DESPP to maintain microwave links between its adjacent sites. What are the advantages and/or disadvantages of the existing lattice tower design for Cellco to meet its service objectives?

Response

The tower stability standards needed referenced are more critical for maintaining the microwave links used by DESPP. Cellco's antenna installation will certainly benefit from these higher stability standards, but the standards are less critical to the operation of Cellco's antennas.

Proposed Facility Extension and Associated Equipment

Question No. 17

Does Cellco have a lease for the tower extension, equipment installation and required ground space?

Response

Yes, the parties have come to an agreement for the expansion and shared use of the DESPP tower facility.

Question No. 18

Would the state assume ownership and/or management of the tower extension after construction?

Response

Yes.

Question No. 19

Referencing Petition Attachment 4, Sheet Z-1, what are the dimensions of the proposed fence expansion area?

Response

The fence expansion area is an irregular shape that is roughly 8 feet deep by 12.5 feet wide, total square footage of the area is approximately 134 square feet.

Question No. 20

Referencing Petition Attachment 4, Sheet Z-2, what is the significance of the “4’ CLR” note in the expanded fence area?

Response

The “4’ CLR” callout is in reference to the minimum clearance required per NEC from the face of the service meter to the metal chain link fence.

Question No. 21

Could the proposed extended facility and existing foundations accommodate an additional increase in height? Explain.

Response

Yes. The tower was originally designed to be 180 feet tall. The (20-foot) tower sections that were installed currently total 120 feet. Cellco is proposing a 40-foot extension which would bring the total height of the tower to 160 feet. There is still room in the original tower and foundation design for an additional 20-foot tower extension, if needed to 180 feet.

Question No. 22

Could the proposed extended facility support additional tenants? If so, at what levels?

Response

Yes. Commercial carriers typically lease a 10-foot vertical space on the tower for their equipment. Subject to separate structural evaluations, two additional carriers could co-locate on the proposed tower if the Cellco extension is approved. Available antenna locations are above

and below the proposed Cellco equipment at the 135 foot and 155 foot levels on the tower.

Question No. 23

Have any other carriers expressed an interest in locating at the proposed extended facility?

Response

No other carriers have expressed an interest in sharing the tower at this time.

Question No. 24

Would the proposed lattice tower extension match the existing lattice tower (ex. finish, cross-arm pattern)?

Response

Yes.

Question No. 25

What type of maintenance would be required for the proposed lattice tower extension?

Response

Maintenance of the expanded tower will be the responsibility of the DESPP and will be consistent with its current practices. Cellco's site technicians will monitor the antennas and cell site equipment 24/7/365 from its switch facility.

Proposed Wireless Services

Question No. 26

Referencing Petition p. 3 and Attachment 3, would the proposed equipment provide 5G service?

Response

The proposed Cellco equipment would be capable of providing 5G services.

Question No. 27

When did Cellco discover a need for service in the surrounding area?

Response

Cellco identified a need for service and a new facility in this portion of East Haddam in 2022.

Question No. 28

Approximately when did Cellco establish a search ring?

Response

The East Haddam 3 search ring was established in February of 2023.

Question No. 29

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

Response

Consistent with its site search practices, Cellco first seeks to identify existing towers and other tall structures in or near a search area, before considering the development of a new “raw land” tower site. In this instance, Cellco explored the use of three (3) other existing structures in the area, in addition to the DESPP tower site. The existing CTI tower site at 101 Parker Road was rejected by RF because it is located too far to the east to satisfy Cellco’s wireless service objectives. An existing Silo structure at 91 Maple Avenue was considered and rejected because it was not tall enough to meet Cellco’s wireless service objectives. An existing tower at the East Haddam Fire Department, 440 Town Street is too short (45 feet) to satisfy Cellco’s wireless service objectives.

Question No. 30

Referencing Petition Attachment 7, would RF emissions comply with the FCC MPE levels at distant, but equivalent or higher elevations than the extended facility, such as the property located at 200 Mount Parnassus Road? Explain.

Response

The dwelling at 200 Mount Parnassus Road is approximately 200 feet from the existing tower and at a ground elevation of 611 feet AMSL, which is about 16 feet higher than the ground elevation at the existing tower site. To model this specific case, we can assume that all the antenna heights on the tower are 16 feet lower than they are, while leaving all other worst-case assumptions in place. The resulting increase in the overall Maximum Permissible Exposure (“MPE”) percentage, predicted for this point in this scenario would be less than 1% and still well below the maximum MPE % previously calculated as 8.66% at a point 88 feet from the tower.

Question No. 31

Referencing Petition p. 3 and Attachment 3, provide the approximate square mileage of the existing and proposed 700 MHz coverage area and the additional road mileage of proposed 700 MHz coverage for Route 434 (Mt. Parnassus Road) and surrounding local roads.

Response

Street Name	700 MHz	
	RSRP/ -85 dBm	RSRP/ -95 dBm
Mt. Parnassus Road	2.86 miles	2.97 miles
Shenanigans Road	0.79 miles	0.79 miles
Ballahack Road	0.36 miles	0.36 miles
Ballahack Road #1	0.64 miles	0.64 miles
Ballahack Road # 2	0.75 miles	0.79 miles
Bogue Lane	0.6 miles	0.6 miles
Parker Road	0.95 miles	0.95 miles
Overall Coverage Footprint	27.2 sq miles	83.6 sq miles

Question No. 32

Would the proposed extended facility interact with the proposed telecommunications facility that is the subject of Council Docket No. 520? Explain.

Response

No. Given the distance between the two proposed site locations, there would be little or no interaction (minimal overlapping coverage) between the 124 Ague Spring Road site and the 194 Mount Parnassus Road site.

Energy Backup Power

Question No. 33

Referencing Petition Attachment 1 and Attachment 4, Sheet Z-2, could Cellco tap into the existing 1,800-gallon propane tank and/or install its own propane-fueled emergency backup generator?

Response

As the Council is aware, Cellco's strong preference is always to own, operate and maintain its own cell site equipment, including backup power supply and fuel source at cell site locations. That said, it would be possible, with DESPP's permission, to tap into the existing propane tank and use a propane tank rather than the proposed diesel generator. There are no on-site or nearby off-site wetlands or watercourse of concern to Cellco to warrant the use of a propane generator.

Question No. 34

Cellco's emergency backup power source is described as a 50-kW diesel generator:

- a. How often would refueling be required?
- b. How long would the generator be capable of powering Cellco's equipment with the fuel tank at maximum capacity?

Response

The proposed 50 kW diesel generator proposed at the DESPP site maintains a 210-gallon “belly” fuel tank as a part of the generator unit. At full load, the generator consumes 4.6 gallons of fuel per hour and can operate for approximately two before refueling would be required.

Question No. 35

Referencing Petition Attachment 4, Sheets Z-2 and D-2, Cellco’s emergency backup generator would be sheltered by a weather canopy. Has Cellco installed weather canopies at other tower sites? If so, how effective are weather canopies of this type? Are there alternate shelter designs? Explain.

Response

The proposed weather canopy will cover Cellco’s equipment cabinets and is designed to shelter cell site technicians when servicing outdoor equipment and are effective in doing just that. As the Council is aware, Cellco has, in the past, installed stand-alone equipment shelters at its macro-cell sites. The installation of outdoor equipment cabinets and generators on concrete pads also provides Cellco with site development cost savings associated with the shelter.

Question No. 36

Would battery backup power be installed? How long would a battery backup alone supply power to Cellco’s equipment at the extended facility?

Response

Yes. In addition to its equipment cabinet, Cellco will install a back-up battery cabinet, which could provide up to 8 hours of power to the facility if commercial power is interrupted and the generator is not operating properly.

Public Health and Safety

Question No. 37

Referencing Petition Attachment 1, Sheet Z-2, particularly the note to maintain a minimum 3' separation between conduit and the buried propane tank, could the construction or operation of the proposed extended facility impact or interfere with any existing utilities or infrastructure within the host parcel? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

Response

Typically, underground utility conduits are run along the outside fence line to avoid underground utilities for other occupants on the site. Utilities at this site are anticipated to be on the opposite side of the existing propane tank running from the tank to the existing building. Other utilities are not believed to be in the area of the proposed conduit. Call Before You Dig (811) shall be contacted for a final check to mark out the site prior to construction.

Question No. 38

Identify the safety standards and/or codes that are applicable to equipment, machinery and technology that would be used or operated at the proposed extended facility.

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.
- National Electric Code (NFPA 70).
- 2021 International Mechanical Code, with the 2022 Connecticut State Building Code amendments.
- 2022 Connecticut State Fire Safety Code.

- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".
- Occupational Safety and Health Administration (OSHA).

Question No. 39

Would Cellco's proposed equipment installation be capable of supporting text-to-911 service? Is additional equipment required for this purpose?

Response

Yes.

Question No. 40

Would Cellco's proposed installation comply with federal E911 requirements and the intent of the Warning, Alert and Response Network of 2006?

Response

Yes.

Question No. 41

What measures are existing and proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, etc.)

Response

The existing facility compound will be surrounded by an eight (8) foot tall chain link security fence and gate. The gate will be locked with access limited to the DESPP and Cellco. Cellco's wireless equipment will maintain separate silent intrusion alarms which are monitored remotely.

Question No. 42

Would any security lighting be installed at the site? If so, what type and for what

purpose? During what hours and for what activities would it be employed?

Response

Cellco will install motion activated lighting for use by its technicians if a maintenance visit needs to occur in the evening.

Question No. 43

What is the noise profile of the proposed 50-kW emergency backup generator? How often would it be run for maintenance purposes, and on what days and at what time would this maintenance occur?

Response

According to the manufacturer's generator specifications, the sound pressure level for a 50kW generator at 60Hz with full load is approximately 79 dB at a distance of 7m (23'). Sound levels drop to 64dB with the inclusion of a sound attenuation coverage.

Cellco's standard practice is to exercise its generators for approximately 20 minutes every two weeks. Generators are typically exercised on a weekday, during the late morning hours.

Question No. 44

Would cumulative operation of the noise-generating equipment at the extended facility site comply with state noise standards at the property lines?

Response

A noise study would be required to determine the cumulative noise level of all equipment at the site and compliance with local/state noise standards. Cellco would agree to complete such a post development study if required by the Council.

Question No. 45

Could the proposed tower extension be designed with a yield point to ensure the tower setback radius remains within the boundaries of the host parcel? If so, at what height would the yield point be installed?

Response

According to the “Final Structural Design Drawings for Foundation” and the “Final Drawings for Tower” filed with the Council in Petition No. 1130, the existing DESPP tower foundation and lattice tower structure was designed to be extended to a height of 180 feet with no yield point included. Cellco’s project engineer did reach out to the original tower designer/manufacturer (Valmont) who confirmed that adding a yield point at this stage is not feasible.

Question No. 46

Referencing Petition Attachment 4, Sheet Z-2, a 4’ lightning rod is depicted as “OPTIONAL.” Does the existing facility host a lightning rod? Why is a lightning rod optional for the extended facility? Explain.

Response

To our knowledge, the lightning rod or lightning terminal protection systems for structures are typically not a requirement of national building codes. Lightning rods attract lightning and are intended to protect equipment. Under Section 10 in TIA Rev H, it does not appear that a lightning rod is required to be installed, however, grounding terminals and electrodes in the ground are necessary. It is Cellco’s practice to install lightning rods on towers and structures and the plans have shown it as optional however, the existing lightning rod will likely be relocated to the top of the proposed tower extension in this case.

Extended Facility Construction

Question No. 47

Provide typical construction workdays and hours, and the anticipated duration of construction.

Response

Construction would occur from 7 a.m. to 5 p.m. Monday through Saturday and is expected to take 12 months.

Question No. 48

Could Cellco install its meter and utility equipment at a location within the existing compound rather than extend the existing compound and fence?

Response

Verizon could install a single meter near the proposed equipment inside the existing compound. A meter bank is shown to promote future co-locations by other carriers and the location is ideally right next to the main access gate. It is also in-line with where the main power and telco/fiber services enter the compound.

Question No. 49

Would a service outage or a temporary tower be required to maintain DOT, DESPP and Town service during the installation of Cellco's proposed lattice extension and equipment on the existing facility? Explain.

Response

Cellco does not anticipate the need for a temporary tower at this site to maintain DOT, DESPP or town service during installation. The tower extension should allow Cellco to co-locate without disturbing the existing equipment on the tower. Temporary service outages may

be required for the microwave dishes on the tower so that the crew can safely secure the tower extension to the existing tower legs. Any outage will be coordinated with the DESPP.

Environmental Effects and Mitigation Measures

Question No. 50

Referencing Petition Attachment 6, the maps on the last two pages are cutoff. Please re-submit the maps on larger sized paper.

Response

Full size viewshed maps are included in Attachment 3.

Question No. 51

Referencing Petition No. 1130, Exhibit 3, available at the following link - [pe1130_filing_statepolice_easthaddam.pdf \(ct.gov\)](#) – the State Historic Preservation Office (SHPO) determined that no historic properties would be affected by the 2014 DOT replacement tower. Has Cellco consulted with SHPO regarding the proposed extension of the facility?

Response

Cellco has not yet consulted with the SHPO about the proposed extension of the DESPP facility tower. Cellco has confirmed however, that there are still no historic properties within 0.5 miles (the Area of Potential Effect, or “APE”) of the existing DESPP facility.

Question No. 52

Where is the nearest national, state and/or locally designated scenic road from the site? Characterize the change in visibility, if any, from the nearby scenic road(s) for the proposed extended facility versus the existing facility.

Response

The nearest scenic road from the Property is State Route 149-North (a State-designated

scenic road), approximately 2.8 miles to the west. The existing DESPP tower is not visible from this area today. The proposed extended DESPP tower will also not be visible from this scenic road due to distance and intervening topography and vegetation between the two locations.

Question No. 53

What is the distance and direction of the proposed site/limits of disturbance associated with Cellco's proposed extended facility (fence extension) to the nearest mapped wetland? What type of wetland is located here? (e.g. stream, highway drainage)

Response

Based on a review of publicly available mapping sources, the nearest wetland is approximately 300 feet to the north across Mount Parnassus Road, consisting of a forested wetland system that serves as a headwater wetland feeding the Hemlock Valley Brook riparian corridor.

Question No. 54

Is the existing facility site located in a DEEP Natural Diversity Database buffered area?

Response

The existing facility is not located in a DEEP Natural Diversity Database ("NDDB") buffered area. The nearest NDDB buffered area is located approximately 0.5 miles to the north and west of the Facility.

Question No. 55

Referencing Petition Attachment 4, provide the best management practices, including, but not limited to, any erosion and sediment control measures, that would be employed during construction.

Response

During construction, the contractor will employ best management practices to prevent excessive runoff and capture sediment. All disturbed areas to have a silt fence with hay bales or filter socks installed on the downslope side prior to excavation. All disturbed areas to be backfilled and finished with crushed stone within the compound or will be seeded and protected with hay until stabilized.

Question No. 56

Referencing Petition Attachment 4, Sheet Z-2, what is the total limit of disturbance for the proposed fence extension area?

Response

Total limit of disturbance for the fence extension area is approximately 225 square feet including the fence extension and bollards needed to protect the meter bank.

Question No. 57

Referencing Petition Attachment 4, Sheet Z-2, what is the distance of the limit of disturbance from the proposed fence extension to the stone wall?

Response

The edge of the stone wall is approximately 8 inches from the existing fence line. The limit of disturbance will likely run up to the stone wall while being careful not to disturb the integrity of the existing wall when installing footings for the new fence posts.

Question No. 58

Referencing Petition Attachment 6, characterize the change in visibility of the proposed extended facility versus the existing facility in the immediate and surrounding area.

Response

The change in visibility of the proposed extended facility tower versus the existing facility in the immediate and surrounding area can best be characterized as minor, with a shift to what are primarily seasonal views to a greater mix of seasonal and year-round views. As noted in the conclusion to the Visibility Analysis (Petition - Attachment 6), the existing facility is visible today primarily within 0.25-mile or less of the site. The proposed 40-foot extension of the tower will make the facility more prominent in some locations, particularly where the current facility is visible through intervening vegetation today, as it will rise farther above the tree line. Photos 2 and 4, and their corresponding simulations, provide examples. Notably, no new areas of visibility are created by the proposed extension.

Question No. 59

Identify the nearest “Important Bird Area” as designated by the National Audubon Society.

Response

The nearest Important Bird Area (IBA) to the Facility is located ± 0.25 mile to the east, which is identified as the Lyme Forest Block and consists of more than 60,000 acres of relatively undeveloped forest habitat in the towns of East Haddam, Colchester, Lyme, Old Lyme, East Lyme, and Salem. Although other habitats exist within this IBA, the large forest block provides valuable habitat for forest interior neotropical birds. With the Facility located within perforated edge forest habitat in close proximity to Mount Parnassus Road and nearby residential developments, combined with minimal tree removal required to accommodate the proposed expansion, no adverse impact to this nearby IBA is anticipated.

Question No. 60

What is the propensity for avian nesting and perching on the proposed extended facility?

How would this be managed?

Response

With Bashan Lake located ± 1 mile north of the Facility, the existing tower could be used as a nesting site by ospreys. In general, tower nest deterrent systems provide unreliably consistent results that prevent ospreys from nesting. Should ospreys establish a nest on this tower, any construction/maintenance activities would be required to comply with the Federal Migratory Bird Treaty Act. Perching on towers by several transient avian species is not uncommon and typically do not disturb the facilities or the birds themselves.

Question No. 61

Would the proposed extended facility comply with the USFWS Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance and Decommissioning? (available at <https://www.fws.gov/sites/default/files/documents/usfws-communication-towerguidance.pdf>)

Response

The Facility would comply with the USFWS tower design, siting, construction, operation and maintenance recommended best practices for minimizing the potential impacts to bird species. The 40-foot extension of the self-supporting lattice tower would increase the tower height to 161 feet, complying with the recommendation that new towers should be not more than 199 feet above ground level. The existing tower is not located within or near wetlands, known bird concentration areas or habitat of threatened or endangered species. Further, the facility does not contain guy wires, and will remain unlit.

ATTACHMENT 1

Baldwin, Kenneth

From: chetsubaccount@snet.net
Sent: Monday, February 26, 2024 3:19 PM
To: Baldwin, Kenneth
Subject: RE: East Haddam Cellco petition

CAUTION: EXTERNAL EMAIL

Thank you!

From: Baldwin, Kenneth <KBALDWIN@RC.com>
Sent: Monday, February 26, 2024 11:31 AM
To: chetsubaccount@snet.net
Subject: RE: East Haddam Cellco petition

I'm not sure what the problem is with the Siting Council's web site. I just shot them an email to see if they can fix the issue.

Attached is an electronic version of the full petition for your review.

The Siting Council hasn't set a schedule yet for this Petition. They will do so shortly. Public Hearings are not required for Petitions. The Council has the discretion to hold a Public Hearing if they believe it's needed. That's another decision they will make at a later date.

Your contact at the Council would be its Executive Director, Melanie Bachman. Her email address is Melanie A. Bachman Esq. melanie.bachman@ct.gov

Kenneth C. Baldwin

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From: chetsubaccount@snet.net <chetsubaccount@snet.net>
Sent: Monday, February 26, 2024 10:42 AM
To: Baldwin, Kenneth <kbaldwin@rc.com>
Subject: East Haddam Cellco petition

CAUTION:

EXTERNAL EMAIL

Dear Mr. Baldwin,

Thank you for the notification of the Cellco petition being formulated for the Connecticut Siting Council regarding the Mount Parnassus property adjacent to ours. Has this been filed? I cannot find a Petition number in your letter. The CSC website now lists PETITION NO. 1616, but clicking its hyperlink returns the message:

“404 Error - Page Not Found

This error means:

- The page no longer exists, or
- The page has moved to a different page or website, or...”

A height increase to 140’ of the existing tower and an additional 50KW diesel generator that are both less than 40 feet from our property line? Of course we have some serious concerns. The reduced size design drawings you sent do not appear to address the impact of this project on us. Perhaps this is contained in the drawing notes, but they are too small and blotchy to read. Would you send me full-size versions or a link where I might find them?

Also, please advise the schedule of this approval process, specifically the dates for any public hearings or comment periods.

Sincerely,
Chet Slabinski
200 Mt Parnassus
East Haddam

This transmittal may be a confidential R+C attorney-client communication or may otherwise be privileged or confidential. If it is not clear that you are the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution, or copying of this transmittal is strictly prohibited. If you suspect that you have received this communication in error, please notify us immediately by telephone at 1-860-275-8200, or e-mail at it-admin@rc.com, and immediately delete this message and all its attachments.

ATTACHMENT 2

AMENDED AND RESTATED MEMORANDUM OF AGREEMENT
Between
THE CONNECTICUT DEPARTMENT OF TRANSPORTATION
BUREAU OF HIGHWAY OPERATIONS
And
THE CONNECTICUT DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC
PROTECTION
DIVISION OF STATE POLICE
Regarding
MT. PARNASSUS ROAD IN HADDAM, CONNECTICUT

This Amended and Restated Memorandum of Agreement (AGREEMENT) is made this 29th day of April, 2013, by and between the DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION, DIVISION OF STATE POLICE, hereinafter referred to as "STATE POLICE," acting by and through its Commissioner, Reuben F. Bradford, pursuant to Connecticut General Statutes Section 4-8, and the DEPARTMENT OF TRANSPORTATION, BUREAU OF HIGHWAY OPERATIONS hereinafter referred to as "DOT," acting by and through its Commissioner, James Redeker, pursuant to Connecticut General Statutes Section 13b-4(8), both of the State of Connecticut ("State"), for the sharing of telecommunications facilities at Mt. Parnassus Road in East Haddam, Connecticut.

WHEREAS, DOT maintains custody and control of certain real property located at Mt. Parnassus Road in East Haddam, Connecticut, recorded on the land records for the Town of East Haddam as 2002 Map 39 – Lot 64, hereinafter referred to as the "SITE";

WHEREAS, DOT and STATE POLICE entered into a Memorandum of Agreement dated August 20, 2010, as revised by the First Amendment dated July 27, 2011 and the Second Amendment dated July 9, 2012 (the "Original MOA"), for the management by STATE POLICE of the SITE and for the sharing of telecommunications facilities on the SITE; and

WHEREAS, STATE POLICE and DOT wish to amend and restate in this AGREEMENT the terms and conditions of the management of the SITE by STATE POLICE and the shared use of the SITE and the telecommunications facilities on the SITE by DOT and STATE POLICE.

NOW, THEREFORE, in consideration of the mutual covenants contained herein and other good and valuable considerations receipt of which the parties acknowledge, STATE POLICE and DOT hereby agree as follows:

1. DEFINITIONS

For the purposes of this AGREEMENT, the following definitions apply:

(A) "Agency Room" refers to the agency room in the Existing Building, the Proposed Building, or any equivalent building or structure constructed on the SITE by STATE POLICE under its Management.

(B) "Existing Building" means the building existing at the time of execution of this AGREEMENT, as shown on Attachment A entitled "CTS Project Mt. Parnassus site Plan, Drawing Number 052-200, dated February 8, 2010.

(C) "Existing Tower" means the radio tower existing at the time of execution of this AGREEMENT, as shown on Attachment A.

(D) "Facilities" means telecommunications facilities on the SITE, including, but not limited to, the radio tower, radio transmitting and receiving antennas, and any associated electronic equipment and

infrastructure, existing at the time of execution of this AGREEMENT and as may be constructed or installed by STATE POLICE under its Management.

(E) "Manage" or "Management" refers to the rights and responsibilities to operate and maintain the SITE and the Facilities on the SITE, including: to remove, replace, modify, construct, install, operate and repair the Telecommunication Facilities; to allow or refuse others the use of the Telecommunication Facilities and the SITE; and to maintain the grounds and all structures, fencing and generators on the SITE.

(F) "Proposed Building" means the equipment shelter to be constructed by STATE POLICE under this AGREEMENT, as shown on Attachment A

(G) "Proposed Tower" means the radio tower to be constructed by STATE POLICE under this AGREEMENT, as shown on Attachment A

(H) "Tower" refers the Existing Tower, the Proposed Tower and any other radio tower(s) or equivalent structure(s) or equipment installed on the SITE by STATE POLICE under its Management.

2. MANAGEMENT & USE OF THE SITE BY STATE POLICE

(A) STATE POLICE shall MANAGE the SITE and the Facilities on the SITE, at no expense to DOT.

(B) STATE POLICE agree to use the SITE for telecommunications purposes and to maintain a radio tower or equivalent telecommunications facilities necessary for use of the SITE for telecommunications purposes.

3. CONTINUED USE BY DOT

(A) DOT is reserved the right to use the SITE at no cost to DOT, including use of the Facilities, for DOT's telecommunication purposes.

(B) DOT shall be permitted to keep radio equipment installed on the Tower and in the Agency Room and to use the CTS Microwave Network. STATE POLICE shall continue to provide sufficient space on the Tower and in the Agency Room, at no cost to DOT, for the installation of DOT's radio equipment.

(C) All operation and maintenance costs associated with DOT's radio equipment shall be the responsibility of the DOT.

4. CONSTRUCTION & INSTALLATION

(A) STATE POLICE shall remove the Existing Tower and Existing Building and construct the Proposed Tower and Proposed Building as specified on Attachment A, at no cost to DOT.

(B) STATE POLICE shall be responsible for providing and installing a new antenna system for DOT's radio equipment on the Proposed Tower, at the 120' position, at no cost to DOT, in accordance with Attachment B entitled "CTS Project Mt. Parnassus Elevation and Antenna Locations, Drawing Number 052-515, dated March 23, 2010, and Attachment C entitled "Antenna Inventory."

(C) DOT shall be responsible for relocation and reinstallation of its radio equipment within the space made available by STATE POLICE in the Agency Room of the Proposed Building in accordance with Attachment B.

(D) Completing construction of the Proposed Tower and the Proposed Building is a MANAGEMENT responsibility of STATE POLICE. Any proposed revision to or cancellation of the

construction of the Proposed Tower or Proposed Building must be presented to DOT for its prior written approval.

5. DOT USE OF STATE POLICE CTS MICROWAVE NETWORK

STATE POLICE shall continue to provide and maintain in good working order, at no expense to DOT, microwave circuits allocated for DOT in accordance with Attachment D entitled "DOT Circuits on CTS Microwave Network." Maintenance, alarming, monitoring and coordination of the microwave circuits allocated for DOT will be provided by STATE POLICE and controlled by the CTS Network Control Center, at no cost to DOT for the duration of the AGREEMENT.

6. POWER

STATE POLICE shall, at its expense, supply heat and air conditioning for the Agency Room. Electric power for Tower functions shall be made available by STATE POLICE, at its expense, utilizing existing public utility service, and in case of power failure, by a generator. Each party shall be responsible for damages, direct or consequential, to its own equipment and/or system as a result of any electrical anomalies.

7. EQUIPMENT INSTALLATION, MAINTENANCE AND REPAIR

Once STATE POLICE installs DOT equipment on the Tower, DOT shall thereafter be responsible, at its expense, for all maintenance, replacement or augmentation of its antenna and related equipment installed on the Tower and DOT's radio equipment installed in the Agency Room. All installations performed by DOT shall be in accordance with Attachment B entitled "Site Installation and Appearance Standards (Rev. 2012)."

8. INTERFERENCE

As of the commencement of this AGREEMENT, DOT and STATE POLICE are the only users of the Facilities on the SITE. With respect to third party users that STATE POLICE allows to use the Facilities, STATE POLICE, pursuant to its license agreement with any third party, shall require any third party user upon causing interference with DOT radio equipment to immediately work with DOT to resolve said interference to the mutual satisfaction of the parties, at the third party user's expense. STATE POLICE will provide DOT with the identity and contact information of any third party users. In the event that any third party user fails or refuses to meet its obligations to resolve such interference issues under any license agreement with the STATE POLICE pertaining to the Facilities, the STATE POLICE affirms to DOT that it shall take such action as is necessary to enforce such provisions of and pursue remedies available under the license agreement to the extent permitted by law. Should any interference caused by DOT to any current or future STATE POLICE radio equipment be immediately unresolvable, DOT shall cease operation of said radio equipment, except for testing purposes until said interference is eliminated to the satisfaction of the STATE POLICE. STATE POLICE acknowledges that the DOT radio system is essential for DOT operations and highway safety and shall cooperate with DOT in both resolving any interference issues prior to resorting to cessation of operation of DOT radio equipment and, if unresolvable such that operation of DOT radio equipment must cease in the interim, then to the extent practicable in minimizing the period of time during which DOT radio operations are ceased. This provision controls and supersedes any contradictory language contained in paragraph 3.1.3 of Attachment E.

9. ACCESS TO TOWER FOR CHANGES/ADDITIONS

DOT agrees that it shall not add to, change, or modify its equipment on the Tower without first obtaining authorization to do so from the STATE POLICE, in writing. Before any work on the Tower is to be performed, no later than forty-eight (48) hours before arrival at SITE, DOT must call, the STATE POLICE's Network Control Center (NCC) at (860) 685-8008 and provide the intent of the visit and the

name, company, and title of the individual(s) who will be at the SITE to work on DOT equipment on the Tower.

10. ACCESS TO AGENCY ROOM AT SITE

Pursuant to the rights reserved to DOT in Section 1, DOT, its contractors, agents, servants, and employees are permitted to enter the Agency Room on the SITE for the purpose of installing, maintaining and repairing DOT's radio equipment twenty-four (24) hours per day, seven (7) days per week. The SITE, including the Agency Room, shall be considered "restricted," and DOT and its employees shall not provide or permit access to the SITE for person(s) except as such person(s) is/are acting as contractors or agents for DOT in the performance of activities that DOT is permitted to perform under this AGREEMENT. DOT shall be allowed immediate access to the SITE and the Agency Room should its equipment malfunction. Under such circumstances, DOT will give as much notice as possible under the circumstances to the STATE POLICE's NCC at (860) 685-8008.

11. TERM AND TERMINATION

(A) Upon the date of full execution by the parties, this AGREEMENT shall become effective and supersede the Original MOA. The AGREEMENT shall continue until STATE POLICE ceases to use the SITE for telecommunications purposes, ceases to maintain a Tower or equivalent telecommunications facilities necessary for use of the SITE for telecommunications purposes and/or fails to MANAGE the SITE as required by this AGREEMENT. In any such event, the AGREEMENT will terminate and Management of the SITE shall revert to DOT, effective upon the date stated in the notice sent from DOT to STATE POLICE in accordance with Section 12.

(B) Upon termination of the AGREEMENT, the parties will mutually agree in writing as to the terms of shared use of the SITE going forward and/or the removal of either of the parties' equipment or other installations from the SITE, as applicable. In such event, the STATE POLICE is reserved the right to remove any electronic equipment, antennas, transmission lines or other movable items owned by it from the SITE, provided the parties agree to a reasonable removal plan that ensures that there is no interruption to DOT's radio communications.

12. NOTICE

All notices hereunder must be in writing and shall be sent by certified mail, return receipt requested, or by e-mail with confirmation of receipt, to the following (or to any other address that the party to be notified may have designated by like notices).

To:	Department of Emergency Services & Public Protection Division of State Police CTS Unit 1111 Country Club Road Middletown, CT 06457	Department of Transportation Bureau of Highway Operations 2800 Berlin Turnpike P.O. Box 317546 Newington, CT 06131 Attn: Bureau Chief
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13. ENTIRE UNDERSTANDING & AMENDMENTS

(A) It is hereby mutually agreed and understood that this AGREEMENT contains all agreements, promises and understandings between the parties.

(B) This AGREEMENT may be amended by mutual written agreement of the parties signed by the Commissioners of DOT and STATE POLICE.

14. DAMAGE TO THE SITE

(A) DOT shall use due care to avoid damage to the SITE. DOT shall immediately report to STATE POLICE the occurrence of any such damage and shall repair, or have repaired, such damage to the reasonable satisfaction of and at no expense to STATE POLICE, but only to the extent that the damage was caused by DOT, its contractors, agents, servants, and employees.

(B) STATE POLICE shall use due care to avoid damage to DOT equipment installed at the SITE. STATE POLICE shall immediately report to DOT the occurrence of any such damage and shall repair, or have repaired, such damage to the reasonable satisfaction of and at no expense DOT, but only to the extent that the damage was caused by STATE POLICE, its contractors, agents, servants, and employees.

15. GOVERNOR'S EXECUTIVE ORDERS

The parties, as State agencies, are both subject to provisions of Executive Order No. 7C of Governor M. Jodi Rell, promulgated July 13 2006, concerning contracting reforms; Executive Order No. 14 of Governor M. Jodi Rell, promulgated April 17th, 2006, concerning procurement of cleaning products and services; Executive Order No. Three of Governor Thomas J. Meskill, promulgated June 16, 1971, concerning labor employment practices; Executive Order No. Seventeen of Governor Thomas J. Meskill, promulgated February 15, 1973, concerning the listing of employment openings and Executive Order No. Sixteen of Governor John G. Rowland promulgated August 4, 1999, concerning violence in the workplace, all of which by reference are incorporated into and made a part of this AGREEMENT.

16. GOVERNMENTAL APPROVALS

STATE POLICE and DOT each represents that prior to execution of this AGREEMENT, it has all necessary governmental approvals for its respective use of the Tower including any approvals from, or notices to, the Connecticut Siting Council. If any additional approvals are required during the duration of the AGREEMENT, DOT and STATE POLICE agree to use reasonable and diligent efforts to obtain such respective approvals as promptly as possible.

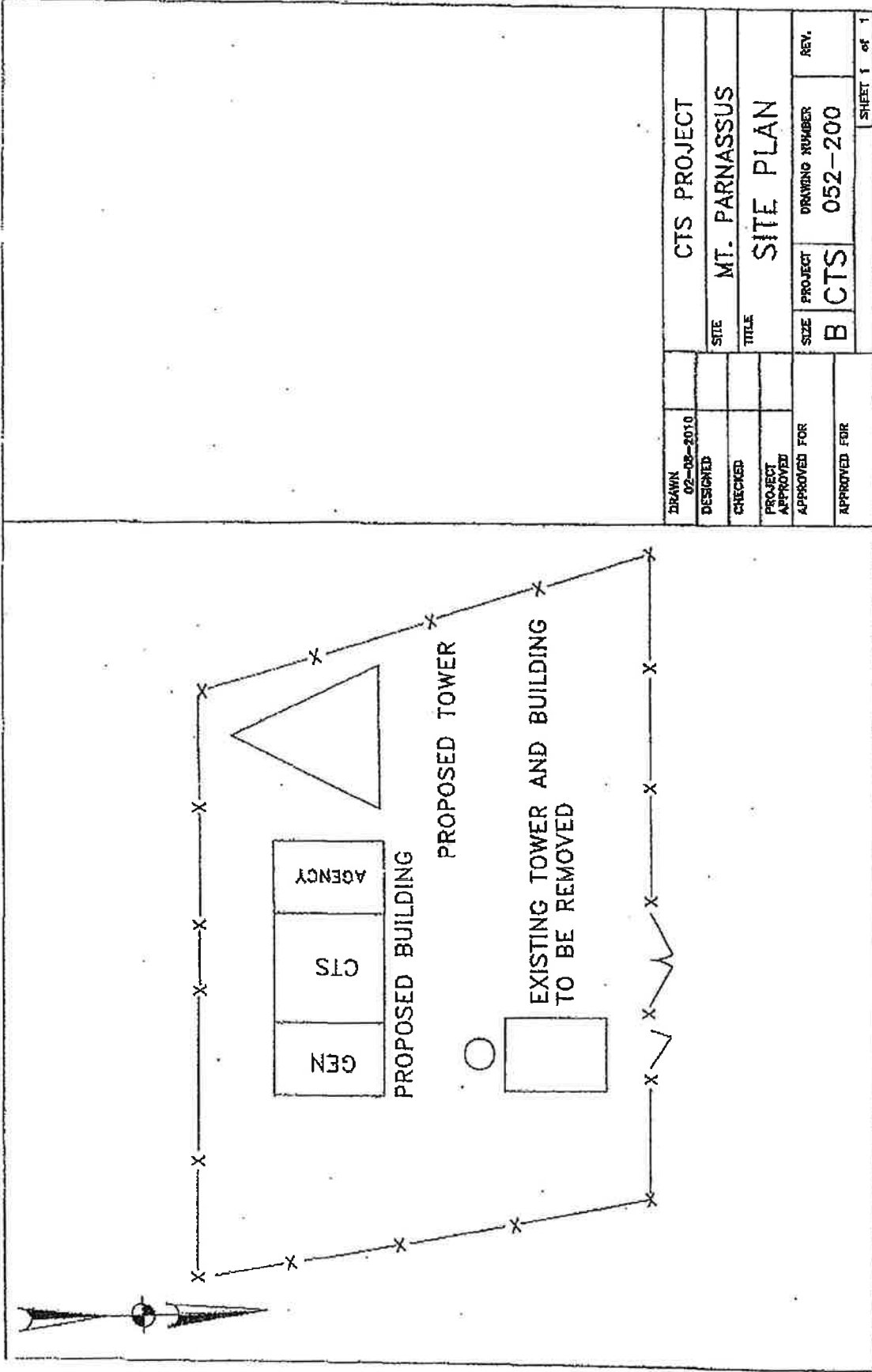
AGREED AND ACCEPTED BY:

DEPARTMENT OF TRANSPORTATION

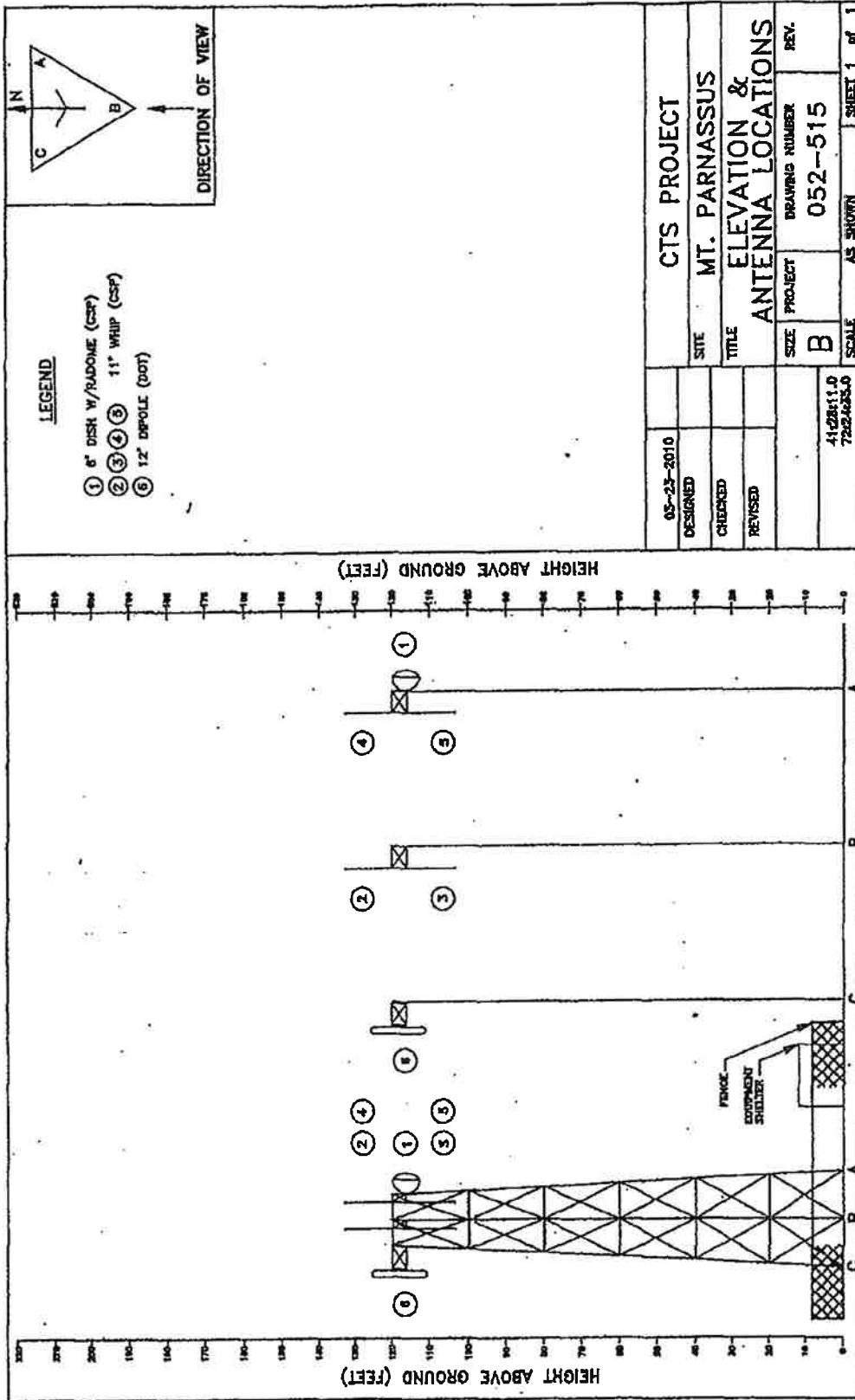
By: James Redeker Date 4/29/13
Commissioner

DEPARTMENT OF EMERGENCY SERVICES AND PUBLIC PROTECTION

By: Reuben F. Bradford Date 4-23-13
Commissioner



ATTACHMENT B



Attachment C

SITE	ANT	USER	USE	FREQ	TX	HGT	TWR	ANT	AZ	SZ	MANUF	MODEL	GAIN	CABLE	DESCRIPTION
52	1	CSP	MW-EASTLYME	6700	1	120B		133		6	CELWAVE	PA6-65		37 WEP65	DISH W/RADOME
52	2	CSP	MW-COLCHESTER	6700	1	120A		31		6	CELWAVE	PA6-65		37 WEP65	DISH W/RADOME
52	3	CSP	MW-HADDAM	6700	1	120C		251		6	CELWAVE	PA6-65		37 WEP65	DISH W/RADOME
52	4	CSP	K-800MHZ TX	866.275	25	120B				11	DECIBEL	DB-810		10 LDF7-50A	WHIP
52	5	CSP	K-800MHZ RX	821.275	0	120B				11	DECIBEL	DB-810		10 LDF7-50A	INVERTED WHIP
52	6	CSP	I-CALL TX	866.0125	25	120A				11	DECIBEL	DB-810		10 LDF7-50A	WHIP
52	7	CSP	I-CALL RX	821.0125	0	120A				11	DECIBEL	DB-810		10 LDF7-50A	INVERTED WHIP
52	8	DOT	OPS	47.30	100	120C				12	COMPROD	531-70		0 LDF5-50A	DIPOLE
52	9	ToEHaddam	OPS	46.18	110	100A				12	COMPROD	531-70		0 LDF5-50A	DIPOLE
52	10	ToEHaddam	OPS	153.8	35	100B				6	TELEWAVE	VHF-150		3 LDF5-50A	DUAL DIPOLE
52	11	ToEHaddam	OPS	46.58	50	100C				12	COMPROD	531-70		0 LDF5-50A	DIPOLE
			08-02-2010												

ATTACHMENT D

**DOT CIRCUITS
on CTS MICROWAVE NETWORK**

The following circuit on the CTS Microwave Network for the use of DOT will be provided end to end at the indicated locations and terminated on a demarcation block for DOT connections. Colchester location will be terminated as two (2) fractional T1 circuits for DOT's use.

CIRCUIT:

MT Parnassus (Site 52) to Colchester (Site 50)
Quantity One (1), Four Wire Circuit,
5250-DOT-01-4W

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SITE INSTALLATION AND APPEARANCE STANDARDS

1 PURPOSE

To provide for a policy of common quality in site installation and maintenance, it is necessary that there be a written definition of those things which affect both the technical performance of the site and its appearance. These standards are to be in effect for each and every licensor or licensee having equipment in, on or about the site where the right to occupy is granted by the license to which this document is an attachment.

It is not the intent of this document to set standards of excellence or other requirements that would make the use of the site costly or arduous, but to ensure a well defined mutually protecting level of installation and maintenance. A clear understanding of how equipment is to be installed and maintained by all licensors and licensees reduces the probability of impaired site performance due to a sub-standard installation.

Any and all proposed work shall be forwarded to the STATE POLICE for review. Details of the intended work shall be presented with State of Connecticut Professional Engineer approved engineered drawings. Upon written approval by the STATE POLICE, LICENSEE will be required to submit to the STATE POLICE a list of all contractors LICENSEE intends to employ to do the work and the contractors must have been authorized to do business under the laws of the State of Connecticut. The STATE POLICE will have final rights of approval for the engineering drawings and site contractors.

2 STATE AND NATIONAL STANDARDS

All installations must, at a minimum, be in conformance with the most current release of following State and National codes:

American National Standards Institute:

ANSI/BIA-222F

Structural Standards For Steel Antenna Towers And Antenna Supporting Structures

Federal Aviation Administration Regulations:

Title 14, Chapter I, Part 77

Objects Affecting Navigable Airspace

Advisory Circular
AC 70/7460-1K CHG 1

Obstruction Marking And Lighting

Advisory Circular
AC 1 50/5345-43,
FAA/DOD Specifications L-856

High Intensity Obstruction Lighting Systems

Federal Communications Commission Rules And Regulations:

Code Of Federal Construction, Marking And
Regulations Title 47 Lighting Of Antenna Structures
Chapter 1, Part 17

National Electrical Code
Building Officials And Code Administrators International, Inc.

Basic National Building Code

Basic National Mechanical Code

State Building Code, Connecticut Supplement To Boca

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National Fire Protection Association
CODE 101 Life Safety
CODE 90A - Air Conditioning And Ventilating Systems
CODE 110 - Emergency And Standby Power Systems

State Fire Safety Code, Connecticut Supplement To NFPA 101

Occupational Safety And Health Administration

Safety And Health Standards (29 CFR 1910) General Industry

Subpart R Special Industries

1910.268 Telecommunications

3. TOWER

This section deals with items which are to be mounted on, attached to or otherwise affixed to the tower.

3.1 ANTENNAS

3.1.1 MOUNTS

All antennas shall be mounted to the tower with standard commercial hardware manufactured for this purpose. The mounting hardware in all components shall meet the requirements of ANSI/EIA Standard 222F with simultaneous 90 mile an hour winds and ½" radial ice. The deflection limit shall be 0.75 degrees, maximum.

3.1.2 LOCATION

Antennas shall be mounted only at the heights, azimuths, with the standoffs and in the positions shown in the License Agreement to which this document is an attachment.

3.1.2.1 REPOSITIONING

Site users shall not relocate antennas from the positions shown in the licensing agreement nor install antennas additional to the agreement without the written approval of the licensor and the informing of all licensees. A relocation which causes a question as to the ability of the tower to bear the antenna in the new location and as well as all antennas listed in the site licensing agreement shall- require that a structural analysis be performed to ensure that there is no loss of tower capacity. The analysis shall be done at the expense of the site user desiring to move the antennas.

3.1.3 ADDITIONAL

It shall be the responsibility of the site user desiring to install any antenna or other device beyond those listed in the site licensing agreement to have done the structural analysis necessary to ensure that the "new" antenna does not exceed the capacity of the tower to bear. Under the "last man on" standard, the site user installing the "new" equipment shall be responsible for ensuring that it causes no interference problems and/or taking remedial action as to correct any problems caused by the "new" equipment. The STATE POLICE, as a primary tower user, shall be exempt from any requirement to resolve interference at STATE POLICE sites.

3.1.4 GROUNDING

The body of all antennas shall be bonded to the tower per Motorola Quality Standard R56.

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3.2 COMPONENTS AND DEVICES

All components and devices attached to the tower, amplifiers, filters etcetera, shall be attached with standard commercial hardware manufactured for the purpose. The use of tape, wire wrap, plastic ties, and similar material is not acceptable.

3.3 CLIMBING BOLTS AND LADDERS

All attachments made to the tower shall be made in such a manner as to not cause any restriction or present a safety hazard to any climbing ladders, leg step bolts or safety cables provided.

4.0 CABLE AND WAVEGUIDE

To reduce the probability of physical or lightning damage to antennas, cable and waveguide and equipment, the requirements for methods of attachment, routing and grounding are specific for the tower, bridge and shelter interior and are described in the following paragraphs. Only hardline will be acceptable.

4.1 EXTERIOR

This section will consider the horizontal routing of cable and waveguide via a bridge from the shelter to the tower and the vertical routing on the tower.

4.1.1 BRIDGE

No antennas are to be mounted on the bridge. A bridge with ice shield is provided between the shelter and the tower. Brackets are provided on this bridge for the support and routing of the cable and waveguide. In accordance with the manufacturer's recommendations for the spacing of supports on horizontal runs for the particular type of cable or waveguide, the cable or waveguide shall be secured to the brackets on the bridge using clamps and hardware specifically manufactured for that purpose. In lieu of a particular and specific recommendation from the manufacturer of the cable or waveguide, the recommendations of the latest version of Andrews Catalog 35 for similar type cable or waveguide shall be considered to be the minimum acceptable standard. No cable or waveguide run shall be clamped, tied or in any way affixed to a run belonging to another agency or user. The use of tape, wire wrap, plastic ties, and similar material is not acceptable.

4.1.2 TOWER

4.1.2.1 LADDER

A ladder is provided for the vertical routing of cable and waveguide. From the horizontal to vertical transition at the point where the bridge meets the tower to the point at which the cable or waveguide must leave the bridge to route to the antenna, all cable and waveguide is to be attached to the ladder in accordance with the recommendations of the manufacturer of the cable or waveguide. In lieu of a particular and specific recommendation from the manufacturer of the cable or waveguide, the recommendations of the latest version of Andrews Catalog 35 for similar type cable or waveguide shall be considered to be the minimum acceptable standard. No cable or waveguide run shall be clamped, tied or in any way affixed to a run belonging to another agency or user. The use of tape, wire wrap, plastic ties, and similar material is not acceptable.

4.1.2.2 DISTRIBUTION RUNS

Cable or waveguide runs, from the ladder to the point at which they mate to the antenna, shall be routed along tower members in a manner producing a neat and professional site appearance. They shall be specifically routed so as to not impede in any fashion the safe use of the tower leg climbing bolts nor to restrict the access of other tower users. Distribution runs shall be clamped to the tower in accordance with the recommendations of the manufacturer of the cable or waveguide. In lieu of a particular and specific recommendation from the manufacturer of the cable or waveguide, the recommendations of the latest version of Andrews Catalog 35 for similar type cable or waveguide shall be considered to be the minimum acceptable standard. No cable or waveguide run shall be clamped, tied or in

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SITE INSTALLATION AND APPEARANCE STANDARDS

anyway affixed to a run belonging to another agency or user. The use of tape, wire wrap, plastic ties, and similar material is not acceptable.

4.1.3 LENGTHS

Cable and waveguide runs shall not be excessive to the requirement. No coiled lengths shall be permitted on the tower, bridge or on the ground. The cable length of the finished run shall provide for normal maintenance and operation only.

4.1.4 ENTRY

Entry of the cable or waveguide, to the interior of the shelter, shall be via ports provided in the shelter wall. Cable or waveguide entering a port shall be provided with a boot to seal the port; the boot shall be a commercial product made specifically for the type of cable or waveguide and for the diameter of the entry port. It shall be installed in accordance with the instructions of the manufacturer and shall seal the port against the intrusion of moisture.

4.2 INTERIOR

As there may be more than one site user within a shelter area it is necessary that the routing of cable or waveguide provide for the needs of all occupants.

4.2.1 ROUTING

Trays are provided within the shelter for the routing of cable and waveguide to the various equipment racks and termination points. All cable and waveguide shall be placed and secured to the cable tray where possible. Where bend radii or other conditions do not permit the cable or waveguide to be tightly bound to the tray, it shall be placed and secured in a neat and professional manner, making full allowance for the needs of the other site users. Cable or waveguide that can not be bound to the tray shall be provided with standoffs and clamps to prevent its being a free moving hazard.

4.2.2 LENGTHS

Cable and waveguide runs in the shelter shall not have a length in excess of the requirement. While adequate slack for purposes of maintenance and operation is permitted, no coiled lengths on the tray or elsewhere in the shelter are permitted. In closed equipment racks the site user may dispose of excess lengths as desired, but it shall not protrude from the rack nor detract from the professional appearance of the site.

4.3 GROUNDING

Cable and waveguide shall be grounded as a minimum at three specific points, and for vertical runs in excess of 200 feet at intermediate points per Motorola Quality Standard R56.

4.3.1 ANTENNA

All cable and waveguide shall be grounded to the tower at the point where the run effectively breaks from the tower for its connection to the antenna, using clamps and hardware specifically manufactured for that purpose.

4.3.2 BRIDGE TRANSITION

On the vertical portion of the cable or waveguide run, just above where it starts to make its transition from a vertical tower to a horizontal bridge run, all cable and waveguide shall be grounded to the tower ground bar using clamps and hardware specifically manufactured for that purpose.

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4.3.3 SHELTER ENTRY

On the exterior of each shelter at a point near the entry ports, a grounding plate has been provided for terminating ground leads brought from the cable and waveguide. Each cable and waveguide run shall be grounded at this point using clamps and hardware specifically manufactured for that purpose.

4.3.4 INTERMEDIATE POINTS

On cable and waveguide installations where the vertical tower length exceeds 200 feet, the run shall be grounded at equally spaced intermediate points along the length of the run so as to not have a distance to a grounding point longer than 100 feet per Motorola Quality Standard R56.

4.3.5 GROUNDING POINTS

Cable and waveguide grounding leads shall connect to a separate point for each run; leads shall not be grouped to the common ground point per Motorola Quality Standard R56.

4.3.6 GROUNDING LEADS

Grounding straps shall be kept to a minimum length and as near as possible to vertical down lead and shall be consistent with the restraints of protective dress and access per Motorola Quality Standard R56.

5.0 SHELTER

Floor and wall space within the shelter has been established using information received from the various site users. While some measure of expansion has been provided, any user desiring to increase its use of floor space and/or rack space within the shelter must obtain written approval from the licensor.

For the protection of the interest of all current and future site users, all equipment layout should be done with the intent of 'Economy Of Space'.

5.1 FLOOR SPACE

The floor plans for shelter layout are part of the licensing agreement and must be adhered to by each site user. Variance from the floor plan must have the prior written approval of the licensor.

5.2 WALL SPACE

No provision has been made for the mounting, or otherwise affixing, of user equipment to the walls of the multiple users spaces of the shelter. Any use of the wall space for the temporary or permanent installation of any equipment or device shall require the prior written approval of the licensor as to type of equipment, space to be used and method of attachment.

5.3 RACKS

All racks and equipment are to be plumb and true with the walls and floor of the shelter and reflect an installation consistent with the electrical and operational requirements of the equipment and the appearance standards of a professional installation. Racks are to be bolted to the floor and aligned on the center line as in the site drawing provided by the licensor. Racks are not to be attached to the cable trays.

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5.4 INTERCONNECTION CABLES

All communications and interconnection cabling between equipment and/or distribution frames, (microwave, PSTN, or other demarcation points) shall be placed in provided cable trays and secured to the tray in a neat, orderly and professional manner.

6.0 ELECTRICAL

The electrical supply and distribution system has been designed on data supplied by the individual site users. All equipment shall be 120 VAC @ 15 AMPS maximum, except with prior written approval of the licensor.

6.1 SIZING

The breaker panels and breakers have been sized to provide for the loads as defined in the data obtained from the site users and contained as an attachment to the site licensing agreement for each site user. Changes in loads, either in current draw or phase distribution of the load, shall be made only with the prior written approval of the site licensor.

6.1 .1 TEMPORARY LOADS

Test equipment, soldering irons or other equipments serving a test or repair function may be connected to one of the service outlets; providing that the total load connected to any single dual receptacle does not exceed 15 AMPS. Equipment to be in place for more than 7 days will require prior written approval of the licensor.

The above paragraph applies only to site users obtaining power from the STATE POLICE provided distribution system.

6.2 DISTRIBUTION

Within STATE POLICE provided or controlled spaces wiring from the distribution breaker panel is provided to the rack location and terminated at the cable tray with a twist lock receptacle. From this point each agency may select how to distribute to its equipment or rack.

6.3 GROUNDING

In each room a halo grounding system is provided for access to the site grounding system. Each rack shall have a properly sized, ground lead from the rack safety and signal grounds the closest point of the halo ground system. Each rack shall be separately grounded per Motorola Quality Standard R56.

6.4 BATTERY SYSTEMS

Installation of equipment utilizing battery systems shall be made only with the prior written approval of the site licensor and be included in the licensee's agreement, batteries shall only be installed in cases and racks approved by the licensor. Any battery system installation in a STATE POLICE controlled space that has not been previously equipped with an approved eyewash station shall include such eyewash station as part of the installation. The eyewash station shall be self contained, gravity flow, wall hung, with a sixteen (16) gallon capacity. The station shall meet ANSI z358.1 requirements for refillable personal eyewash units. The maintenance and current date code of the supplied eyewash station is the responsibility of the licensee.

7.0 HEATING, VENTILATING AND AIR CONDITIONING

A controlled environment is provided for the equipment spaces by a redundant air conditioning system; this system has been sized to provide for the heat loads obtained from the equipment lists provided by the various site users. Additional equipment or equipment having a greater heat dissipation requirement than that specified in the licensing agreement can not be installed without the prior written approval of the licensor.

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SITE INSTALLATION AND APPEARANCE STANDARDS

7.1 SYSTEM INTEGRITY

Opening of the shelter to the effects of outside air flow can have a negative effect on the ability of the system to maintain temperature and humidity; every effort should be made to reduce the amount of time that doors or other wall entries are kept open.

7.2 DOORS

Except when actually moving equipment in or out, the shelter doors shall not be latched or otherwise held or kept open.

8.0 SITE APPEARANCE

Services to maintain the appearance and integrity of the site will be provided by the licensor and will include scheduled cleaning of the shelter interiors; this does not include janitorial services for the licensees, and each site licensee is expected and required to remove from the site all trash, dirt and other materials brought into the shelter, or onto the site during their installation and maintenance efforts.

8.1 STORAGE

Within STATE POLICE provided or controlled spaces no parts or material may be stored on site by licensees.

9.0 DAMAGE

Damage to any item of the site facility or structure or to a component or equipment of a site licensee or licensor whether caused or detected by installation, maintenance or other activities shall be reported to the licensor immediately.

10. SITE ACCESS

10.1 ACCESS CONTROL

To ensure that only authorized personnel are accessing the site, licensees shall be required to, inform the licensor and Network Control Center (NCC) of personnel and/or maintenance organizations they are requesting authorization to enter the site as the licensee's agent.

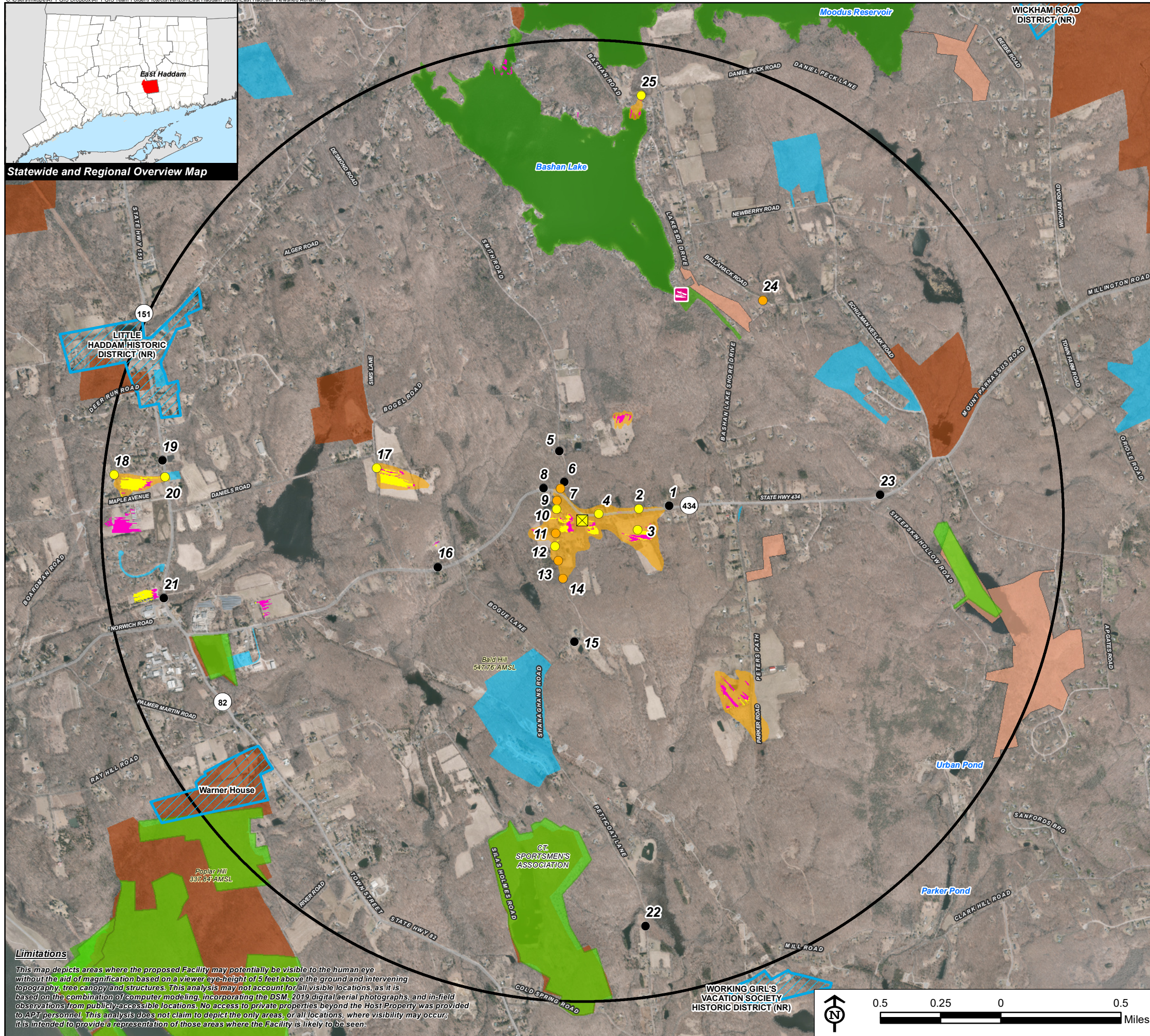
10.2 REPORTING ON SITE

To ensure that only authorized personnel are on site, an orderwire system is installed in each room to allow communications with the Network Control Center (NCC). Personnel on site shall be required to communicate with the network control center and report their arrival on site, identity, purpose, expected and actual departure times.

10.3 IDENTIFICATION

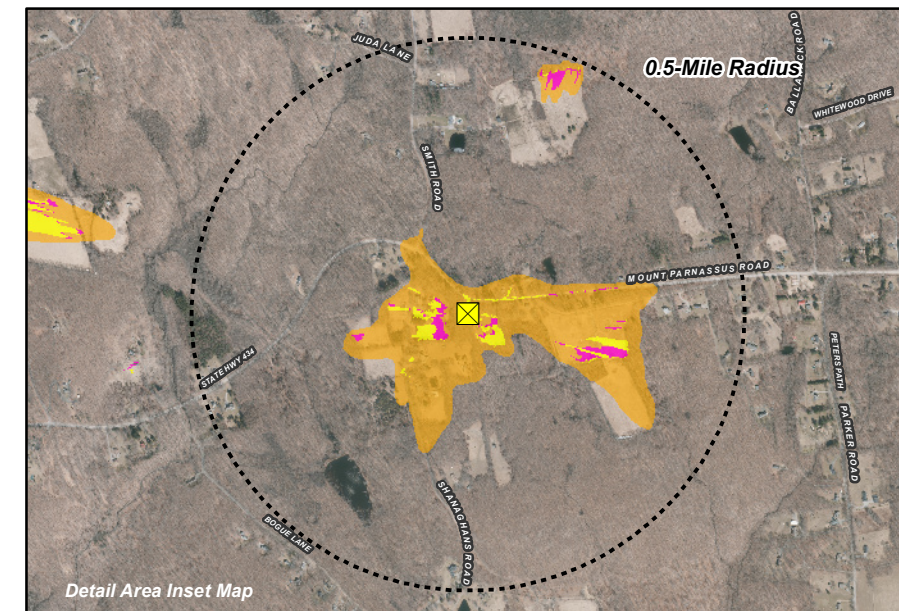
Each user shall post a current license on all equipment. Licenses shall also post the name and 24 hour phone number and agency contact in case of an emergency

ATTACHMENT 3



Statewide and Regional Overview Map

Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating the DSM, 2019 digital aerial photographs, and in-field observations from publicly accessible locations. No access to private properties beyond the Host Property was provided to APT personnel. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.



Comparative Viewshed Analysis Map

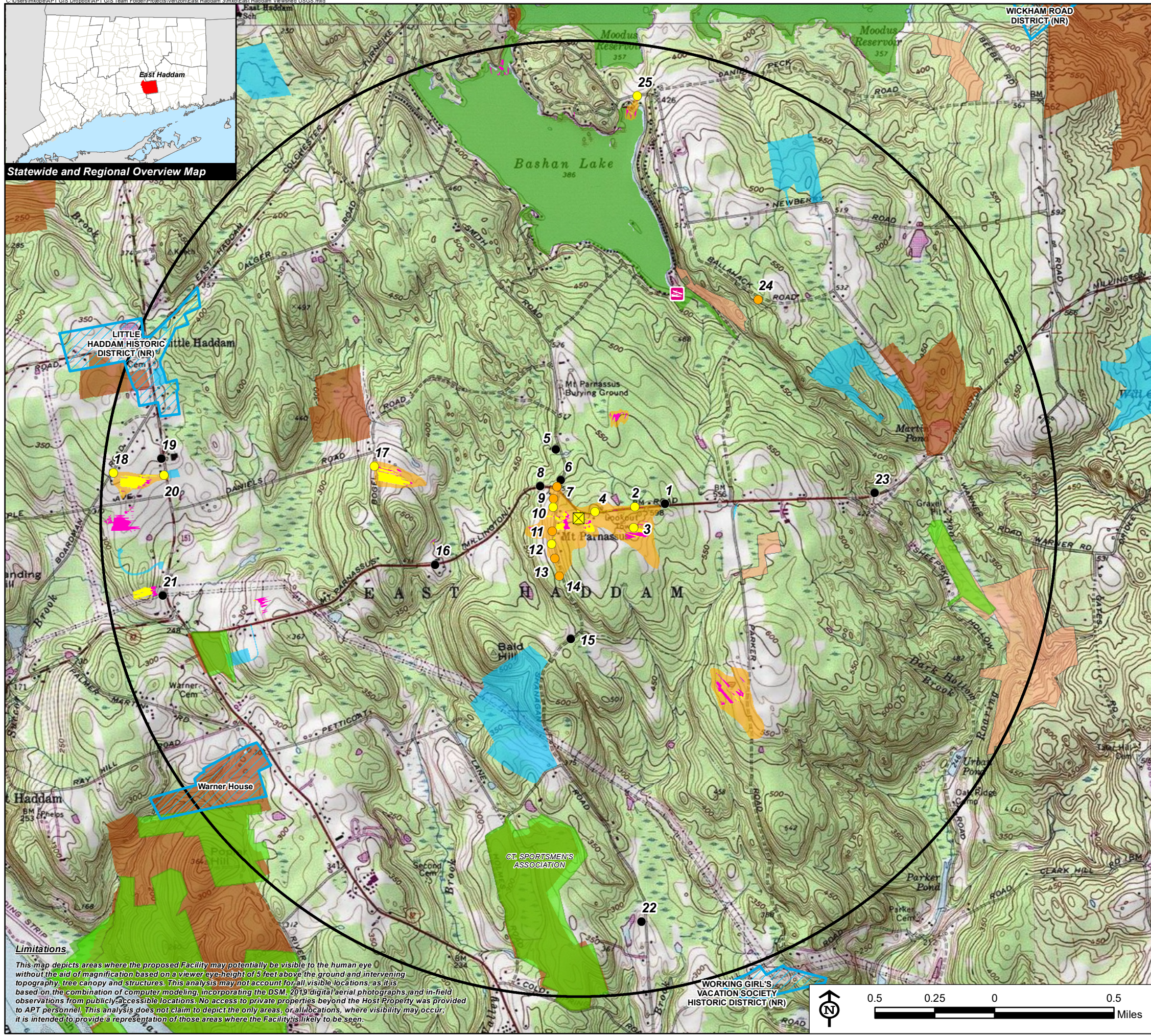
Proposed Wireless Telecommunications Facility Extension East Haddam 3 CT 194 Mount Parnassus Road East Haddam, Connecticut

Existing facility height is 121 feet AGL; Proposed facility height is 161 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Existing conditions field verified by APT on January 30, 2024
 Base Map Source: 2019 Aerial Photograph (CTECO)
 Map Date: February 2024

- Legend**
- Facility Location
 - Study Area (2-Mile Radius)
 - Year-Round Visibility of Existing Tower at 121' AGL (12 Acres)
 - Additional Year-Round Visibility 161' AGL (11 Acres)
 - Areas of Potential Seasonal Visibility - Existing and Proposed (94 Acres)
 - Photo Locations (January 30, 2024)
 - Not Visible
 - Seasonal
 - Year-Round Visibility
 - Trail
 - Scenic Highway
 - DEEP Boat Launches
 - National Register District
 - Municipal and Private Open Space Property
 - State Forest/Park
 - Protected Open Space Property**
 - Federal
 - Land Trust
 - Municipal
 - Private
 - State

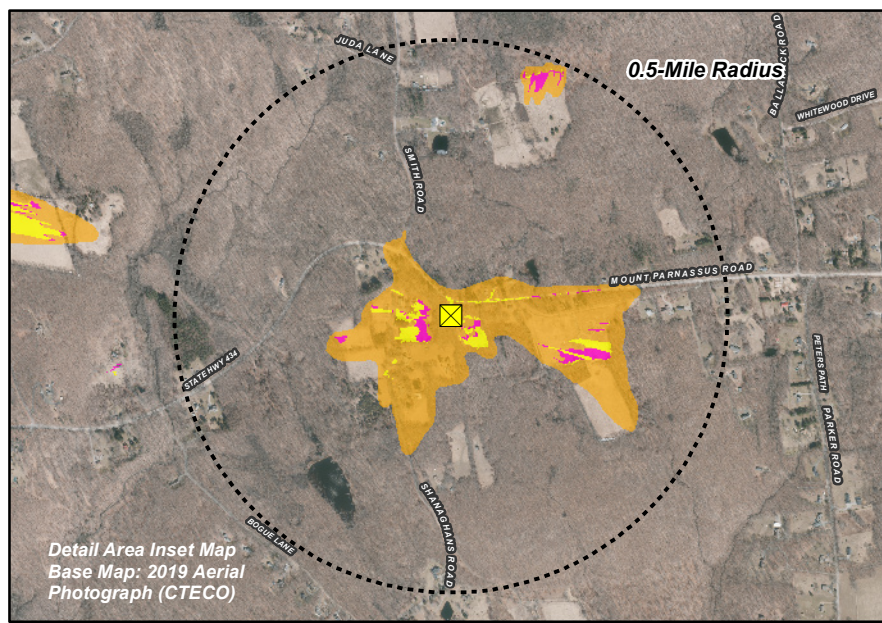
Data Sources:
Physical Geography / Background Data
 A digital surface model (DSM) was created from the State of Connecticut 2016 LiDAR LAS data points. The DSM captures the natural and built features on the Earth's surface.
 Municipal Open Space, State Recreation Areas, Trails, County Recreation Areas, and Town Boundary data obtained from CT DEEP.
 Scenic Roads: CTDOT State Scenic Highways (2015); Municipal Scenic Roads (compiled by APT)
Dedicated Open Space & Recreation Areas
 Connecticut Department of Energy and Environmental Protection (DEEP): DEEP Property (May 2007; Federal Open Space (1997); Municipal and Private Open Space (1997); DEEP Boat Launches (1994)
 Connecticut Forest & Parks Association, Connecticut Walk Books East & West
Other
 CTDOT Scenic Strips (based on Department of Transportation data)

Notes
 **Not all the sources listed above appear on the Viewshed Maps. Only those features within the scale of the graphic are shown.



Statewide and Regional Overview Map

Limitations
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Detail Area Inset Map
 Base Map: 2019 Aerial Photograph (CTECO)

Comparative Viewshed Analysis Map

Proposed Wireless Telecommunications Facility Extension East Haddam 3 CT 194 Mount Parnassus Road East Haddam, Connecticut

Existing facility height is 121 feet AGL; Proposed facility height is 161 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Existing conditions field verified by APT on January 30, 2024
 Base Map Source: USGS 7.5 Minute Topographic Quadrangle Map, Colchester, CT (1984), Deep River, CT (1971), Hamburg, CT (1973), and Moodus, CT (1984)
 Map Date: February 2024

Legend

- Facility Location
- Study Area (2-Mile Radius)
- Year-Round Visibility of Existing Tower at 121' AGL (12 Acres)
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Data Sources:

Physical Geography / Background Data
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