



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 17, 2024

Kenneth C. Baldwin, Esq.
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RE: **PETITION NO. 1616** – Cellco Partnership d/b/a Verizon Wireless petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed extension and modifications to an existing Connecticut Department of Emergency Services and Public Protection-owned telecommunications facility and installation of associated telecommunications equipment located at 194 Mount Parnassus Road, East Haddam, Connecticut. **Council Interrogatories to Petitioner.**

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 7, 2024. 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 June 7, 2024 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 A. Bachman
Executive Director

MAB/dll

Petition No. 1616
Cellco Partnership d/b/a Verizon Wireless
194 Mount Parnassus Road
East Haddam, Connecticut

Interrogatories
May 17, 2024

Notice

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

Project Development

4. What is the estimated cost of the proposed project?
5. How does the estimated cost of the proposed project compare generally with the costs to construct a new facility?
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?

Existing Facility Site

7. Referencing Petition p. 2 and Attachment 9, what state agency (or agencies) owns and operates the existing facility?
8. What is the current lighting scheme at the existing facility site? During what hours and for what activities is it employed?
9. What is the mesh size of the existing perimeter fence?
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?
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?
12. Referencing Petition No. 1130, Exhibit 1, available at the following link - [pe1130_filing_statepolice_easthaddam.pdf \(ct.gov\)](https://www.ct.gov/deep/oc/p1130_filing_statepolice_easthaddam.pdf) – 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?

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.

Existing Facility

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

Proposed Facility Extension and Associated Equipment

17. Does Cellco have a lease for the tower extension, equipment installation and required ground space?
18. Would the state assume ownership and/or management of the tower extension after construction?
19. Referencing Petition Attachment 4, Sheet Z-1, what are the dimensions of the proposed fence expansion area?
20. Referencing Petition Attachment 4, Sheet Z-2, what is the significance of the “4' CLR” note in the expanded fence area?
21. Could the proposed extended facility and existing foundations accommodate an additional increase in height? Explain.
22. Could the proposed extended facility support additional tenants? If so, at what levels?
23. Have any other carriers expressed an interest in locating at the proposed extended facility?
24. Would the proposed lattice tower extension match the existing lattice tower (ex. finish, cross-arm pattern)?
25. What type of maintenance would be required for the proposed lattice tower extension?

Proposed Wireless Services

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

27. When did Cellco discover a need for service in the surrounding area?
28. Approximately when did Cellco establish a search ring?
29. Were other potential sites considered for the proposed Cellco installation? If so, please identify the other potential sites and why they were rejected.
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.
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.
32. Would the proposed extended facility interact with the proposed telecommunications facility that is the subject of Council Docket No. 520? Explain.

Emergency Backup Power

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

Public Health and Safety

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.
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.
39. Would Cellco's proposed equipment installation be capable of supporting text-to-911 service? Is additional equipment required for this purpose?
40. Would Cellco's proposed installation comply with federal E911 requirements and the intent of the Warning, Alert and Response Network of 2006?

41. What measures are existing and proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, etc.)
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?
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?
44. Would cumulative operation of the noise-generating equipment at the extended facility site comply with state noise standards at the property lines?
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?
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.

Extended Facility Construction

47. Provide typical construction workdays and hours, and the anticipated duration of construction.
48. Could Cellco install its meter and utility equipment at a location within the existing compound rather than extend the existing compound and fence?
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.

Environmental Effects and Mitigation Measures

50. Referencing Petition Attachment 6, the maps on the last two pages are cutoff. Please re-submit the maps on larger sized paper.
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?
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.
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)
54. Is the existing facility site located in a DEEP Natural Diversity Database buffered area?

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.
56. Referencing Petition Attachment 4, Sheet Z-2, what is the total limit of disturbance for the proposed fence extension area?
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?
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.
59. Identify the nearest “Important Bird Area” as designated by the National Audubon Society.
60. What is the propensity for avian nesting and perching on the proposed extended facility? How would this be managed?
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>)