Robinson+Cole

KENNETH C. BALDWIN

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Also admitted in Massachusetts and New York

September 18, 2025

Via Electronic and U.S. First-Class Mail

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

Re: Petition No. 1677 – Cellco Partnership d/b/a Verizon Wireless Petition for a Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for Modifications to an Existing Telecommunications Facility and Installation of Associated Equipment at 323 Route 81, Killingworth, Connecticut

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless ("Cellco"), enclosed please find the original and fifteen (15) copies of Cellco's Responses to Council Interrogatories related to Petition No. 1677. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Kenneth C. Baldwin

Kunie gmu

Enclosure

32969038-v1

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

.

A PETITION OF CELLCO PARTNERSHIP : PETITION NO. 1677

D/B/A VERIZON WIRELESS FOR A

DECLARATORY RULING FOR

MODIFICATIONS TO AN EXISTING

TELECOMMUNICATIONS FACILITY AND

INSTALLATION OF ASSOCIATED

EQUIPMENT AT 323 ROUTE 81,

KILLINGWORTH, CONNECTICUT : SEPTEMBER 18, 2025

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

On September 2, 2025, the Connecticut Siting Council ("Council") issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless ("Cellco"), relating to Petition No. 1677 (the "Petition"). Below are Cellco's responses.

Notice

Question No. 1

Referencing Petition p. 4 and Attachments 5, 6 of the Petition, has Cellco Partnership d/b/a Verizon Wireless (Cellco) received any comments since the Petition filing? If so, please summarize the comments.

Response

Pursuant to Council regulations, a copy of this Petition and notice of its filing was sent to Killingworth Municipal Officials, the property owner (the Town of Killingworth) and the tower owner. Notice of the filing of this Petition was also sent to abutting property owners. Cellco has not received any comments from anyone since Petition No. 1677 was filed with the Council.

Project Development

Question No. 2

How does this Petition relate to Cellco's May 2025 tower share request (TS-VER-070-250523) at this site that was withdrawn on July 9, 2025?

Response

The site modifications proposed in TS-VER-070-250523 are identical to the modifications described in Petition No. 1677. The Petition No. 1677 filing however, acknowledges that the proposed modifications described will result in an expansion of the site's leased boundary to accommodate Cellco's generator and propane fuel tank.

Question No. 3

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.

Question No. 4

What is the estimated cost of the proposed modifications? Provide itemized cost estimates.

Response

Cellco estimates the Project costs to be approximately \$250,000.

Question No. 5

How would Cellco recover the cost of the proposed modifications?

Response

Cellco's costs associated with providing its customers with wireless service, including the

cost for development of network infrastructure, are paid for by the individuals, corporations and government entities that purchase the providers' wireless service.

Exiting Facility and Site

Question No. 6

What is the acreage of the host parcel? Describe the current uses of the host parcel, the types of existing structures, driveways and access points.

Response

The host parcel contains 42.5 acres and is the home of several municipal service buildings including the Town's DPW Garage, Town Hall, Transfer Station, the Town library, and the Killingworth Fire Department. The existing tower is located behind and east of the Fire Department station house. The parcel maintains multiple points of access to Route 81 (Higganum Road) along its frontage.

Question No. 7

What are the uses of the parcels in the surrounding area of the existing facility and site?

Response

The surrounding parcels support a mix of commercial (auto repair shop) and low-density residential uses and the Killingworth Elementary School located to the northwest.

Question No. 8

What is the square footage of the existing equipment compound?

Response

The existing equipment compound contains 2,840 square feet.

Question No. 9

What is the height of the existing chain link fence?

Response

The existing chain link fence is eight (8) feet tall.

Question No. 10

What is the distance and direction of the centerline of the existing self-supporting lattice tower from the nearest building located on the host parcel. What is the use of the building?

Response

The nearest building to the existing Fire Department tower is the Fire Department stationhouse, located approximately 54 feet to the west.

Question No. 11

Provide the distance, direction and address of the nearest residential property line from the centerline of the existing self-supporting tower.

Response

The nearest residential property line is located approximately 245 feet to the west at 326 Route 81, in Killingworth.

Question No. 12

Provide the distance, direction and address of the nearest residential structure from the centerline of the existing self-supporting lattice tower.

Response

The nearest residential structure is located approximately 330 feet to the west at 326 Route 81, in Killingworth.

Proposed Facility Modifications and Associated Equipment

Question No. 13

Provide the distance, direction and address of the nearest residential property line from Cellco's proposed new lease area.

Response

The nearest residential property line from Cellco's new leased area is located approx. 270 feet to the west at 326 Route 81, in Killingworth.

Question No. 14

Submit a Compound Plan, Tower Elevation and Mounting Configuration Drawing for the proposed facility modification and associated equipment.

Response

See Attachment 1.

Question No. 15

Provide the area and dimensions of Cellco's proposed generator concrete pad.

Response

Cellco's generator concrete pad is 4' x 10' (40 square feet).

Proposed Wireless Services

Question No. 16

Provide the coverage footprint in square miles and list the main roads that would have reliable service from the proposed modification.

Response

	Neg 85	Neg 95
700MHz	1.02 sq mi	4.66 sq mi
850MHz	0.65 sq mi	2.71 sq mi
1900MHz	0.15 sq mi	0.89 sq mi
2100 MHz	0.08 sq mi	0.25 sq mi
3700MHz	0.13 sq mi	0.45 sq mi

The proposed site would provide Cellco customers with reliable service along portions of Route 81, Route 80, Roast Meat Hill Road and Reservoir Road. The site would also improve wireless service to the Beechwood Elderly Housing Community to the north of the municipal

tower site.

Question No. 17

Is the proposed Cellco modification for coverage, capacity or both?

Response

The proposed Killingworth 3 site is a coverage site.

Public Health and Safety

Question No. 18

Could the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure on the host parcel? If so, identify any measures that would be employed to protect these existing utilities or infrastructure from impact or interference.

Response

The Petitioners will work closely with the Town and the site contractor to avoid any impact on existing site utilities and infrastructure. All utilities and other site infrastructure would be located, marked and protected prior to the start of construction. Final construction design documents and property surveys will incorporate the locations of all existing utilities and site infrastructure and will utilize Connecticut CBYD services to locate existing utilities.

Question No. 19

Would the proposed equipment installation be capable of supporting text-to-911 service and comply with federal E911 requirements and the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 20

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

Response

The existing tower and carrier equipment shelters are surrounded by an eight (8) foot tall chain link security fence and gate. The gate is locked with access limited to the wireless carriers sharing the tower, Valley Shore Communications and the Town. Cellco's wireless equipment will be located inside a room in the existing shelter with a locked door. The equipment will also maintain separate silent intrusion alarms, which are monitored remotely.

Question No. 21

Would any lighting be installed? If so, what would it be used for? Would it be on all the time, have a motion sensor or work on a preset timer?

Response

There is an existing exterior light above the door to Cellco's equipment shelter space and lighting inside Cellco's equipment room. No lighting is proposed near the new generator and propane fuel tank.

Question No. 22

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

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.
- 2020 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 Act (OSHA).

Question No. 23

Would the operation of Cellco's proposed equipment comply with Department of Energy and Environmental Protection (DEEP) Noise Control Standards at the property boundaries?

Response

Yes.

Question No. 24

In the event of a fire at the facility, how would power be turned off to de-energize the facility, and what fire safety and management systems exist at the site?

Response

Cellco can shut down its radio equipment and emergency backup generator remotely from its Mobile Telephone Switching Office in Wallingford, CT. Commercial power to the facility can be shut down manually at the main electrical backboard.

Question No. 25

How would Cellco ensure the proposed modifications will not adversely impact operations at the host parcel?

Response

The Petitioner will work cooperatively with the Town to ensure there is no impact on operations and services at the property, particularly those provided from the Killingworth Fire Department. Construction activity associated with Cellco's modifications will be restricted to

the rear portion of the parcel not currently utilized for parking or vehicle traffic. Construction will typically occur between the hours of 7 a.m. and 5 p.m. Monday to Saturday.

Emergency Backup Power

Question No. 26

How long would the proposed emergency backup generator run before refueling is required in the event of a power outage?

Response

Cellco is proposing to install 50-kW backup generator. The generator can run for approximately 112 hours at 100% load before refueling would be required.

Question No. 27

Would the backup generator run periodically for maintenance purposes? If so, at what frequency and duration? Would this be scheduled for daytime hours?

Response

Cellco generators are "exercised" once every two-weeks for approximately 20 minutes, during the daytime hours. Specific times can be scheduled if required.

Question No. 28

Would the site include a backup battery system in the event the emergency backup generator failed to start? If so, how long would the battery system provide power?

Response

Yes, Cello will install a battery cabinet with its equipment which would support cell site operations for up to 8 hours if its generator fails to start and commercial power is interrupted.

Environmental Effects and Mitigation Measures

Question No. 29

Characterize the anticipated visibility of the proposed expanded lease area as compared to the existing facility site from the surrounding area.

Response

The proposed lease area expansion area, measuring approximately 39 feet by 23 feet, will accommodate five protective bollards, a propane tank on a small concrete pad, and a backup generator. Based on field reconnaissance to assess visibility of the existing compound expansion area from the surrounding area and analysis of the proposed ground facility as exhibited in the photo-simulation provided in <a href="https://doi.org/10.21/20.21

Question No. 30

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

Response

The nearest wetland on the subject property is located approximately 470 feet to the southeast. This wetland is a forested headwater system with an associated intermittent watercourse that drains to the southeast away from the proposed facility. Please see <u>Attachment 3</u> Wetland Desktop Review for further details.

Question No. 31

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

Response

The existing facility is not located in a NDDB buffered area based on a review of the most recent June 2025 NDDB Map. The nearest NDDB buffered area is located approximately 0.95 miles to the northwest.

Question No. 32

Is Route 81 in Killingworth a scenic road or byway?

Response

Route 81 in Killingworth is not designated as a state scenic road or a national scenic byway.

Question No. 33

Would any vegetative clearing be required for the proposed modifications? Provide the number of trees with diameters of six inches or greater at breast height that would be removed, if any.

Response

No. Cellco's new leased area would be located in a cleared area adjacent to an existing parking lot.

Question No. 34

Estimate the amount of cut and fill required for construction of the additional lease area.

Response

Cut - 0 CY

Fill - 0 CY.

Project Construction

Question No. 35

When would construction commence, and when would construction be completed?

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

Response

Construction of Cellco's improvements would commence shortly after receiving Council approval and would be completed within 8 to 12 weeks. Construction will typically occur between the hours of 7 a.m. and 5 p.m. Monday to Saturday.

ATTACHMENT 1



WIRELESS COMMUNICATIONS FACILITY

KILLINGWORTH 3 CT 323 ROUTE 81 KILLINGWORTH, CT

	SITE DIRECTIONS					
ı	FROM:	20 ALEXANDER DRIVE WALLINGFORD, CONNECTICUT	TO:	323 ROUTE 81 KILLINGWORTH, CONNECTICUT		
1. 2. 3. 4. 5. 6.	TAKE FIRST TURN SLIGH TURN RIGHT STAY STRAIN	HEADING NORTH ON ALEXANDER RIGHT ONTO BARNES INDUSTRIAT LEFT ONTO DURHAM RD/CT-1 ONTO MAIN ST/CT-17; ONTO GO ONTO MADISON RD/ONTO CT-148. CONTINUE TO F	AL RD; 68. CONTINUE CT-79. CONTI	TO FOLLOW CT-68;	0.2 0.1 2.7 4.3 0.8 2.6	MI MI MI MI
7. 8.						

GENERAL NOTES

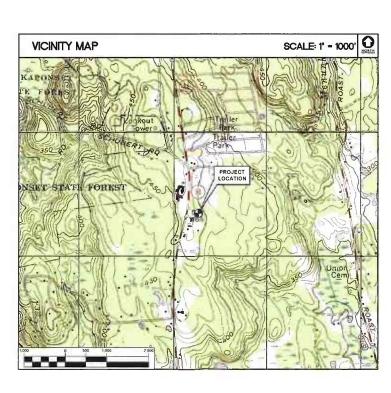
PROPOSED ANTENNA LOCATIONS AND HEIGHTS PROVIDED BY CELLCO PARTNERSHIP

ALL WORK SHALL BE IN ACCORDANCE WITH THE 2021 INTERNATIONAL BUILDING CODE AS MODIFIED BY THE 2022 CONNECTICUT SUPPLEMENT, INCLUDING THE TA/EA-222 REVISION "H" "STRUCTURAL STANDARDS FOR STELL ANTENNA TOWERS AND SUPPORTING STRUCTURES." 2022 CONNECTICUT FIRE SAFETY CODE, NATIONAL ELECTRICAL CODE AND LOCAL CODES.

PROJECT SCOPE

- THE PROPOSED SCOPE OF WORK AT THE EXISTING UNMANNED TELECOMMUNICATIONS FACILITY GENERALLY INCLUDES THE FOLLOWING:

- B. AT THE EXISTING EQUIPMENT ROOM:
- . INSTALLATION OF A (2) EQUIPMENT CABINETS HOUSING RADIO EQUIPMENT AND BATTERIES. . INSTALLATION OF A WALL MOUNTED HVAC UNIT AND ASSOCIATED UTILITY EQUIPMENT.
- INSTALLATION OF PROPANE FUELED EMERGENCY BACKUP POWER GENERATOR AND 500 GALLON PROPANE TANK AND ASSOCIATED BOLLARDS AS NEEDED.



PROJECT SUMMARY	
SITE NAME:	KILLINGWORTH 3 CT
SITE ADDRESS:	323 ROUTE 81 KILLINGWORTH, CT 06419
PARCEL ID:	24-07
PROPERTY OWNER:	SPRINGWICH CELLULAR LIMITED PARTNERSHIP M.A.: 754 PEACHTREE ST NE ATLANTA, GEORGIA 30308
TOWER OWNER:	VALLEY SHORE
LESSEE/TENANT:	CELLCO PARTNERSHIP d.b.a. VERIZON WIRELESS 20 ALFXANDER ORIVE WALLINGFORD, CT 06492
VERIZON SITE ACQUISITION CONTACT:	CHRISTINA GLASS SAI COMMUNICATIONS (603)212-6238
LEGAL/REGULATORY COUNSEL:	KENNETH C, BALDWIN, ESQ. ROBINSON & COLE LLP (860) 275-8345
TOWER COORDINATES:	LATITUDE: 41"-22'-10.092" LONGITUDE: 72"-33'-51.228" GROUND ELEVATION: 462.65'± A.M.S.L.
	COORDINATES AND GROUND ELEVATION ARE REFERENCED FROM FAA 2-C CERTIFICATION PREPARED FOR VERIZON WIRELESS BY CENTEK REGINEERING, DATED 10/21/2021. CENTEK PROJECT NUMBER: 20083.09

SHT. NO.	DESCRIPTION	REV NO.
T-1	TITLE SHEET	4
C-1	ABUTTERS MAP	4
C-2	COMPOUND PLAN, ELEVATION AND ANTENNA MOUNTING CONFIGURATION	4

	PROFESSIONAL ENGINEER SEAL					
	THINING THE	+	08/20/25	ZRKW	TJR	ISSUED FOR CT SMING COUNCIL - REVISED PER NEWLY ISSUED RFDS
	LINOS CONNESSES	3	06/30/25	DMD	SFG	ISSUED FOR CT SITING COUNCIL - GROUND LEASE AREA ADDED
1	Charles of control	2	05/09/25	TJR	SFG	ISSUED FOR CT STING COUNCIL - REVISED PER CLIENT COMMENTS
PLIVOL	2000年の日本	-	10/04/24	TJR	SFG	ISSUED FOR CT SITING COUNCIL - REVISED GENERATOR LOCATION
1011	The state of the	0	10/17/23	BSP	TJR	ISSUED FOR CT SMING COUNCIL — REVISED CABINET QUANTITY
	The Marine of the	د	09/13/23	BSP	TJR	ISSUED FOR CT SITING COUNCIL — CLIENT REVIEW PER REVISED RFDS
	" Common of the	A	10/21/21	DMD	TJR	ISSUED FOR CT SITING COUNCIL - CLIENT REVIEW PER REVISED RFDS
)	THE PROPERTY OF	<	11/13/20	DMO	TJR	ISSUED FOR CT SITING COUNCIL - CUENT REVIEW
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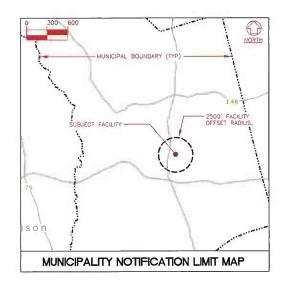
CT က

KILLINGWORTH

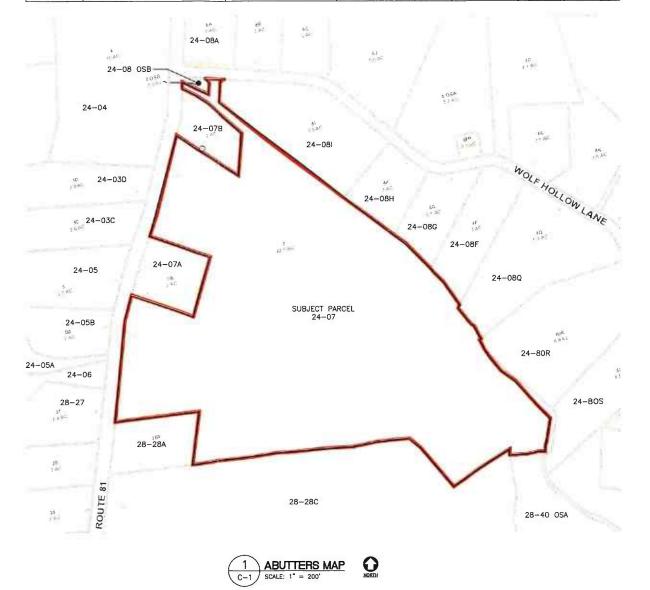
SCALE: AS NOTED JOB NO. 20083.09

TITLE SHEET

T-1



PARCEL_ID	OWNER	MAILING ADDRESS	CITY	STATE	ZIP CODE	STREET ADDRESS
24-07A	ALBRECHT KEVIN	319 ROUTE 81	KILLINGWORTH	C1	06419	319 ROUTE 81
24-08A	ANZIANO RICHARD J & SUZANNE G	4 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	4 WOLF HOLLOW LANE
24-058	DONADIO RICHARD P & MARILEE	318 RT 81	KILLINGWORTH	CT	06419	318 ROUTE 81
28-80S	ELLIOTT TIMOTHY & PEARL BACK	57 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	57 WOLF HOLLOW LANE
24-05A	FLYNN SUSAN R	P O BOX 953	KILLINGWORTH	C1	06419	314 ROUTE 81
24-08F	KEYES THOMAS A JR & NANCY D	33 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	33 WOLF HOLLOW LANE
24-07B	KILLINGWORTH AMBULANCE	P O BOX 749	KILLINGWORTH	CT	06419	335 ROUTE 81
28-40 OSA	KILLINGWORTH LAND CONSERVATION TRUST INC	P 0 BOX 825	KILLINGWORTH	CT	06419	PATRICK DRIVE
24-08 OSB	KILLINGWORTH TOWN OF	323 ROUTE 81	KILLINGWORTH	CI	06419	WOLF HOLLOW LANE
28-28A	KILLINGWORTH TOWN OF	323 ROUTE 81	KILLINGWORTH	CT	06419-1298	301 ROUTE 81
24-08Q	KRUMENACKER MARK & MICHELLE	41 WOLF HOLLOW RD	KILLINGWORTH	CT	06419	41 WOLF HOLLOW LANE
24-05	MARCHITTO LYNN	320 ROUTE 81	KILLINGWORTH	CT	06419	320 ROUTE 81
28-80R	MARINO GAETANO	55 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	55 WOLF HOLLOW LANE
24-08H	MCGLYNN JAMES & MARSHA A	23 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	23 WOLF HOLLOW LANE
24~081	MOHAMMED RAFI & DAWN WALDEN EL	17 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	17 WOLF HOLLOW LANE
24-03D	MOORE CLAYTON F & DIANA Z	326 ROUTE 81	KILLINGWORTH	CT	06419	326 ROUTE 81
24-08G	PISCITELLI FRANCO	27 WOLF HOLLOW LANE	KILLINGWORTH	CT	06419	27 WOLF HOLLOW LANE
24-04	REGIONAL SCHOOL DISTRICT NO 17	LITTLE CITY ROAD	HIGGANUM	CT	06441	340 ROUTE 81
28-28C	RICKERT CHARLES J & MARY W	293 ROUTE 81	KILLINGWORTH	CT	06419	293 ROUTE 81
28-27	SCHUELER DOUGLAS G & JUDY L	306 ROUTE 81	KILLINGWORTH	CT	06419	306 ROUTE 81
24-06	VOLZ CYNTHIA E EST	15 BEACH ROAD	CLINTON	CT	06413	310 ROUTE 81
24-03C	ZARRA RALPH & DIANNE	16 POOL RD	NORTH HAVEN	CT	06473	322 ROUTE 81

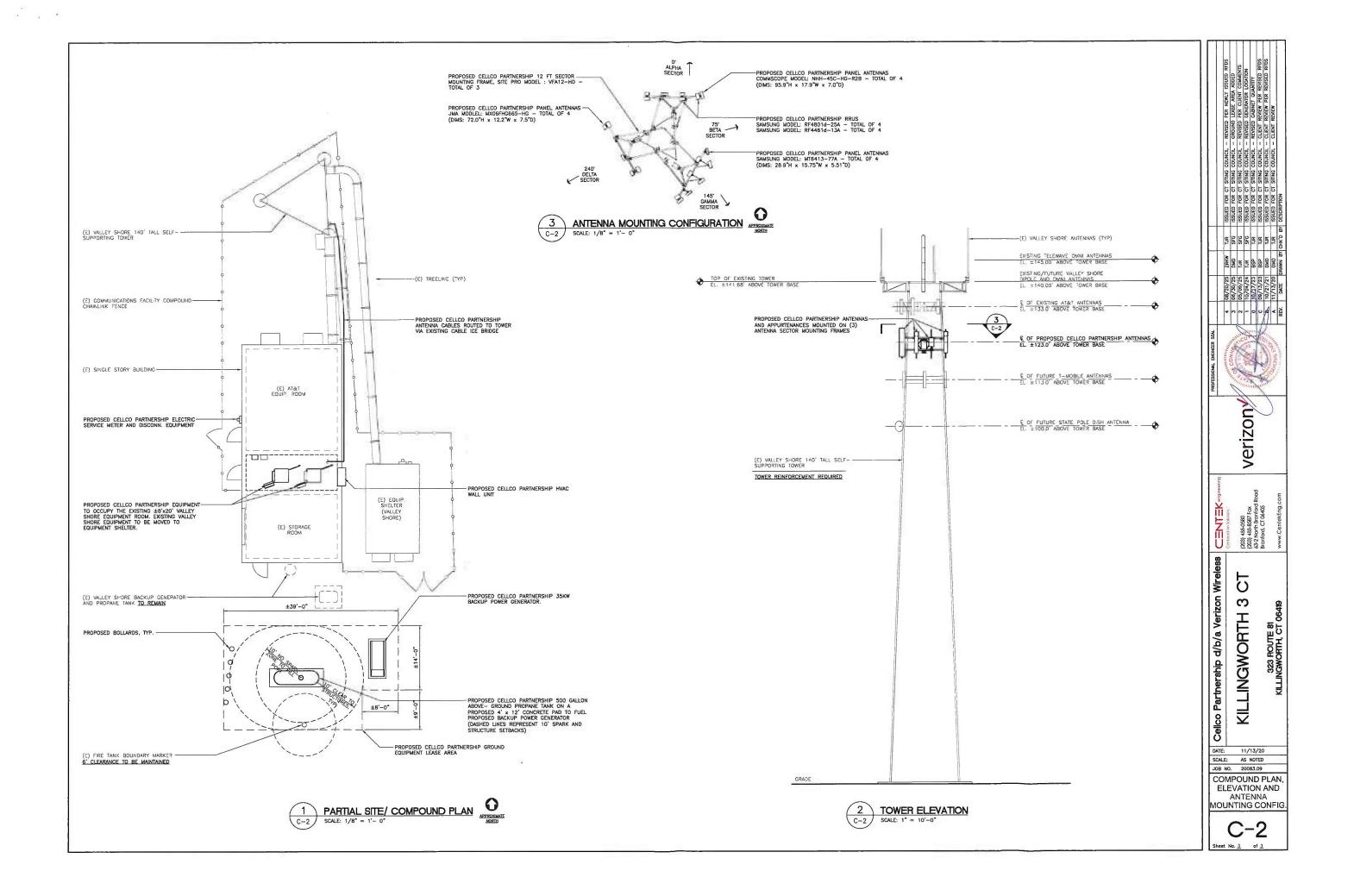


(IN FEET) 1 mch = 200 ft.

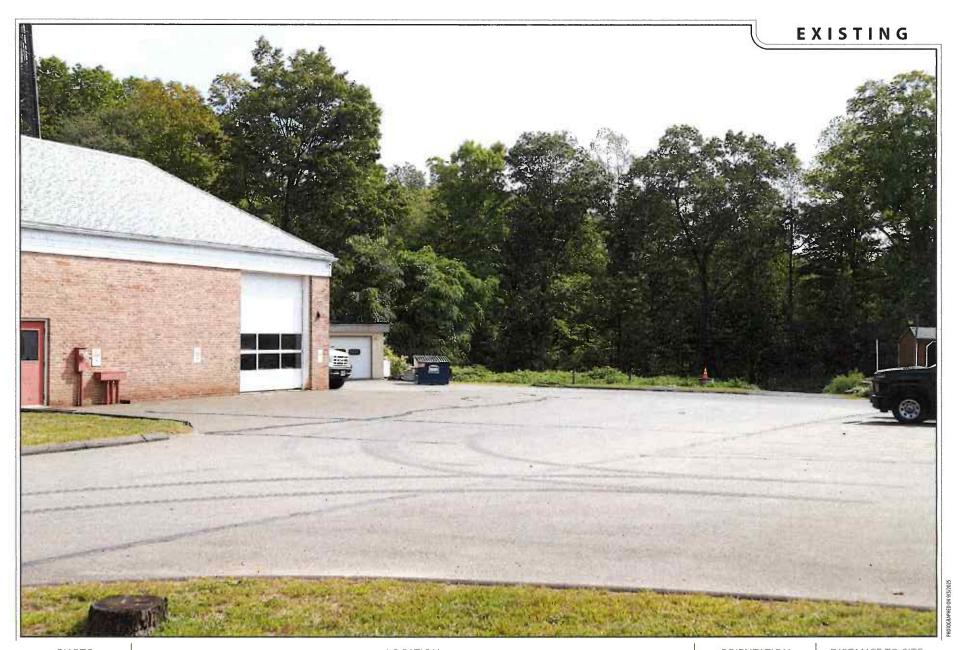


PROPERTY LINES AND PROPERTY OWNER INFORMATION SHOWN HEREIM ARE REFERENCED FROM THE TOWN OF KILLINGWORTH ONLINE GIS DATABASE.

C-1



ATTACHMENT 2



1	HIGGANUM ROAD	NW	+/- 250 FEET
PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE





HIGGANUM ROAD ORIENTATION DISTANCE TO SITE

+/- 250 FEET



ATTACHMENT 3



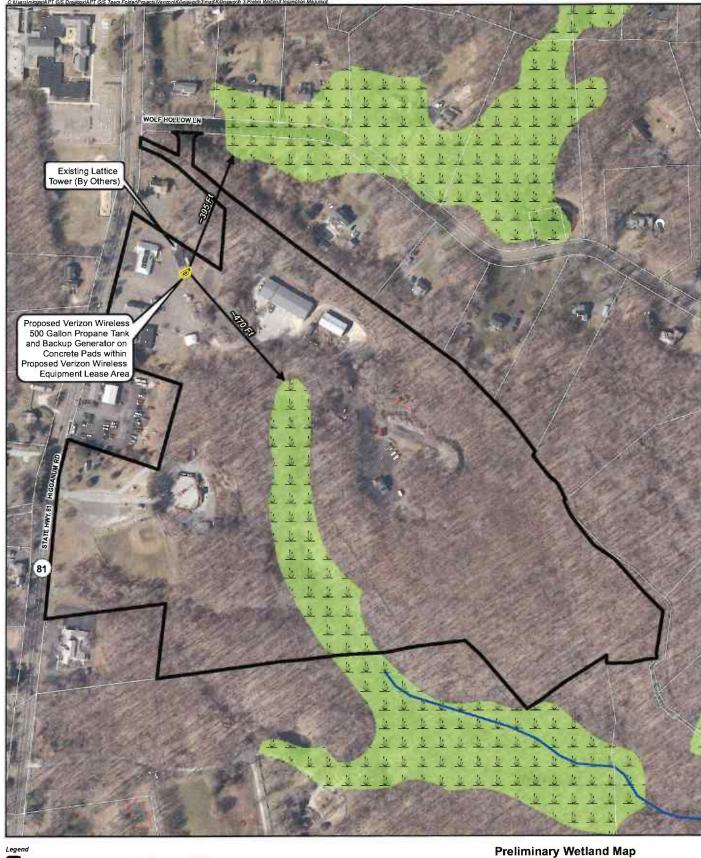
EW

ALL-POINTS WETLAND DESKTOP REVI					
September 9, 2025 APT Project No.: CT14111540					
Prepared For:	Cellco Partnership d/b/a Verizon Wireless 20 Alexander Drive, Wallingford, CT 06492				
Site Name & Address:	Killingworth 3 CT – 323	Route 81	I, Killingworth, CT		
Wetlands Identified on Subject Property:	Yes ⊠ No □				
Nearest Wetland Resource:	±470 feet to the southeast (o ±395 feet to north (off subject	-	' ' '		
Remote Sensing Identification Methods:	Type: CTDEEP Wetland Mappi	ng	Type: Aerial Photograph		
Municipal Upland Review Area:	Wetlands: 100 feet		Watercourses: 100 feet		
Site Conditions: Developed Type:	Municipal/Utility				
Paved ⊠	Gravel □	M	aintained Lawn ⊠		
Agriculture □	Cultivated □				
Comments: The proposed g	round work is located entirely of telecommunication facility condevelopments.				
Nearest Wetland/Waterco	urse Type:				
Emergent □	Scrub-shrub □	Fores	ted ⊠		
Open Water □			Meadow □		
Perennial Watercourse □	Intermittent Watercourse				
	vetland is associated with a relative interior intermittent watercourse facility.				
Floodplain/Rare Species H	abitat:				
100-year Floodplain □	500-year Floodplain □	NDDF	B Buffer Area □		
	is not located within a flood haz	ard zone	e or NDDB Buffer Area. Nearest		

Attachment

Preliminary Wetland Map

Please note this document is provided as a preliminary determination on the potential presence of wetlands or watercourses on or in proximity to proposed ground work associated with the referenced telecommunicsations project. This analysis is based solely on a review of publically available remote sensing resources (i.e., wetland mapping, soil mapping, aerial photographs, hydrography mapping, etc.), recognizing the data precision/ommission limitations inherent in these resources, and does not represent an actual field investigation performed by a qualified soil/wetland scientist.





Map Notes:
Base Map Source: 2023 CT Aerial Imagery (CTECO)
Welland and watercourse date obtained from publicly available date sources
and photointerpretation of aerial photographs. No field surveys performed.
Map Scale: in



Proposed Telecommunications Facility Killingworth 3 CT 323 Route 81 Killingworth, Connecticut

