

DOCKET NO. 519 - Cellco Partnership d/b/a Verizon Wireless } Connecticut
application for a Certificate of Environmental Compatibility and Public }
Need for the construction, maintenance, and operation of a } Siting
telecommunications facility located at 11 Chamberlain Road, East }
Windsor, Connecticut. } Council

July 12, 2024

Draft Findings of Fact

Introduction

1. Cellco Partnership d/b/a Verizon Wireless (Cellco), in accordance with provisions of Connecticut General Statutes (C.G.S.) § 16-50g, *et seq*, applied to the Connecticut Siting Council (Council) on October 26, 2023, for a Certificate of Environmental Compatibility and Public Need (Certificate) for the construction, maintenance, and operation of a 120-foot monopole wireless telecommunications facility at 11 Chamberlain Road, East Windsor, Connecticut. (refer to Figures 1-3). (Cellco 1, p.2)
2. Cellco is a Delaware Partnership with an office at 20 Alexander Drive, Wallingford, Connecticut. Cellco is licensed by the Federal Communications Commission (FCC) to provide personal wireless communication service in Connecticut. (Cellco 1, p. 3)
3. Cellco is the only party to this proceeding. (Record)
4. There are no Connecticut Environmental Protection Act (CEPA) Intervenors in this proceeding. (Record).
5. The purpose of the proposed facility is to replace Cellco's existing facility (Broadbrook) located on an abandoned water tower in the southern portion of the host parcel, provide reliable wireless communications services for Cellco customers and address coverage and capacity deficiencies in eastern and central portions of East Windsor. (Cellco 1 pp. 1, 2, 7, 8, Attachment 6)
6. Under C.G.S. §16-50p(b), there is a presumption of public need for personal wireless services and the Council is limited to consideration of a specific need for any proposed facility to be used to provide such services to the public. (C.G.S. §16-50p(b) (2023))
7. Also under C.G.S. §16-50p(b), the Council must examine whether the proposed facility may be shared with any public or private entity that provides service to the public if the shared use is technically, legally, environmentally and economically feasible and meets public safety concerns, and may impose reasonable conditions as it deems necessary to promote the immediate and shared use of telecommunications facilities and avoid the unnecessary proliferation of such facilities consistent with the state tower sharing policy. (C.G.S. §16-50p(b) (2023); C.G.S. §16-50aa (2023); (Cellco 1 p. 12)
8. Pursuant to C.G.S. § 16-50l (b), Cellco provided public notice of the filing of the application that was published in the Hartford Courant on October 23 and 24, 2023. (Cellco 2)
9. Pursuant to C.G.S. § 16-50l (b), notice of the application was provided to all abutting property owners by certified mail on October 23, 2023. A certified mail receipt from one abutting property owner, the National Railroad Passenger Corporation (NRPC), was not received. The NRPC did,

- however, contact the Cellco's counsel confirming receipt of notice. (Cellco 1, p. 4, Attachment 4; Cellco 4, response 1)
10. On October 26, 2023, Cellco provided notice to all federal, state and local officials and agencies listed in C.G.S. § 16-50l (b). (Cellco 1, p. 4, Attachment 2)
 11. Upon receipt of the application, the Council sent a letter to the Town of East Windsor (Town) on October 27, 2023, as notification that the application was received and is being processed, in accordance with C.G.S. § 16-50gg. (Record)
 12. Pursuant to Regulations of Connecticut State Agencies (R.C.S.A.) §16-50v-3: "The Council shall refrain from considering any pending and future matters filed by any person who fails to pay invoice and assessment amounts that are past due to the Council by 30 days or more under §16-50v of the Connecticut General Statutes." (R.C.S.A. §16- 50v-3 (2023))
 13. On November 30, 2023, the Council provided notice to Cellco that it had 14 outstanding invoices that were more than 30 days past due and that the Council will not process any pending and future Cellco matters until payment was received in full. (Record)
 14. The notice to Cellco had the effect of tolling the FCC 150-day decision deadline. (Record).
 15. The Council acknowledged receipt of Cellco's payment in full of the outstanding invoices on December 28, 2023. (Record)

Procedural Matters

16. C.G.S. §1-225a permits public agencies to hold remote meetings under the Freedom of Information Act (FOIA) and the Uniform Administrative Procedure Act. FOIA defines "meeting" in relevant part as "any hearing or other proceeding of a public agency." (Council Administrative Notice Item No. 56; C.G.S. §1-200, *et seq.* (2023))
17. C.G.S. §1-225a allows public agencies to hold remote meetings provided that:
 - a) The public has the ability to view or listen to each meeting or proceeding in real-time, by telephone, video, or other technology;
 - b) Any such meeting or proceeding is recorded or transcribed and such recording or transcript shall be posted on the agency's website within seven (7) days of the meeting or proceeding;
 - c) The required notice and agenda for each meeting or proceeding is posted on the agency's website and shall include information on how the meeting will be conducted and how the public can access it any materials relevant to matters on the agenda shall be submitted to the agency and posted on the agency's website for public inspection prior to, during and after the meeting; and
 - d) All speakers taking part in any such meeting shall clearly state their name and title before speaking on each occasion they speak.(Council Administrative Notice Item No. 56)
18. Local zoning regulations do not apply to facilities under the exclusive jurisdiction of the Council. Pursuant to C.G.S §16-50x, the Council has exclusive jurisdiction over telecommunications facilities throughout the state. It shall consider any location preferences provided by the host municipality under C.G.S §16-50gg as the Council shall deem appropriate. (C.G.S. §16-50x (2023))

19. During a regular Council meeting January 4, 2024, the application was deemed complete pursuant to R.C.S.A. § 16-50l-1a and the public hearing schedule was approved by the Council. (Record; Tr. 1, p. 5)
20. Pursuant to C.G.S. § 16-50m, on January 4, 2024, the Council sent a letter to the Town to provide notification of the scheduled public hearing via Zoom remote conferencing and to invite the municipality to participate. (Record)
21. Pursuant to C.G.S. § 16-50m, the Council published legal notice of the date and time of the remote public hearing via Zoom conferencing in the Journal Inquirer on January 6, 2024. (Record; Tr. 1, p 5)
22. The Council's Hearing Notice did not refer to a public field review of the proposed site. Field reviews are neither required by statute nor an integral part of the public hearing process. The purpose of a field review is an investigative tool to acquaint members of a reviewing commission with the subject property. (Record; Tr. 1, pp. 8-9; *Manor Development Corp. v. Conservation Comm. of Simsbury*, 180 Conn. 692, 701 (1980); *Grimes v. Conservation Comm. of Litchfield*, 243 Conn. 266, 278 (1997))
23. On February 2, 2024, in lieu of an in-person field review of the proposed site, the Council requested that Cellco submit photographic documentation of site-specific features into the record intended to serve as a "virtual" field review of the site. On February 14, 2024, Cellco submitted such information in response to the Council's interrogatories. (Record; Cellco 4, response 39)
24. On November 15, 2023, pursuant to C.G.S. §16-50o, Cellco filed a Motion for Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site. (Record)
25. On January 4, 2024, the Council issued a Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site, pursuant to C.G.S. §1-210(b) and consistent with the Conclusions of Law adopted in Council Docket 366. (Record; Cellco 3)
26. Pursuant to C.G.S. §16-50p(g), the Council shall in no way be limited by Cellco already having acquired land or an interest therein for the purpose of constructing the proposed facility. (C.G.S. §16-50p(g) (2023); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))
27. The Council's evaluation criteria under C.G.S. §16-50p does not include the consideration of property ownership or property values nor is the Council otherwise obligated to take into account the status of property ownership or property values. (C.G.S. §16-50p (2021); *Westport v. Conn. Siting Council*, 47 Conn. Supp. 382 (2001); *Goldfisher v. Conn. Siting Council*, 95 Conn. App. 193 (2006))
28. On January 24, 2024, the Council held a pre-hearing conference on procedural matters for parties and intervenors to discuss the requirements for pre-filed testimony, exhibit lists, administrative notice lists, expected witness lists and filing of pre-hearing interrogatories. Procedures for the public hearing via Zoom conferencing were also discussed. (Council Pre-Hearing Conference and Remote Hearing Procedure Memoranda, dated January 17, 2024)
29. In compliance with R.C.S.A. §16-50j-21, Cellco installed a four-foot by eight-foot sign at the corner of Chamberlain Road and Apothecaries Hall Road in the vicinity of the access drive for the

- proposed site on February 12, 2024. The sign presented information regarding the proposed telecommunications facility and the Council's public hearing. (Cellco 5; Tr.1, p. 5; Record)
30. Pursuant to C.G.S. § 16-50m, the Council gave due notice of a public hearing to be held on February 27, 2024, beginning with the evidentiary session at 2:00 p.m. and continuing with the public comment session at 6:30 p.m. via Zoom remote conferencing. The Council provided information for video/computer access or audio only telephone access. (Council's Hearing Notice dated January 4, 2024; Tr. 1, p. 5; Tr. 2, p. 3)
 31. The 6:30 p.m. public comment session afforded interested persons the opportunity to provide oral limited appearance statements. Interested persons were also afforded an opportunity to provide written limited appearance statements at any time up to 30 days after the close of the evidentiary record. Limited appearance statements in this proceeding, whether oral or written, were not provided under oath nor subject to cross examination. (Tr. 1, p. 6-7; Tr. 2, p. 5-6; C.G.S. §16-50n(f) (2023))
 32. No oral limited appearance statements were made during the public comment session of the Council's hearing held on February 27, 2024. (Tr. 2, p. 9)
 33. In compliance with C.G.S. §1-225a:
 - a) The public had the ability to view and listen to the remote public hearings in real-time, by computer, smartphone, tablet or telephone;
 - b) The remote public hearings were recorded and transcribed, and such recordings and transcripts were posted on the Council's website on February 27, 2024 and March 12, 2024.
 - c) The Hearing Notice, Hearing Program, Citizens Guide for Siting Council Procedures and Instructions for Public Access to the Remote Hearings were posted on the Council's website;
 - d) Prior to, during and after the remote public hearings, the record of the proceeding has been, and remains, available on the Council's website for public inspection; and
 - e) The Council, parties and intervenors provided their information for identification purposes during the remote public hearings.(Hearing Notice dated January 4, 2024; Tr. 1; Tr. 2; Record)
 34. The purpose of discovery is to provide the Council, parties and intervenors access to all relevant information in an efficient and timely manner to ensure that a complete and accurate record is compiled. (R.C.S.A. §16-50j-22a (2023))
 35. In an administrative proceeding, irrelevant, immaterial or unduly repetitious evidence shall be excluded, and an agency has the right to believe or disbelieve the evidence presented by any witness, even an expert, in whole or in part. (C.G.S. §4-178 (2023); *Dore v. Commissioner of Motor Vehicles*, 62 Conn. App. 604 (2001); R.C.S.A. §16-50j-25)
 36. Pursuant to C.G.S. §16-50n(f), at the conclusion of the hearing session held on February 27, 2024, the Council closed the evidentiary record for Docket 519 and established March 28, 2024 as the deadline for public comments and the submission of briefs and proposed findings of fact. (Record)
 37. On March 22, 2024, the Council requested an extension of time to August 30, 2024 to render a final decision. On March 25, 2024, Applicants consented to the Council's request for an extension of time to August 31, 2024. (Record)

38. Constitutional principles permit an administrative agency to organize its hearing schedule so as to balance its interest in reasonable, orderly and non-repetitive proceedings against the risk of erroneous deprivation of a private interest. It is not unconstitutional for the Council, in good faith, to balance its statutory time constraints against the desire of a party, intervenor or CEPA intervenor for more time to present their objections to a proposal. (*Concerned Citizens of Sterling v. Conn. Siting Council*, 215 Conn. 474 (1990); *Pet v. Dept. of Public Health*, 228 Conn. 651 (1994); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014))

State Agency Comment

39. Pursuant to C.G.S. § 16-50j (g), on January 4, 2024, the following state agencies were solicited by the Council to submit written comments regarding the proposed facility: Department of Energy and Environmental Protection (DEEP); Department of Public Health (DPH); Council on Environmental Quality (CEQ); Public Utilities Regulatory Authority (PURA); Office of Policy and Management (OPM); Department of Economic and Community Development (DECD); Department of Agriculture (DOAg); Department of Transportation (DOT); Connecticut Airport Authority (CAA); Department of Emergency Services and Public Protection (DESPP); and State Historic Preservation Office (SHPO). (Record)
40. On January 10, 2024, the Council received comments from CAA related to potential impacts to nearby air navigation facilities.¹ This topic, among other public health and safety concerns, are addressed in the Public Health and Safety section of this document, pursuant to C.G.S. §16-50p. (Record)
41. No other state agencies responded with comments on the application. (Record)
42. While the Council is obligated to consult with and solicit comments from state agencies by statute, the Council is not required to abide by the comments from state agencies. (C.G.S. §16-50p(g) (2023); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007)).

Municipal Consultation

43. Pursuant to C.G.S. § 16-50(f), Cellco commenced the 90-day pre-application municipal consultation process on June 1, 2023 by submitting a technical report for the proposed facility to the Town First Selectman. (Cellco 1, p. 19; Bulk Filing Section 1)
44. The Town did not request Cellco to hold a public information meeting and did not provide any comments to Cellco. (Cellco 1, p. 20; Cellco 4, response 2)
45. After filing the application, Cellco had discussions with an abutting property owner to the east of the proposed site regarding impact the tower may have on current farming operations and a potential future campground, as well as the possibility of relocating the proposed tower to the property. (Cellco 4, response 2)
46. On March 5, 2024, the Town Police Chief submitted comments to the Council regarding reservation of space for collocation of emergency services equipment at the proposed. (Record)

¹https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/1_media_do500_600/do519/proceduralcorrespondence/do519-caacommentstred_a.pdf (CAA comments, dated January 9, 2024)

Public Need for Service

47. In 1996, the United States Congress recognized a nationwide need for high quality wireless telecommunications services, including cellular telephone service. Through the Federal Telecommunications Act of 1996, Congress seeks to promote competition, encourage technical innovations, and foster lower prices for telecommunications services. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
48. In issuing cellular licenses, the Federal government has preempted the determination of public need for cellular service by the states and has established design standards to ensure technical integrity and nationwide compatibility among all systems. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
49. Section 253 of the Telecommunications Act of 1996 prohibits any state or local statute or regulation, or other state or local legal requirement from prohibiting or having the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
50. Section 704 of the Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services and from prohibiting or having the effect of prohibiting the provision of personal wireless services. This section also requires state or local governments to act on applications within a reasonable period of time and to make any denial of an application in writing supported by substantial evidence in a written record. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
51. Section 704 of the Telecommunications Act of 1996 also prohibits any state or local entity from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions, which include effects on human health and wildlife, to the extent that such towers and equipment comply with FCC’s regulations concerning such emissions. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
52. Section 706 of the Telecommunications Act of 1996 requires each state commission with regulatory jurisdiction over telecommunications services to encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans, including elementary and secondary schools, by utilizing regulating methods that promote competition in the local telecommunications market and remove barriers to infrastructure investment. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
53. In December 2009, President Barack Obama recognized cell phone towers as critical infrastructure vital to the United States. The Department of Homeland Security, in collaboration with other federal stakeholders, state, local, and tribal governments, and private sector partners, has developed the National Infrastructure Protection Plan (NIPP) to establish a framework for securing resources and maintaining resilience from all hazards during an event or emergency. (Council Administrative Notice Item No. 11 –Presidential Proclamation 8460, Critical Infrastructure Protection)
54. In February 2012, Congress adopted the Middle Class Tax Relief and Job Creation Act (also referred to as the Spectrum Act) to advance wireless broadband service for both public safety and commercial users. The Act established the First Responder Network Authority (FirstNet) to oversee the construction and operation of a nationwide public safety wireless broadband network. Section 6409 of the Act contributes to the twin goals of commercial and public safety wireless broadband deployment through several measures that promote rapid deployment of the network facilities

- needed for the provision of broadband wireless services. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012)
55. In June 2012, President Barack Obama issued an Executive Order to accelerate broadband infrastructure deployment declaring that broadband access is a crucial resource essential to the nation’s global competitiveness, driving job creation, promoting innovation, expanding markets for American businesses and affording public safety agencies the opportunity for greater levels of effectiveness and interoperability. (Council Administrative Notice Item No. 12 – Presidential Executive Order 13616, Accelerating Broadband Infrastructure Development; Council Administrative Notice Item No. 23 – FCC Wireless Infrastructure Report and Order)
 56. Pursuant to Section 6409(a) of the Spectrum Act, a state or local government may not deny and shall approve any request for collocation, removal or replacement of equipment on an existing wireless tower provided that this does not constitute a substantial change in the physical dimensions of the tower. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012; Council Administrative Notice Item No. 23 – FCC Wireless Infrastructure Report and Order)
 57. In June 2020, the FCC issued a declaratory ruling that heights of existing towers located outside of the public right-of-way could increase by up to 20 feet plus the height of a new antenna without constituting a substantial change in the physical dimensions of a tower. (Council Administrative Notice Item No. 27)
 58. In November 2020, the FCC issued an order that ground excavation or deployment up to 30 feet in any direction beyond the site boundary of existing towers located outside of the public right-of-way does not constitute a substantial change in the physical dimensions of a tower. (Council Administrative Notice Item No. 28)
 59. According to state policy, if the Council finds that a request for shared use of a facility by a municipality or other person, firm, corporation or public agency is technically, legally, environmentally and economically feasible, and the Council finds that the request for shared use of a facility meets public safety concerns, the Council shall issue an order approving such shared use to avoid the unnecessary proliferation of towers in the state. (C.G.S. §16-50aa(2023))
 60. The Town Plan of Conservation and Development encourages the development of a Town-wide utility infrastructure plan that includes, but is not limited to, telecommunications facilities. (Cellco 1, p. 18; Bulk Filing Section 4– Town Plan of Conservation and Development)
 61. On January 4, 2024, the Council sent correspondence to other telecommunications carriers not intervening in the proceeding requesting that carriers interested in locating on the proposed facility in the foreseeable future to notify the Council by February 20, 2024. No carriers responded to the Council’s solicitation. (Record)
 62. The facility would be designed to accommodate four wireless carriers and municipal antennas. T-Mobile and the Town have expressed interest in collocation at the site. (Cellco 1, p.12; Cellco 4, response 9; Tr. 1, p. 29)

Cellco’s Existing and Proposed Wireless Services

63. Cellco received approval from the Town to install equipment on the existing water tower at the site (Broadbrook facility) in 1995 when the water tower was operational. In 2000, the Council assumed

- jurisdiction over the water tower when it was abandoned and Sprint, the predecessor to T-Mobile, requested to collocate its equipment at the site. (Council EM-VER-047-180213)
64. The existing Broadbrook facility consists of an abandoned water tower that supports Cellco antennas at a height of 116 feet above ground level (agl). T-Mobile antennas are also located on the water tower at 104 feet agl. Cellco determined a need to upgrade its equipment at the Broadbrook facility and determined the existing water tower would not be structurally capable of supporting Cellco's upgraded equipment and the existing T-Mobile antennas. (Cellco 1, pp.1, 2)
 65. Cellco would have a significant coverage deficiency in its wireless communications network in portions of central East Windsor following the removal of its existing facility. The coverage deficiency was confirmed by coverage modeling. (Cellco 1, pp. 7, 8; Attachment 6)
 66. Roads in the area without adequate service include, but are not limited to, Chamberlain Road, Rye Street, and Broad Brook Road (Route 191). (Cellco 1 p. 9; Attachment 6)
 67. Cellco proposes to operate 700 MHz, 850 MHz, 1900 MHz, 2100 MHz frequencies at the site from a tower height of 115 feet agl. All frequencies are capable of supporting 5G services. All frequencies would be capable of transmitting voice and data. (Cellco 1, pp. 8-9; Cellco 4, response 13)
 68. Cellco designs its network using a -95 dBm signal level threshold for reliable in-vehicle service and -85 dBm for reliable in-building service. (Cellco 4, response 18)
 69. The 700 MHz frequency provides the largest area of service and therefore defines the coverage footprint of the Cellco's wireless network. Other frequencies (850 MHz, 1900 MHz, 2100 MHz) used in Cellco's network provide smaller coverage footprints and are used to provide additional capacity to the system, reducing the customer load on the 700 MHz system, thereby increasing the data speeds available to users that only have 700 MHz coverage. (Cellco 1, Attachment 6; Cellco 4, response 17)
 70. Cellco currently operates five facilities within the Town. The proposed facility would replace its existing Broadbrook facility and provide additional coverage and capacity in central and eastern East Windsor. (refer to Figure 4 and 5). (Cellco 1 pp. 7, 8, Attachment 6, pp. 1-2)
 71. Cellco designs its network using a -95 dB Reference Signal Received Power (RSRP) standard for reliable in-vehicle service and -85 dB RSRP standard for reliable in-building service. Data speeds increase with a stronger signal. (refer to Figure 6). (Cellco 1 p. 9)
 72. Cellco's installation would provide reliable in-vehicle coverage (-95 dBm) to the proposed service area. Specific coverage for the proposed site is presented in the table below:

Street Name	700 MHz coverage in mi		850 MHz coverage in mi		1900 MHz coverage in mi		2100 MHz coverage in mi	
	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm
Route 191	0.1	0.9	0.1	0.8	0	0	0	0
Chamberlain Road	0.9	1.5	0.8	1.3	0.9	1.1	0.8	0.9
Rye Street	1.4	2.0	1.4	1.9	0.3	0.8	0.1	0.6
Overall Coverage Footprint (Square Miles)	1.8	5.5	1.2	5.0	0.7	2.4	0.4	1.2

(Cellco 1 p. 9)

73. Lowering the height of Cellco’s proposed antennas would reduce the coverage footprint and create coverage gaps between the existing coverage and the coverage of the proposed site. (Cellco 1, Attachment 6; Cellco 4, response 19)
74. The proposed facility would provide limited capacity relief to Cellco’s existing East Windsor and South Windsor North sites located approximately 3.4 miles to the southwest and 1.8 miles to the south, respectively. (Cellco 1, pp. 7, 8; Attachment 6)

Site Selection

75. In 2021, Cellco conducted a condition assessment of the existing water tower that concluded the entire structure was deteriorated. (Tr. 1, pp. 27-29)
76. Cellco began its search for a site on the host parcel, since its need for a new facility was to replace an existing facility Cellco entered into a lease agreement with the host parcel owner and ended the search for alternative locations. (Cellco 1 p. 12)
77. Cellco entered into a lease agreement with the parcel owner for its equipment installation on the functioning water tank at 11 and 15 Chamberlain Road in May of 1995 and amended the lease in June of 2015. The new lease for the proposed replacement facility site was signed in August of 2023. (Cellco 1 p. 12, Attachment 16)
78. The purpose of the proposed facility is to replace the existing Broadbrook facility and to maintain or improve upon the wireless service provided by the existing Broadbrook facility. (Cellco 1, p. 12)
79. The Council has no authority to compel a parcel owner to sell or lease property, or portions thereof, for the purpose of siting a facility nor shall the Council be limited in any way by the applicant having already acquired land or an interest therein for the purpose of constructing a facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007); C.G.S. §16-50p(g)(2023))
80. For any site to be considered a feasible and prudent alternative to a proposed facility site, it must be available to host the proposed facility. The Council has no authority to force a property owner to agree to sell or lease land, or any portion thereof, as a primary or alternative location for a proposed facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))

Small Cells and Distributed Antenna Systems

81. A series of small cells or a Distributed Antenna System (DAS) to serve the area is not cost effective or feasible given the number of facilities required and encumbrances on existing utility poles such as transformers, risers, and streetlights that would limit a carrier's ability to use the pole. While the number of small cells or DAS nodes that would be required to provide comparable service is unknown, it is expected to be a large number given the size of the service area. (Cellco 4, response 25)
82. Small cell limitations include a reduction in the number of frequencies deployed, the lack of structure sharing with other carriers, and the lack of space for emergency backup power. (Cellco 4, response 25)
83. To provide wireless service to the proposed service area would require a significant number of small cell deployments either on existing utility poles or on new utility poles along roadways or on private parcels throughout the proposed service area and would not be economically viable as a replacement for a single tower site. (Cellco 4, response 25)

Proposed Site

84. Pursuant to R.C.S.A. §16-50j-2a(29), "Site" means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. (R.C.S.A. §16-50j-2a(29)(2023))
85. The proposed site is located on an approximate 10.9-acre parcel owned by the Nutrien Ag Solutions, Inc f/k/a Crop Production Services, Inc. at 11 Chamberlain Road. The parcel has frontage on Apothecaries Hall Road to the south and Chamberlain Road to the southeast (refer to Figure 7). (Cellco 1, p. 8; Attachment 1)
86. The host parcel is zoned manufacturing (M-1). (Cellco 1, p. 18)
87. Land use immediately surrounding the site includes an existing rail line and concrete recycling facility to the west, a sand and gravel mining operation to the south and undeveloped woodlands to the north. (Cellco 1, Attachment 1)
88. The tower site would be at an approximate ground elevation of 174 feet above mean sea level. (Cellco 1, Attachment 1)
89. The proposed tower site is located in the northeast portion of the host parcel, 650 feet northeast of the existing Broadbrook facility. (Cellco 1, Attachment 1)
90. The existing water tower is approximately 123 feet agl and is located within a 43-foot by 34-foot fenced compound. The footprint of the structure is 30 feet by 30 feet. (Tr. 1, pp. 13, 14)
91. The existing water tower is owned by the property owner. Removal of the water tower would either be accomplished by the property owner or as part of a negotiated agreement between the property owner and Cellco. (Tr. 1, pp. 29-30, 42-43; 47-52)
92. If requested by the property owner, Cellco would negotiate the removal of the existing water tower. (Tr. 1, pp. 13-15; 29-30)

93. Removal of the existing water tower is expected to cost approximately \$400,000 to \$600,000 based on removal of similar water towers in 2019. (Tr. 1, p. 54)
94. Cellco would decommission and remove its equipment from the compound of the Broadbrook facility. The existing equipment shelter would remain at the water tank site. (Tr. pp. 14-15, 52)
95. The proposed access road would extend west from Chamberlain Road to the tower. (Cellco 1, Attachment 1)
96. The tower site would be within a 100-foot by 100-foot (10,000 square foot) lease area. (Cellco 1, Attachment 1)
97. Development of the site would disturb less than one acre of land (approximately 0.16 acres). (Cellco 1, Attachment 1; Cellco 4, response 15)

Proposed Facility

98. The proposed facility would consist of a 120-foot monopole within a 50-foot by 50-foot (2,500 square foot) equipment compound. (Refer to Figure 8). (Cellco 1, Attachment 1)
99. The facility could be designed to support an increase in height of up to 20 feet. (Cellco 4, response 5)
100. Cellco would install 9 panel antennas and 9 remote radio heads on an antenna platform at a centerline height of 115 feet agl (refer to Figure 9). (Cellco 1, Attachment 1)
101. The compound is designed to accommodate equipment pads for five tenants. (Cellco 1, Attachment 1)
102. Cellco would install two equipment cabinets and a 50-kilowatt diesel-fueled emergency backup generator on a 10-foot by 20-foot concrete pad. (Cellco 1, Attachment 1)
103. The proposed equipment compound will be surrounded by an eight-foot high chain link fence. The proposed compound fence would have a double swing access gate that would be locked for security purposes. (Cellco 1, Attachment 1)
104. Access to the tower site would be from a new 260-foot long gravel drive extending north from the Chamberlain Road. (Cellco1, Attachment 1)
105. Power and telecommunications utilities would extend underground from the compound to an existing utility pole on Chamberlain Road. No upgrades to the existing distribution line are proposed. (Cellco 1, Attachment 1)
106. A geotechnical survey using a track-mounted boring rig would be performed prior to construction to evaluate existing subsurface conditions at the site for the preparation of the Development and Management (D&M) Plan if the Project was approved. Some minor tree/brush clearing may be required to allow access for the drill rig to the soil boring locations. (Tr. 1, pp. 15-16)
107. A D&M Plan is a condition of a Council final decision that must be met prior to commencement of construction and constitutes the “nuts and bolts” of a facility approved by the Council. (CGS

§16-50p (2023); R.C.S.A. §16-50j-75, *et seq.*; *Town of Westport v. Conn. Siting Council*, 260 Conn. 266 (2002))

108. Cellco does not anticipate any blasting to construct the site. (Cellco 4, response 4)
109. Construction would require 1,212 cubic yards of excavation for the compound area. (Cellco 4, response 3)
110. There are no residences within 1,000 feet of the site. (Cellco 1, p.14, Attachment 1)
111. The nearest property line from the tower is approximately 150 feet to the east along Chamberlain Road. The nearest residential property line from the tower is approximately 1,075 feet to the west at 75 Rye Street. (Cellco 1, p. 14)
112. Cellco anticipates the facility would be constructed over a 6 to 8 week period, followed by 2 weeks of radio frequency testing and system integration. (Cellco 1, p. 21)
113. Site construction would commence following Council approval of a D&M Plan for the facility. (Cellco 1, p. 21)
114. A copy or notice of the filing of a D&M Plan with the Council, is required to be provided to the service list for comment. (R.C.S.A. §16-50j-75(e)(2023))
115. The Council has statutory authority to order a D&M Plan and the Council's D&M Plan process has been upheld by the Connecticut Supreme Court. (CGS §16-50p (2021); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014))
116. The site will be accessed periodically for maintenance activities. (Cellco1, p. 8)
117. The estimated cost of the proposed facility is:
- | | |
|--------------------------------------|-------------------------|
| Tower and Foundation | \$150,000 |
| Antenna and Coax | \$90,000 |
| Generator | \$25,000 |
| Cell Site and Radio Equipment | \$300,000 |
| Miscellaneous (site prep, utilities) | \$60,000 |
| <u>Total Estimated Costs</u> | <u>\$625,000</u> |
- (Cellco 1, p. 21)
118. Cellco would recover the costs associated with the facility through customer subscriptions and business operations. (Cellco 4, Response 11)
119. Neither the Project, nor any portion thereof, is proposed to be undertaken by state departments, institutions or agencies or to be funded in whole or in part by the state through any grant or contract. Cellco is a private entity. (Cellco 4, response 10; CGS §22a-1, *et seq.* (2023))

Public Health and Safety

120. The Wireless Communications and Public Safety Act of 1999 (911 Act) was enacted by Congress to promote and enhance public safety by making 9-1-1 the universal emergency assistance number, by furthering deployment of wireless 9-1-1 capabilities, and by encouraging construction and

- operation of seamless ubiquitous and reliable networks for wireless services. (Council Administrative Notice Item No. 6 - Wireless Communications and Public Safety Act of 1999)
121. The proposed facility would be in compliance with the requirements of the 911 Act and would provide Enhanced 911 services. (Cellco 1, pp. 5-6))
122. Wireless carriers have voluntarily begun supporting text-to-911 services nationwide in areas where municipal Public Safety Answering Points (PSAP) support text-to-911 technology. Text-to-911 will extend emergency services to those who are deaf, hard of hearing, have a speech disability, or are in situations where a voice call to 911 may be dangerous or impossible. However, even after a carrier upgrades its network, a user's ability to text to 911 is limited by the ability of the local 911 call center to accept a text message. The FCC does not have the authority to regulate 911 call centers; therefore, it cannot require them to accept text messages. (Council Administrative Notice Item No. 21 – FCC Text-to-911: Quick Facts & FAQs)
123. Cellco's proposed equipment installations would be capable of supporting text-to-911 service. (Cellco 4, response 30)
124. Pursuant to the Warning, Alert and Response Network Act of 2006, "Wireless Emergency Alerts" (WEA) is a public safety system that allows customers who own enabled mobile devices to receive geographically-targeted, text messages alerting them of imminent threats to safety in their area. WEA complements the existing Emergency Alert System that is implemented by the FCC and FEMA at the federal level through broadcasters and other media service providers, including wireless carriers. (Council Administrative Notice No. 5 – FCC WARN Act)
125. Cellco's proposed equipment would provide WEA services. (Cellco 4, response 31)
126. Pursuant to C.G.S. §16-50p(a)(3)(G), the tower would be constructed in accordance with the current governing standard in the State of Connecticut for tower design and in accordance with the currently adopted International Building Code. (Cellco 4, response 13)
127. The tower would be designed to the Telecommunications Industry Association 222-H Structural Standards for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures. (Cellco 1, Attachment 1, p. 7; Cellco 4, Response 13)
128. The proposed tower would not require notice to the Federal Aviation Administration or constitute an obstruction or hazard to air navigation and therefore would not require any obstruction marking or lighting. (Cellco 4, response 34)
129. In its January 9, 2024 comments, CAA requests that Cellco complete and submit Form FAA 7460-1 to FAA for approval to fully assess these potential impacts. (Record; Tr. 1, pp. 18-19, 32-34)
130. Cellco would coordinate with the FAA regarding the facility as necessary. (Tr. 1, pp. 18-19, 32-34; 48-49)
131. Security measures at the site would include, but are not limited to, the proposed compound fence, silent intrusion alarms on the equipment cabinets, and removal of climbing pegs on the lower portion of the tower. (Cellco 4, response 12)
132. The tower setback radius* would remain within the parcel boundary and a hinge point would not be necessary. (Cellco 1, Attachment 1)
*The horizontal distance equal to the tower height that extends radially from the center of the tower.

133. Operational noise from the facility would comply with DEEP Noise Control Regulations. (Cellco 1, p. 8)
134. Construction noise is exempt from the DEEP Noise Control Regulations §22a-69-1.8(g), which includes, but is not limited to, “physical activity at a site necessary or incidental to the erection, placement, demolition, assembling, altering, blasting, cleaning, repairing, installing, or equipping of buildings or other structures, public or private highways, roads, premises, parks, utility lines, or other property.” (R.C.S.A. §22a-69-1.8(g))
135. Cellco does not anticipate the need for blasting. If approved, Cellco will perform a Geotechnical Survey of the tower site to determine if blasting will be necessary. (Cellco 4, response 4)
136. The proposed site is not located within the Federal Emergency Management Agency designated 100-year or 500-year flood zone. (Cellco 1, Attachment 14)
137. The site is located within the DEEP designated Hunt Wellfield Aquifer Protection area. A protection plan would be implemented to ensure water quality is not adversely impacted. (Cellco 4, response 32)
138. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of Cellco’s antennas is 9.4 percent of the standard for the General Public/Uncontrolled Maximum Permissible Exposure, as adopted by the FCC, at a horizontal distance of approximately 372 feet from the tower using the proposed antenna configuration. This calculation was based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) using far-field methodology that assumes all channels would be operating simultaneously, which creates the highest possible power density levels. (Cellco 1, p 9, Attachment 13; Council Administrative Notice Item No. 2 – FCC OET Bulletin No. 65)

Emergency Backup Power

139. In response to two significant storm events in 2011, Governor Malloy formed a Two Storm Panel (Panel) that was charged with an objective review and evaluation of Connecticut’s approach to the prevention, planning and mitigation of impacts associated with emergencies and natural disasters that can reasonably be anticipated to impact the state. (Final Report of the Two Storm Panel, (Council Administrative Notice Item No. 53)
140. Consistent with the findings and recommendations of the Panel, and in accordance with C.G.S. §16-50//, the Council, in consultation and coordination with DEEP, DESPP and PURA, studied the feasibility of requiring backup power for telecommunications towers and antennas as the reliability of such telecommunications service is considered to be in the public interest and necessary for the public health and safety. (Council Administrative Notice Item No. 34 – Council Docket No. 432)
141. Commercial Mobile Radio Service (CMRS) providers are licensed by and are under the jurisdiction and authority of the FCC. At present, no standards for backup power for CMRS providers have been promulgated by the FCC. (Council Administrative Notice Item No. 34 – Council Docket No. 432)
142. Cellco proposes to install a 50-kilowatt diesel-fueled generator with an associated 250-gallon tank for backup power. Cellco’s proposed generator would provide approximately 2 to 4 days of run

time before it requires refilling. Cellco would also install an 8-hour backup battery at the site. (Cellco 1 p. 11; Cellco 4, responses 26-29)

143. According to R.C.S.A. §22a-69-1.8, noise created as a result of, or relating to, an emergency, such as an emergency backup generator, is exempt from the DEEP Noise Control Regulations. (R.C.S.A. §22a-69-1.8)

Environmental Effects and Mitigation Measures

Air and Water Quality

144. Operation of the proposed facility would not produce air emissions, excluding operation of the emergency backup generator. (Applicants 1, Attachment 1, p. 8)
145. Pursuant to R.C.S.A. §22a-174-3b, the emergency backup generator would be managed to comply with DEEP's "permit by rule" criteria and would comply with air emissions. Therefore, the generator would be exempt from general air permit requirements. (Applicants 1, Attachment 1, p. 8; R.C.S.A. §22a-174-3b)
146. The Inland Wetlands and Watercourses Act (IWWA), C.G.S. §22a-36, *et seq.*, contains a specific legislative finding that the inland wetlands and watercourses of the state are an indispensable and irreplaceable but fragile natural resource with which the citizens of the state have been endowed, and the preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the state. (C.G.S. §22a-36, *et seq.* (2023))
147. The IWWA grants regulatory agencies with the authority to regulate upland review areas in its discretion if it finds such regulations necessary to protect wetlands or watercourses from activity that will likely affect those areas. (C.G.S. §22a-42a (2023))
148. The IWWA forbids regulatory agencies from issuing a permit for a regulated activity unless it finds on the basis of the record that a feasible and prudent alternative does not exist. (C.G.S. §22a-41 (2023))
149. A Wetland Inspection conducted on March 27, 2023 and April 18, 2023, identified one wetland area that contains a vernal pool, approximately 232 feet northwest of the site (refer to Figure 10). Erosion and sedimentation controls would be installed in compliance with applicable *Connecticut Guidelines for Soil Erosion and Sediment Control* (E&S Guidelines). Cellco would implement a wetland protection plan to be monitored by an environmental monitor. (Cellco 1, Attachment 10; Applicants 1, Attachment 6; Tr. 1, p. 19)
150. An off-site wetland is located approximately 35 feet from the access road. (Tr. 1, p. 19)
151. The proposed site is within the Critical Terrestrial Habitat (CTH) (100-foot to 750-foot) area from the vernal pool. Development of the site would result in a loss of approximately 0.4 acres of the CTH, or approximately less than 1 percent. (Tr. 1, pp. 30, 31)
152. Cellco would incorporate a Wetland, Vernal Pool and Aquifer Protection plan that would include contractor training, establishment of a restrictive barrier and amphibian sweeps by a trained professional. A low level oil alarm for the proposed transformer could also be included. (Tr. 1, pp. 22, 31)

153. Construction of the proposed facility would not impact the wetland or watercourse. (Cellco 1, Attachment 10; p.3)
154. Erosion control blankets would be specified to stabilize steep slope areas such as the embankments for the access drive, consistent with the E&S Guidelines. The blankets would be seeded to promote a stable vegetated slope. The blankets would also be composed of 100 percent natural fiber to reduce the possibility for wildlife entanglement. (Cellco 1, Attachment 10)
155. Pursuant to C.G.S. §22a-430b, a DEEP Stormwater Permit is required for any disturbance greater than 1 acre. The construction limit of disturbance for the proposed site is approximately 0.16-acre; therefore, the project would not require a DEEP Stormwater Permit (C.G.S. §22a-430b; DEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. (DEEP-WPED-GP-015); Cellco 4, response 15)
156. A riprap-lined swale and infiltration basin would be installed along the western side of the driveway. Generally, the waterflow would discharge down the forested hillside towards Chamberlain Road. (refer to Figure 11) (Cellco 1, Attachment 1; Tr. 1, pp. 36-38)

Forests and Parks

157. The nearest park is East Windsor Park located approximately 1.2 miles to the northeast. (Cellco 1, Attachment 8)
158. Approximately 18 trees greater than 8-inches diameter at breast height, including dead trees, would be removed. (Tr. 1, p. 24-25)

Fish and Wildlife

159. The site is not adjacent to DEEP-designated cold-water habitat. Development of the site would not affect fish passage. (Council Administrative Notice Item No. 47; Cellco 1, Attachment 9)
160. DEEP Natural Diversity Database (NDDB) maps show approximate locations of state-listed endangered, threatened, and special concern species and can be used to find areas of potential conservation concern. (Council Administrative Notice Item No. 76)
161. The proposed facility is not located within a NDDB buffer area. (Cellco 1, Attachment 9; Council Administrative Notice Item No. 76)
162. The site is within the range of the northern long-eared bat (NLEB), a federally-listed and state-listed endangered species. There are no known NLEB hibernacula or known maternity roost trees within 0.25 miles and 150-feet, respectively, of the proposed facility. By letter dated June 5, 2023, the U.S. Fish and Wildlife Service (USFWS) determined that the project would not likely have an adverse effect on the NLEB, and no additional action is necessary. (Cellco 1, Attachment 9)
163. The nearest Important Bird Area (IBA) to the proposed site is the Station 43 Marsh/Sanctuary located 5.37 miles to the southeast in the Town of South Windsor. The proposed facility would not affect the IBA. (Council Administrative item No. 81)
164. The proposed facility would comply with the USFWS telecommunications tower guidelines for minimizing the potential for impact to bird species. (Cellco 1, p. 15)

Agriculture

165. Prime farmland soils are located within the host parcel. The proposed access driveway will disturb a total of 0.16 acres of the 3.3 acres of Prime Farmland Soils on the Property. (Cellco 1, Attachment 12; Cellco 4, response 15)
166. The host parcel does not contain productive agricultural fields. (Cellco 4, response 14)
167. No prime farmland soils are located within the proposed facility compound. (Cellco 1, Attachment 12)

Scenic, Historic and Recreational Values

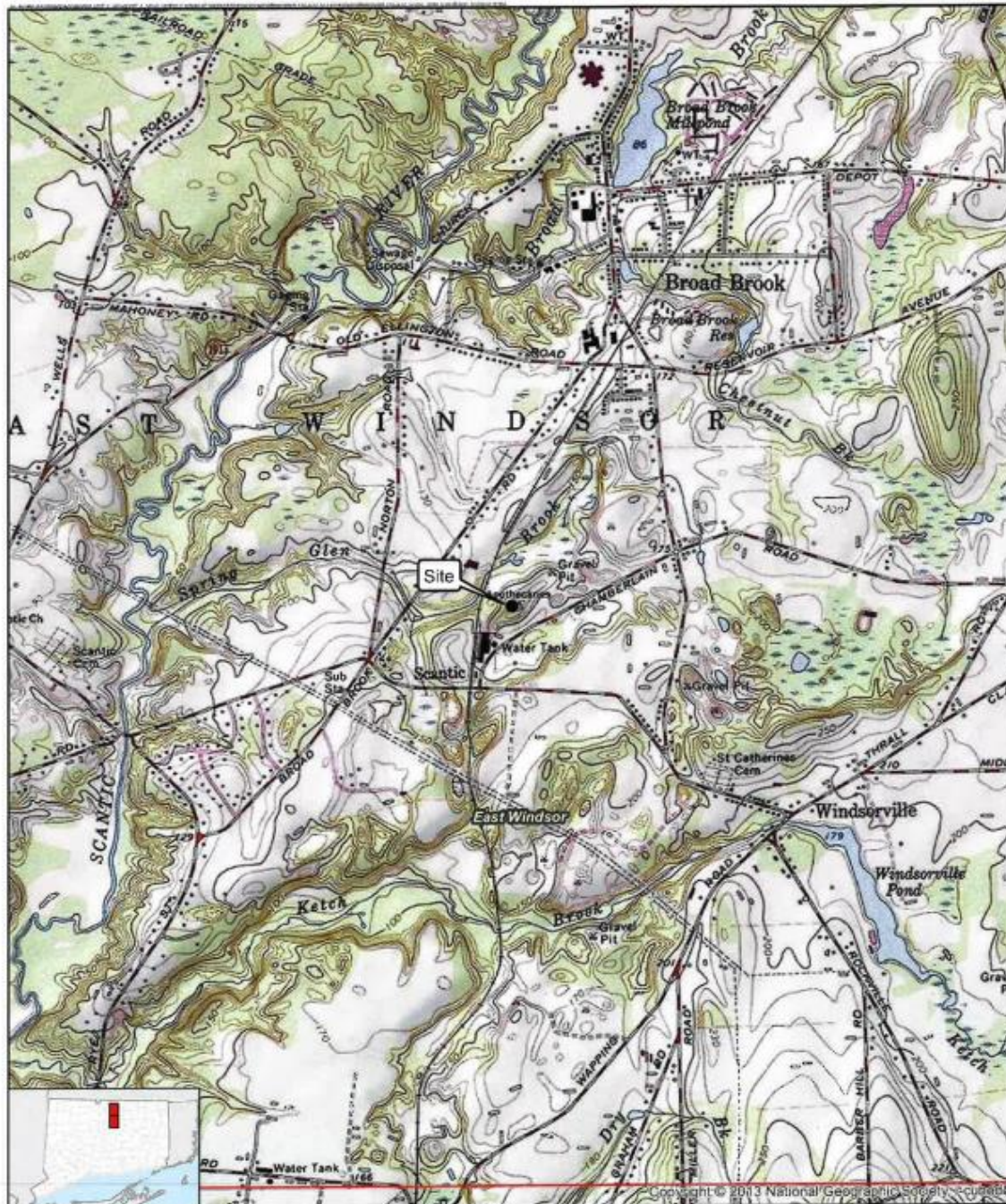
168. No resources listed on the State or National Register of Historic Places were identified within 0.5 mile of the proposed site. By letter dated July 7, 2023, SHPO determined the project would have no effect on historic or archeological resources. (Cellco 1, Attachment 11)
169. There are no “blue-blazed” hiking trails maintained by the Connecticut Forest and Park Association within two-miles of the site. (Cellco 1, Attachment 8; Council Administrative Notice No. 81)
170. No comments were received from the Town, OPM or DEEP regarding any impacts to scenic quality or resources. (Record)

Visibility

171. Property owners have no right to an unobstructed view from structures built on adjacent property except where there is an express statutory provision or there is a contract or restrictive covenant protecting the private right to a view or vista. (*Mayer v. Historic District Comm'n of Town of Groton*, 325 Conn. 765 (2017); C.G.S. §47-25 (2023))
172. Cellco used a combination of predictive computer models, in-field analysis, and a review of various data sources to evaluate the visibility of the proposed facility. (Cellco 1, p. 13-14, Attachment 8)
173. On May 18, 2022, Cellco conducted a balloon test and field reconnaissance at the proposed tower site to assist in the visibility evaluation. The balloon test consisted of flying a four-foot diameter helium filled balloon to a height of approximately 120-feet agl at the proposed site. An in-field reconnaissance was then performed from publicly accessible locations in the surrounding area to determine where the proposed tower would be visible. The in-field reconnaissance included photographs taken from various areas around the site. (Cellco 1, Attachment 8)
174. Information obtained during the field reconnaissance was incorporated into a viewshed map that depicts areas with year-round visibility within a two-mile radius (8,042 acres) of the site (Study Area) based on computer modeling and in-field observations from publicly-accessible locations. (Cellco 1, Attachment 8)
175. Based on the final viewshed analysis (refer to Figure 12), the proposed tower would be visible year-round from approximately 78 acres (0.97% of the Study Area). (Cellco 1, Attachment 8)
176. The tower would be seasonally visible (leaf-off conditions) from approximately 276 acres (3.4% of the Study Area). Seasonal visibility would account for approximately 78% of the total predicted visibility area of 354 acres. (Cellco 1, Attachment 8)

177. Year-round visibility would occur in open fields within one mile of the site. Seasonal visibility would occur within one mile of the site. (Cellco 1, Attachment 8)
178. Stealth tower options were not considered due to the industrial nature of the area. (Cellco 4, response 36)
179. A monopine facility would not blend into the area due to the surrounding tree canopy height of approximately 60 feet and lack of coniferous trees in the area. (Tr. 1, pp. 17, 18)
180. A water tower facility may fit into the surrounding agricultural area; however, would require a larger footprint for the compound and foundation. (Tr. 1, p. 18)
181. Pursuant to C.G.S. §16-50p(a)(3)(F), for a telecommunications proposed to be installed on land near a building containing a school, the facility will not be less than 250 feet from the building containing the school unless the location is acceptable to the chief elected official of the municipality or the Council finds that the facility will not have a substantial adverse effect on the aesthetics or scenic quality of the neighborhood in which such school is located. (C.G.S. §16-50p(a)(3)(F) (2023))
182. No schools or commercial child day care facilities are located within 250 feet of the site. The nearest building containing a school or commercial day care is Broad Brook Elementary School located approximately 0.8 miles north/northeast of the proposed facility site. (Cellco 1, Attachment 8)

Figure 1 – Site Location – Topographic Map



Legend
 ● Site
 □ Municipal Boundary

Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrangle Map, Broad Brook, CT (1994) and
 Mercheater, CT (1992)
 Map Scale: 1:24,000
 Map Date: October 2022



Site Location Map
 Proposed Wireless
 Telecommunications Facility
 Broadbrook RELO CT
 11 Chamberlain Road
 East Windsor, Connecticut



Figure 2 – Site Location – Aerial Image



- Legend**
-  Sites
 -  Subject Property
 -  Approximate Parcel Boundary

Map Notes:
Base Map Source: CT EDO 2019 Imagery
Map Scale: 1 inch = 500 feet
Map Date: October 2023



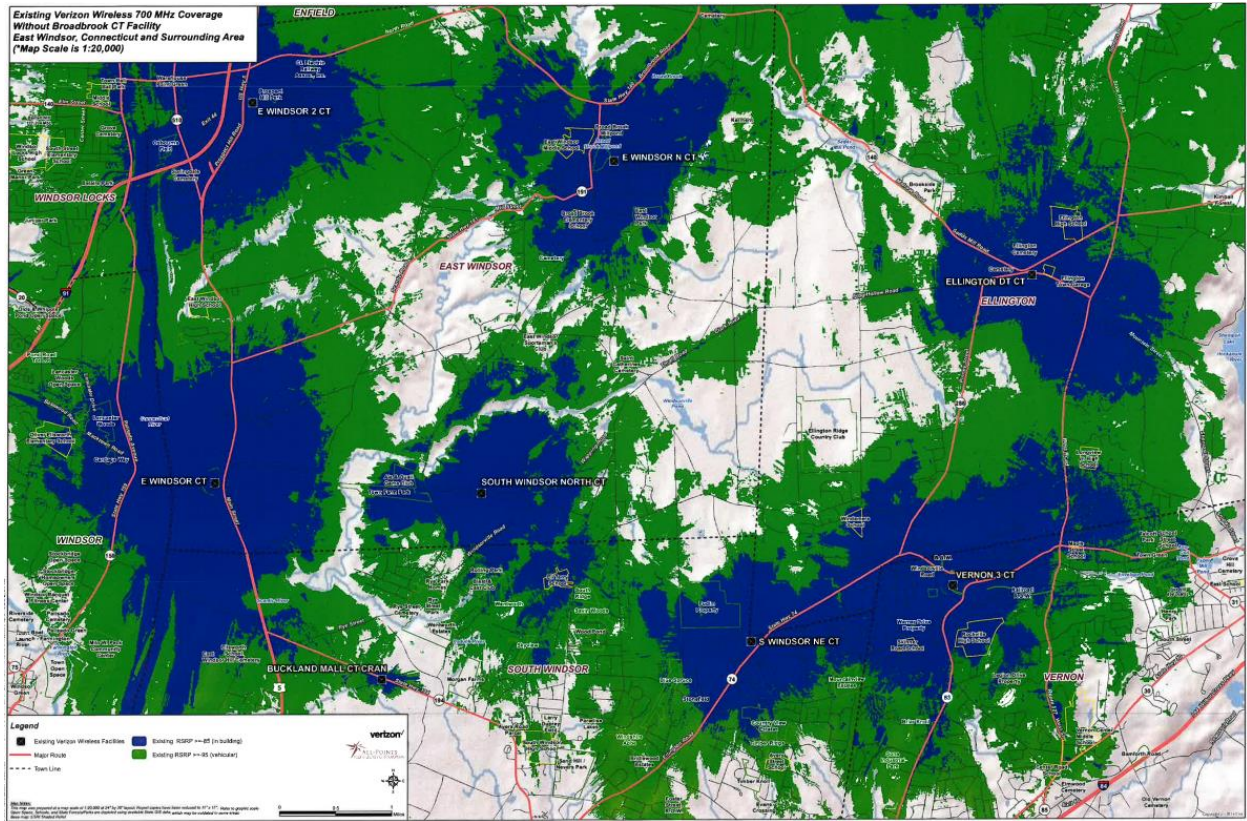
Site Location Map
Proposed Wireless
Telecommunications Facility
Broadbrook RELO CT
11 Chamberlain Road
East Windsor, Connecticut



Figure 3 – Site Location – Site Schematic

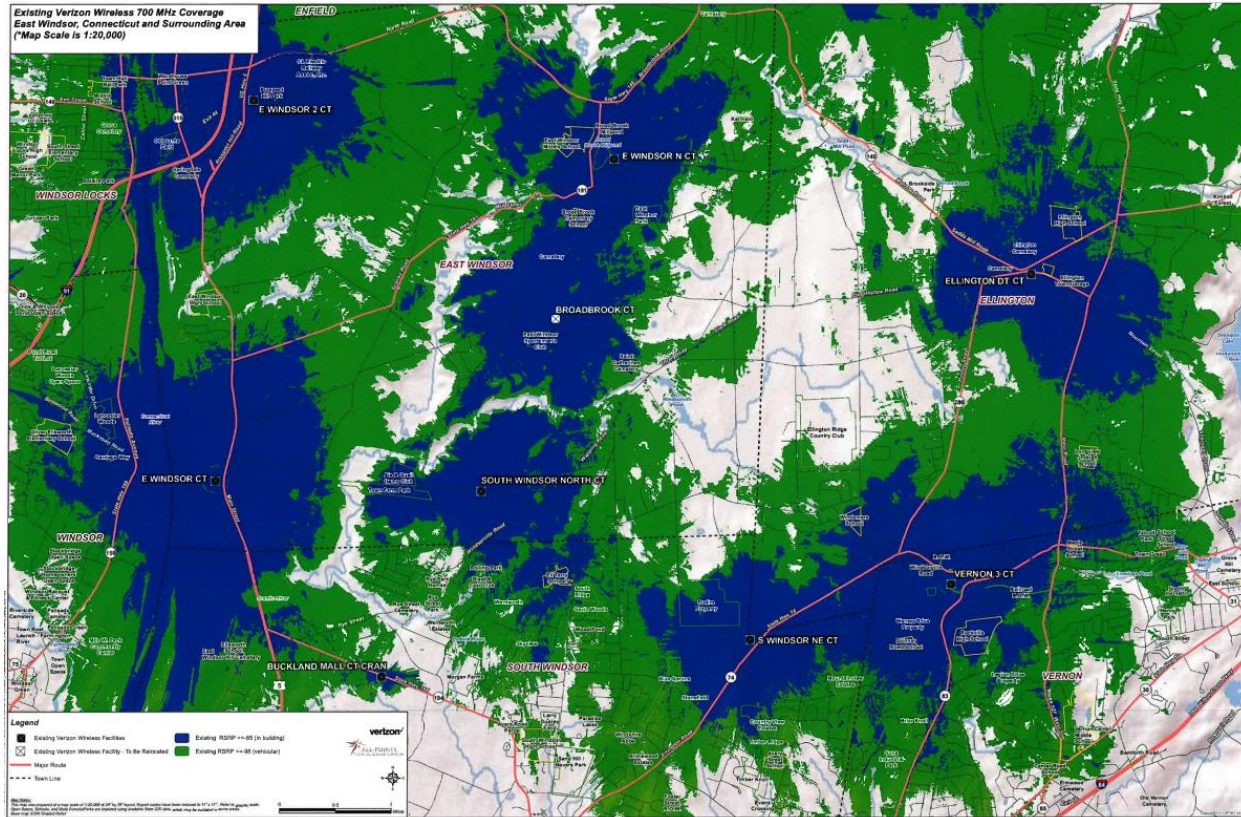


Figure 4 – Cellco Adjacent Sites and 700 MHz coverage without Broadbrook site



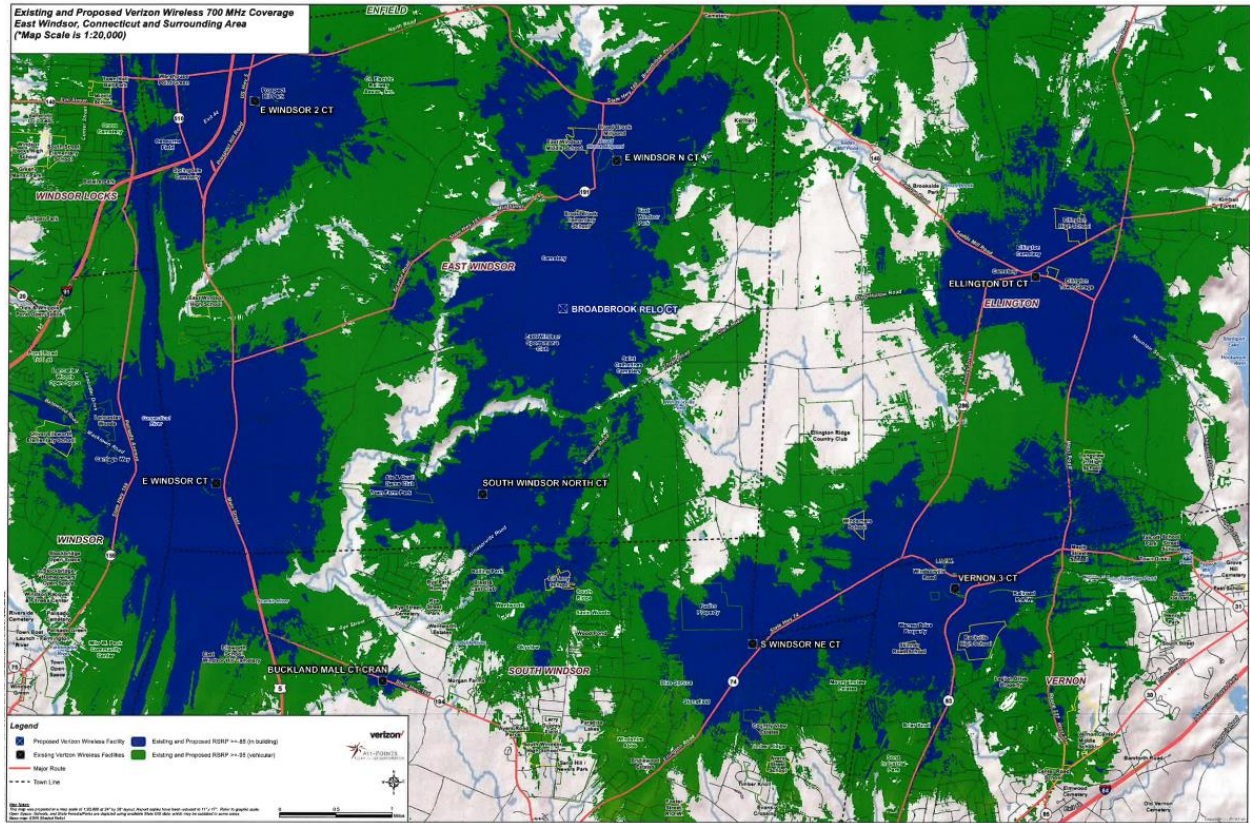
(Attachment 6 p1)

Figure 5 – Cellco Existing 700 MHz Coverage



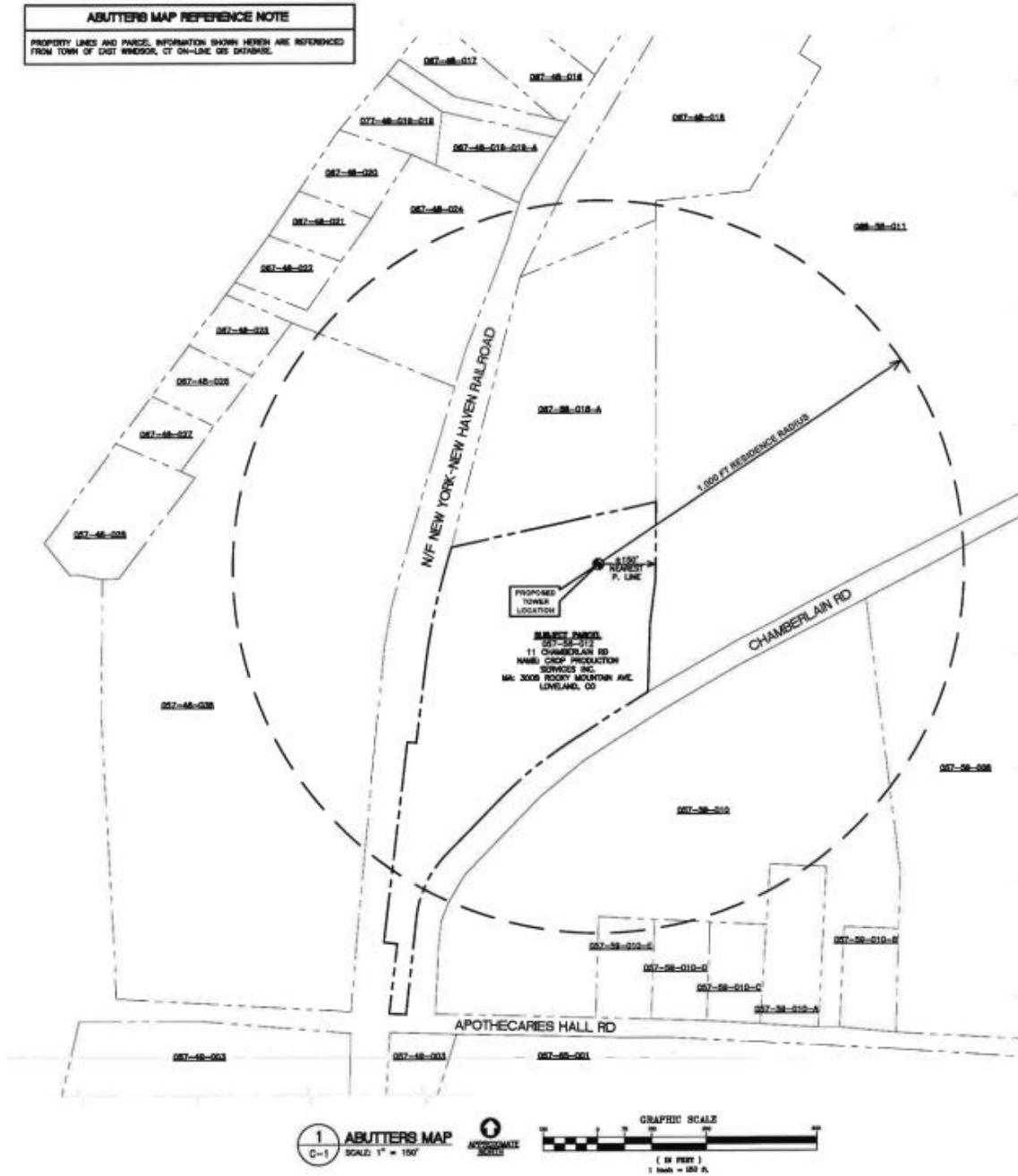
(Attachment 6 p2)

Figure 6 – Cellco Existing and Proposed 700 MHz Coverage



(Attachment 6 p3)

Figure 7- Site Plan Overview



(Cellco 1, Attachment 1)

Figure 8– Site Plan detail

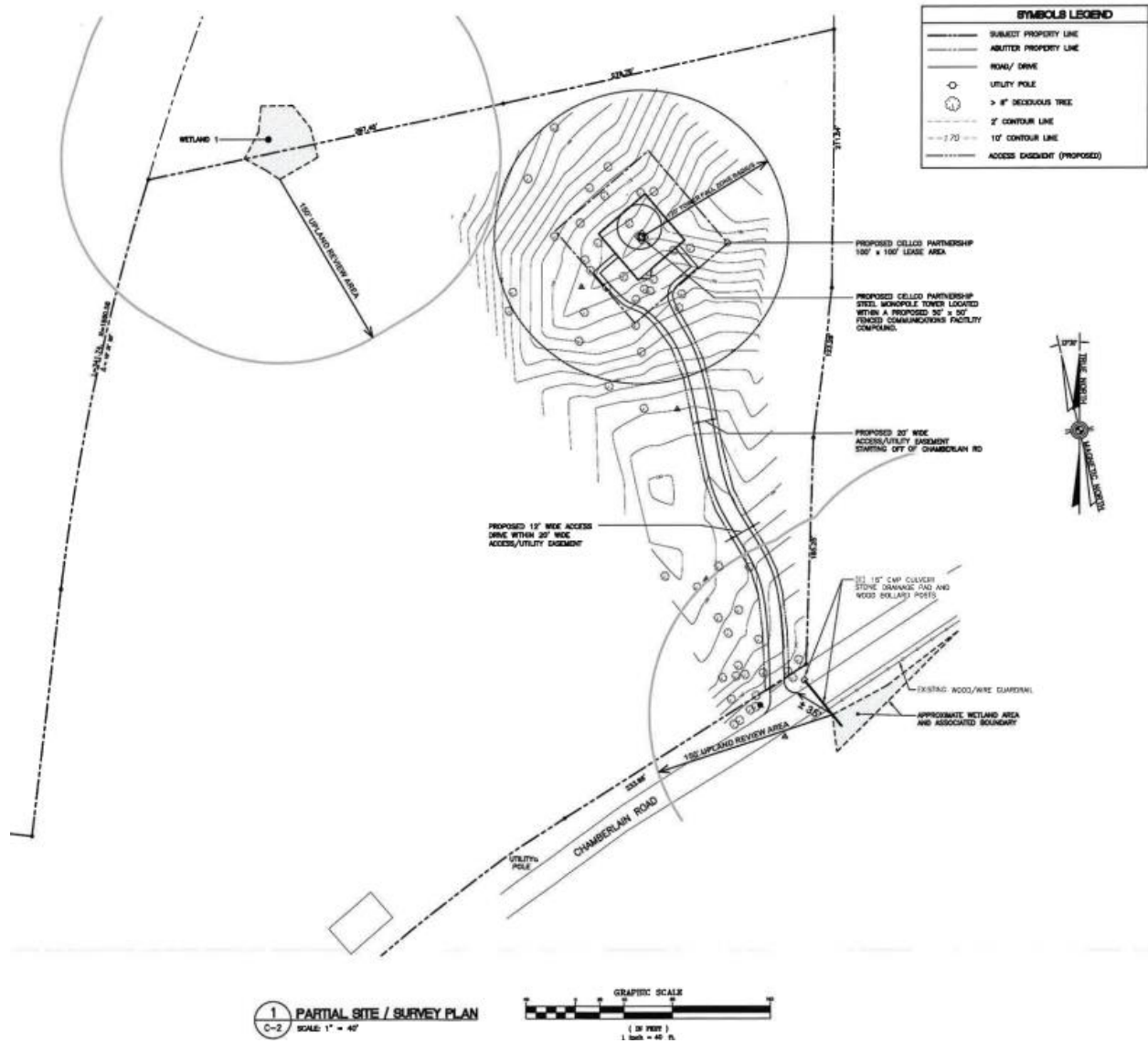
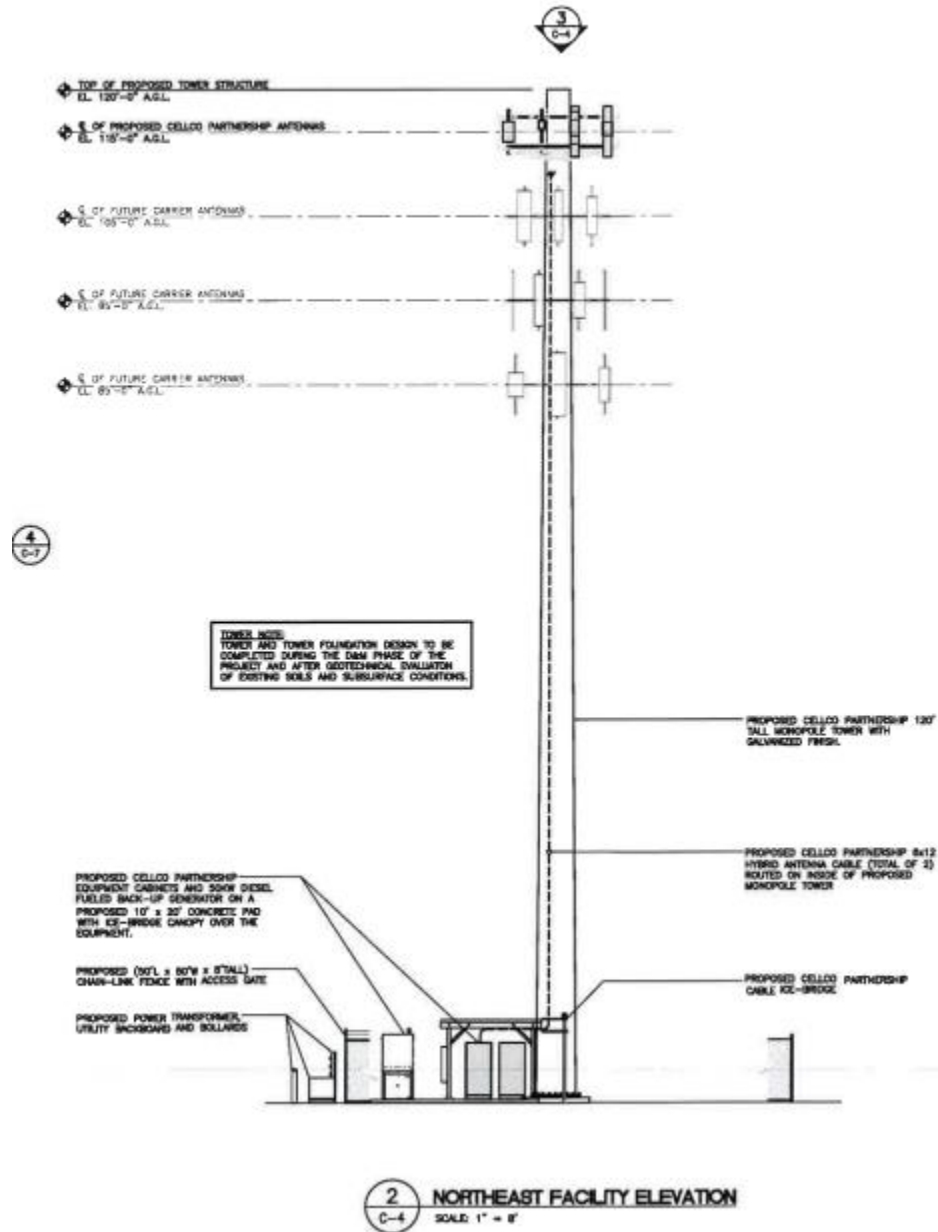


Figure 9 – Tower Plan



(Cellco 1, Attachment 1)

Figure 10 –Site Plan



Legend

- Proposed Verizon Wireless Monopole
- Proposed Verizon Wireless Site Layout
- Subject Property
- Approximate Parcel Boundary
- 150' Upland Review Area
- Approximate Wetland Boundary
- Delineated Wetland Boundary
- Approximate Wetland Area
- Vernal Pool
- Culvert

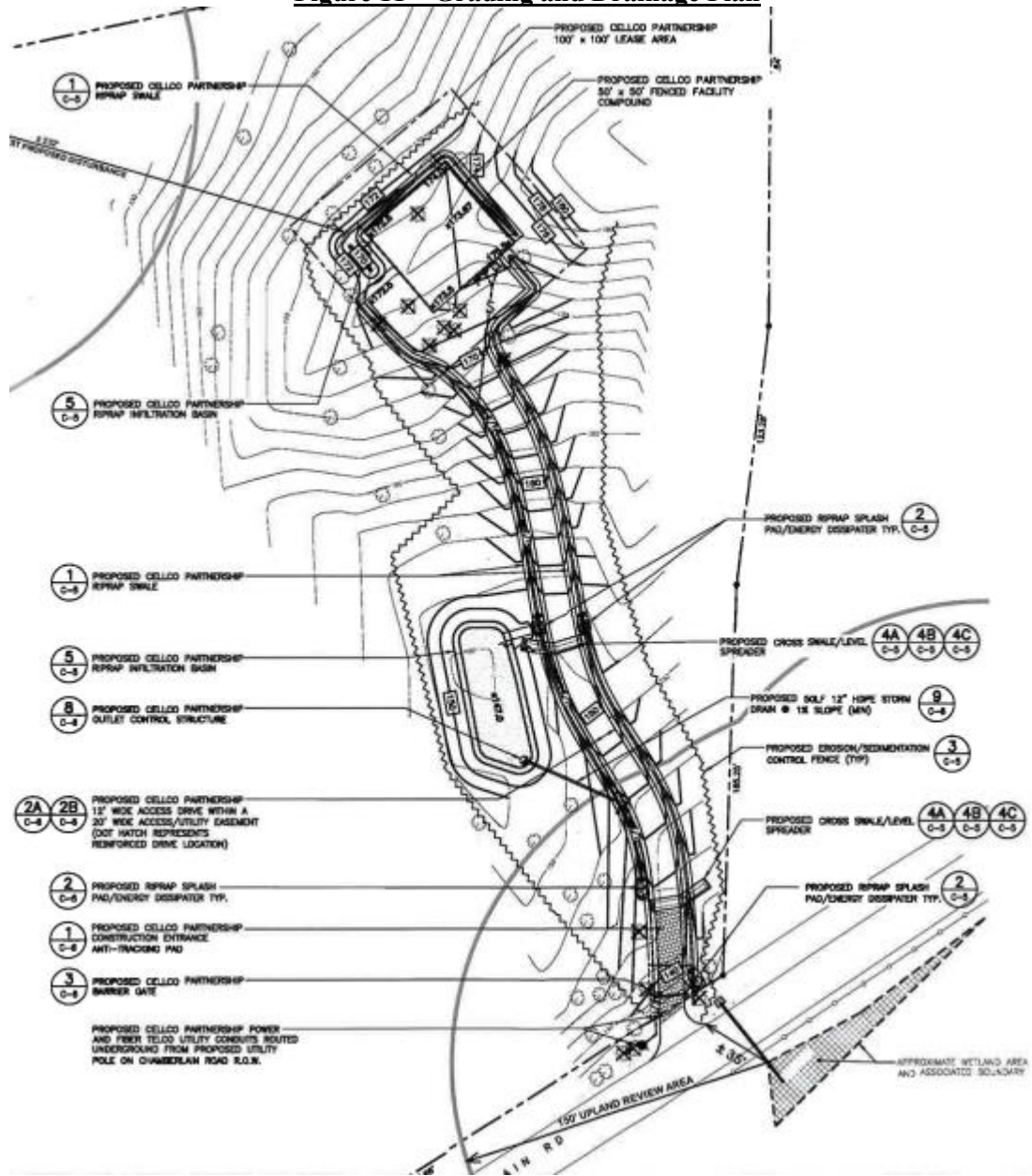
Wetland Inspection Map

Proposed Wireless
 Telecommunications Facility
 Broadbrook RELO CT
 11 Chamberlain Road
 East Windsor, Connecticut

Map Date:
 Base Map Source: 2019 Aerial Photograph (CTGEO)
 Map Scale: 1 inch = 200 feet
 Map Date: March 2023

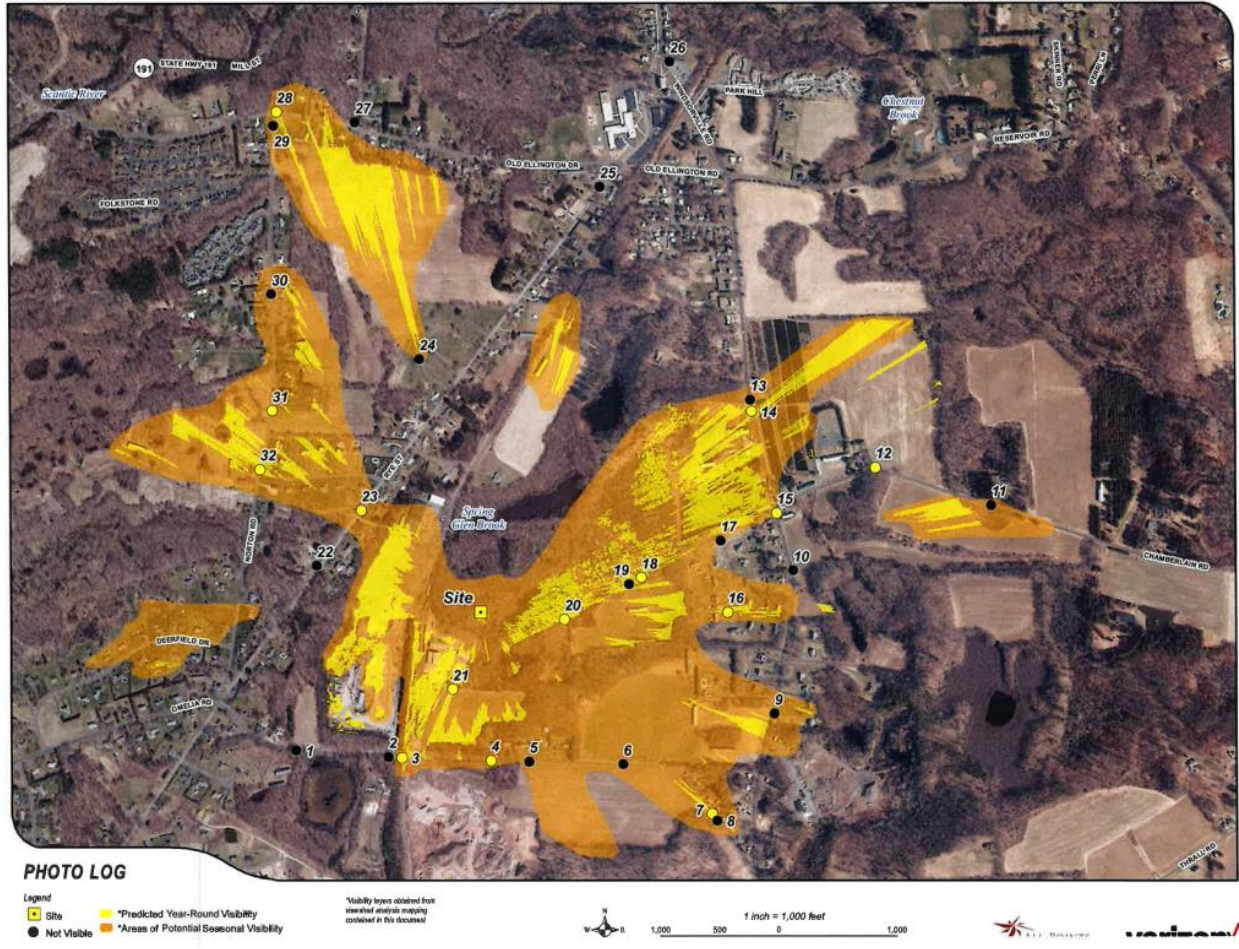


Figure 11 – Grading and Drainage Plan



(Celco 1, Attachment 1)

Figure 12 – Proposed Site Visibility Analysis



(Cellco 1, Attachment 8)

Visibility Analysis Map Photolog

Table 1 - Photo Locations

Photo	Location	Orientation	Distance	Visibility
1	APOTHECARIES HALL ROAD	NE	+/- 0.37 MILE	NOT VISIBLE
2	APOTHECARIES HALL ROAD*	NNE	+/- 0.28 MILE	NOT VISIBLE
3	APOTHECARIES HALL ROAD	NNE	+/- 0.26 MILE	VISIBLE
4	APOTHECARIES HALL ROAD	N	+/- 0.24 MILE	VISIBLE
5	APOTHECARIES HALL ROAD*	NNW	+/- 0.25 MILE	NOT VISIBLE
6	APOTHECARIES HALL ROAD**	NNW	+/- 0.33 MILE	NOT VISIBLE
7	APOTHECARIES HALL ROAD	NW	+/- 0.49 MILE	VISIBLE
8	APOTHECARIES HALL ROAD*	NW	+/- 0.50 MILE	NOT VISIBLE
9	WINDSORVILLE ROAD**	WNW	+/- 0.49 MILE	NOT VISIBLE
10	WINDSORVILLE ROAD**	W	+/- 0.50 MILE	NOT VISIBLE
11	CHAMBERLAIN ROAD**	WSW	+/- 0.84 MILE	NOT VISIBLE
12	CHAMBERLAIN ROAD	WSW	+/- 0.68 MILE	VISIBLE
13	WINDSORVILLE ROAD**	SW	+/- 0.56 MILE	NOT VISIBLE
14	WINDSORVILLE ROAD	SW	+/- 0.55 MILE	VISIBLE
15	WINDSORVILLE ROAD AT CHAMBERLAIN ROAD	WSW	+/- 0.50 MILE	VISIBLE
16	COBBLESTONE DRIVE**	W	+/- 0.40 MILE	VISIBLE
17	COBBLESTONE DRIVE AT CHAMBERLAIN ROAD	WSW	+/- 0.41 MILE	NOT VISIBLE
18	CHAMBERLAIN ROAD	WSW	+/- 0.27 MILE	VISIBLE
19	CHAMBERLAIN ROAD**	W	+/- 0.24 MILE	NOT VISIBLE
20	CHAMBERLAIN ROAD*	W	+/- 0.14 MILE	VISIBLE
21	CHAMBERLAIN ROAD*	NNE	+/- 0.13 MILE	VISIBLE
22	RYE STREET	ESE	+/- 0.27 MILE	NOT VISIBLE
23	RYE STREET	SE	+/- 0.25 MILE	VISIBLE

*Photograph was taken at 35 mm focal length.
 **Photograph was taken at 24 mm focal length.

Table 1 - Photo Locations Continued

Photo	Location	Orientation	Distance	Visibility
24	ST. CATHERINE CEMETERY	SSE	+/- 0.42 MILE	NOT VISIBLE
25	RYE STREET	SSW	+/- 0.71 MILE	NOT VISIBLE
26	WINDSORVILLE ROAD	SSW	+/- 0.94 MILE	NOT VISIBLE
27	STILES ROAD AT OLD ELLINGTON ROAD	SSE	+/- 0.81 MILE	NOT VISIBLE
28	OLD ELLINGTON ROAD AT NORTON ROAD	SSE	+/- 0.86 MILE	VISIBLE
29	NORTON ROAD	SSE	+/- 0.85 MILE	NOT VISIBLE
30	NORTON ROAD	SSE	+/- 0.61 MILE	NOT VISIBLE
31	NORTON ROAD	SE	+/- 0.46 MILE	VISIBLE
32	NORTON ROAD AT HAYFIELD LANE	SE	+/- 0.42 MILE	VISIBLE

*Photograph was taken at 35 mm focal length.
 **Photograph was taken at 24 mm focal length.