



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

April 3, 2020

Lucia Chiocchio, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601

RE: **DOCKET NO. 488** - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut.

Dear Attorney Chiocchio:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 17, 2020. To help expedite the Council's review, please file individual responses as soon as they are available. Please provide an electronic copy to this office only.

Copies of your responses shall be provided to all parties and intervenors listed on 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,

s/Melanie Bachman

Melanie Bachman
Executive Director

c: Parties and Intervenors

MB/RM/CW

**Docket 488 - Kent
Homeland Towers, LLC and New Cingular Wireless PCS, LLC**

**Pre-Hearing Interrogatories – Set One
April 3, 2020**

General

1. Were return receipts received for each abutting landowner identified in the Application Attachment 13? If not, list the abutters that did not receive notice and describe any additional effort to serve notice.
2. Pursuant to Connecticut General Statutes (CGS) §16-50o, please submit a copy of the lease for the proposed sites.
3. Pursuant to CGS 16-50/(b), please submit a copy of the publisher's affidavit for the notice of intent to file the application with the Council.

Site/Tower

4. What measures are proposed for the site to ensure security and deter vandalism? (alarms, gates, locks, etc.)
5. What type of tower foundation is anticipated at the proposed sites? Would blasting be necessary to install either foundation?
6. Would the tower and foundation at both sites be designed to accommodate an increase in tower height?
7. For Site A, why was a location close the west and south property lines chosen rather than a location centrally located on the parcel?
8. Application p. 23 states Site B is located within the Town of Kent's Horizonline Conservation District. Could the tower site be located west, outside of the Horizonline Conservation District? If so, what is the ground elevation of a suitable location and what tower height would be necessary to provide wireless services?
9. Provide a legible copy of the Horizonline Conservation District map that includes the locations of both sites.
10. Referring to Application Attachment 5- Site B, the property boundaries in the aerial image and on Site Plan SP-1 do not appear to match. Please clarify. What lot lines were used to generate the information in Attachment 6?
11. Would the construction of Site B impact the on-site well or septic system? How would these on-site systems be protected?
12. Referring to Application Attachment 2, Site J, what type of wetland/watercourse crossing is necessary to develop an access road? Could the crossing be accomplished with partial filling /culverts? Provide more information regarding the slopes in the rear of the parcel.

13. Referring to Application Attachment 2, provide a legible, larger scale depiction of the *Aerial Map of Homeland Towers search and proposed site* image, including a scale.
14. Regarding the proposed landscaping at both proposed sites, what type of evergreens would be installed and at what height at planting?

Environmental

15. Do the proposed sites contain any Prime Farmland Soils and/or Statewide Important Farmland Soils? If so, provide the acreage of disturbance of these soils for each site.
16. Referring to Application p. 20, has the State Historic Preservation Office responded to the Applicant regarding Site B? If so, please provide correspondence.
17. Are the proposed sites located within the Upper Housatonic Valley National Heritage Area? If so, describe the potential impacts on resources within the heritage area. What is the purpose of the heritage area? Does the designation prevent the construction of telecommunications facilities?
18. Are there any National Audubon Society designated "Important Bird Areas" within two miles of the proposed sites? If so, would the proposed towers have any effect on the areas?
19. Would the proposed towers comply with recommended United States Fish and Wildlife Service guidelines for minimizing potential impact to bird species? Please explain.
20. The visibility analysis for both sites states there are limited views from local hiking trails based on an in-field reconnaissance. What local hiking trails were surveyed?
21. Referring to Visibility Analysis Site A:
 - a) photo #12- is there an adjacent house that would have this seasonal view? If Site A was developed, would some of the trees obscuring the tower be removed for the access road and compound making the tower more visible? (same with photo #13)
 - b) photo #13 – estimate the number of homes/cottages that would have year-round views of the proposed site from South Spectacle Lake. Estimate the height of the tower above the treeline that would be visible from these homes/cottages.
 - c) For areas with projected visibility from North Spectacle Lake, is there residential/cottage shoreline development? Please describe. Estimate the height of the tower above the treeline that would be visible from these developed areas.
 - d) Estimate the number of residences/cottages with year round and seasonal visibility within a 0.5 mile radius of the site.
22. Referring to Visibility Analysis Site B:
 - a) photo #29- is the residence shown owned by the landlord? If Site B was developed, would some of the trees obscuring the tower be removed to develop the site making the tower more visible?
 - b) photo #31 – is the residence shown owned by the landlord?
 - c) Estimate the number of homes/cottages that would have year-round views of the proposed site from South Spectacle Lake. Estimate the height of the tower above the treeline that would be visible from these homes/cottages.
 - d) Estimate the number of residences/cottages with year round and seasonal visibility within a 0.5 mile radius of the site.

23. For the photos taken from the Iron Mountain Preserve (Site A#36, Site B#43) it appears the photo-location is in a valley area rather than on top of Iron Mountain. What is the expected view of the sites from the top of Iron Mountain? Are there open vistas on Iron Mountain?
24. Was a faux tree tower considered at the proposed sites? Using the tower photo-simulations already submitted in the application, provide photo-simulations of a faux tree tower from representative areas for each site.

Public Safety

25. Can municipal antennas be installed at both the lower portion and at the top of a tree tower? What faux branch modifications may be necessary to accommodate the emergency services antennas?
26. Identify the safety standards and/or codes by which equipment, machinery, or technology that would be used or operated at the proposed facility.
27. Application p. 22 states noise would be generated by heating, air conditioning and ventilation systems. Would the operation of this equipment comply with Department of Energy and Environmental Protection noise control standards at adjacent property lines? What studies were done to ensure compliance?

Proposed Wireless Services

27. Have any other commercial wireless carriers expressed an interest in co-locating on the proposed facility to date? If so, which carrier(s) and at what proposed tower height(s)?
28. The application states that AT&T seeks to provide wireless service to key traffic corridors through residential areas of Town. The accompanying radio frequency reports in Attachment 1 include charts which list miles of coverage on main and secondary roads. Identify the main roads that would be served by the proposed sites.
29. Referring to the radio frequency reports – Table 1 includes the estimated existing coverage gaps in the vicinity of the proposed sites. What was the radius or other type of measurement used to identify the “vicinity”. Is the vicinity limited to a specific area of Kent, or is it to the Kent town boundaries?
30. Was the intent of the proposed sites to provide service to the entire area identified as the “vicinity”? If not, what are the specific areas and/or roadways that are the focus of the proposed coverage? Is the area of need predominately residential or commercial?
31. The radio frequency reports refer to a drive test that was conducted to assist in determining a need for a facility. Please provide the drive test data.
32. Application Attachment 9 indicates other frequencies will be installed in addition to the 700 MHz frequency. Does the 700 MHz frequency act as the base frequency of the network where most of the wireless traffic occurs? How do the other frequencies interact in AT&T’s wireless system?
33. Town documents in Application Attachment 12 indicate a 175-foot tower was initially contemplated at Site B. Why was the tower height reduced to 154 feet? How did this reduction affect the proposed wireless service?

34. Referring to Application Attachment 2, Site AA was rejected do to coverage concerns. What height was modeled? In what areas was coverage deficient? Provide a coverage plot from this property.
35. Referring to Application Attachment 2, rejected Site J is further west and downgradient of the two proposed sites. What was the intended coverage area for this site?
36. Were any studies conducted on the Town's wireless service requirements? Is it necessary to install municipal/emergency response antennas at the top of the tower? What site is preferred by the Town/emergency responders based on wireless service needs?

Backup Power

37. Would the proposed emergency generator run periodically for maintenance purposes? If so, at what frequency and duration? Could such testing be scheduled for daytime hours?
38. If power is lost, does the emergency generator start immediately or is there a temporary loss of power affecting service? Is there a battery unit associated with the cabinet to prevent a reboot condition?
39. Is the Town of Kent proposing an emergency power source for its equipment? If so, provide specifics.
40. Could an emergency generator be installed at the site to provide emergency power to both New Cingular Wireless and the Town of Kent's equipment?