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July 23, 2025

Via Electronic Mail and Federal Express

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

Re: **Docket No. 536 – Tarpon Towers III, LLC and Cellco Partnership d/b/a Verizon Wireless application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at 78 Goshen East Street in Norfolk, Connecticut**

Dear Attorney Bachman:

On behalf of Tarpon Towers III, LLC and Cellco Partnership d/b/a Verizon Wireless (collectively the "Applicant"), enclosed please find the original and fifteen (15) copies of the Applicant's responses to the Council's Interrogatories (Set One) for Docket No. 536. 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,

Jonathan H. Schaefer

Enclosure

32625228-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF TARPON TOWERS III, LLC AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 78 GOSHEN EAST STREET, NORFOLK, CONNECTICUT	:	DOCKET NO. 536
	:	JULY 23, 2025

RESPONSES OF TARPON TOWERS III, LLC AND CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL INTERROGATORIES

On July 2, 2025, the Connecticut Siting Council ("Council") issued Interrogatories to Tarpon Towers III, LLC ("Tarpon") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), relating to Docket No. 536. Below are the Applicant's responses.

Notice

Question No. 1

Referencing Application Attachment 4, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?

Response

The Applicant received green card receipts from all but three abutting landowners. According to the USPS Tracking website Robert Shannon Peckham and Rebecca Frances Peckham received the certified mailing, but the green card was not returned. Notice to Robert D. Maltby, III was returned marked "Return to Sender, Unclaimed, Unable to Forward". Notice to

Mr. Maltby was resent by regular mail on May 12, 2025. Notice to Michael Giannamore was not returned, no green card has been received, and according to the USPS Tracking website the notice is "moving through network." Notice was resent to Mr. Giannamore by regular mail on July 7, 2025.

Question No. 2

Referencing Application p. 5, have the Applicants received any comments since the Application was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Response

The Applicant has not received any comments from the Town or the public since the Application was submitted to the Council. The Applicant received, through the Council, comments from the Council on Environmental Quality on May 28, 2025.

Question No. 3

Describe outreach efforts to each member of the State legislature whose district encompasses the proposed facility site.

Response

Pursuant to Conn. Gen Stat. Section 16-50*l*(b) a copy of the Application was sent to State Legislators representing the Town of Norfolk. (*See* Application p. 5 and Tab 2).

Question No. 4

Referencing Application pp. 19-20, other than the request for a review of alternative sites, what concerns were expressed by members of the public at the March 6, 2025 Public Information Meeting and how were these concerns addressed?

Response

In addition to the consideration of additional alternative sites members of the public

expressed concerns for:

1. Visibility of the tower. In response, the Applicant agreed to conduct a second balloon float and provided neighbors with notice of the time and date so that interested neighbors and Town officials could view the balloon. The second balloon float occurred on April 15, 2025 between 8 a.m. and 12:45 p.m. Notice was provided to the Town and the neighbors.

2. Impacts on Etsy Road during construction. The Applicant said that it would work with the Town and its site contractor in advance of construction to ensure that impacts to Etsy Road are minimized and if damage occurs, promptly repaired. Also, a lattice tower, like the one proposed here, is more easily delivered to a construction site than a monopole tower might be, coming in sections of roughly 40 to 53.5 feet in length. The smaller components of a lattice tower are easier to deliver to a site with access challenges like this one and will be constructed on-site.

3. Is the site really needed. The Applicant responded to this claim by sharing coverage plots and information about the existing and proposed service in South Norfolk, demonstrating a need to improved wireless service. In addition, the Town's First Selectman Matthew T. Riiska also spoke about the significant emergency service communications problems the Town has experienced over the years, especially in South Norfolk.

Site Search

Question No. 5

Referring to Application Attachment 8 - Site Search Summary, Location 2, what ground elevation and tower heights were examined?

Response

A ground elevation of 1,240 feet was examined as it was approximately the highest elevation on the parcel. This ground elevation was examined along with antenna heights of 120 feet, 140 feet, 160 feet, and 180 feet.

Question No. 6

Was the property abutting the host parcel to the south at 80 Goshen East Steet considered for a facility?

Response

The 80 Goshen East Street parcel was not considered, because the locations on that parcel with comparable ground elevation to the proposed location would have required an access road of over 2,000 feet resulting in greater disturbance to natural resources.

Question No. 7

Are small cells a feasible alternative to a new tower? Estimate the number of pole-mounted small cells that would be required for reliable service within the proposed service area. Would certain frequencies be limited through the use of small cells? What would be the cost of each small cell for both the use of existing utility poles and new poles specific for small cells. What type of equipment would be attached to each pole?

Response

It may be theoretically and technically possible to install a large number of small cells or Distributed Antenna System (DAS) nodes in the area that could closely match the coverage footprint of the proposed Norfolk South Facility (macro cell). Such an approach, however, is not practically nor economically feasible and is not consistent with good RF Engineering practice. Typically, small cell facilities or DAS nodes involve the installation of a single cannister antenna, an individual radio head, and related electrical and fiber optic connections. Small cells

would utilize existing infrastructure (i.e., electric distribution poles) along public rights of way in areas where coverage and/or capacity problems exist. These existing utility poles are often encumbered by other equipment (i.e., transformers, streetlights, and risers) that will limit Cellco's ability to use the pole. Structural limitations of the existing poles could also limit Cellco's ability to deploy all the equipment needed to provide service in all of its operating frequencies. Providing some form of back-up power to small cells or DAS nodes is very difficult and, in many cases, impossible, making the service even more vulnerable to storms. In areas where this existing infrastructure is not available, for example, along private roads or on private and municipal properties, property rights would need to be acquired and new poles would need to be installed. The actual number of small cell facilities that would be needed to provide a service comparable to that from the proposed Norfolk South Facility is not known but would be significant given the overall size of the area that Cellco is attempting to serve with the proposed Norfolk South Facility. Individual small cells would be capable of providing service in some but not all of Cellco's operating frequencies, further limiting network capacity in the area around the proposed Norfolk South Facility. Cellco estimates the cost for each small cell installation to be approximately $75,000.

Proposed Site

Question No. 8

Referencing Application Attachment 1, Sheet C-1 and Application Attachment 18, is the proposed non-exclusive easement for access to the facility site designated for shared use with any abutting property owners? Has a land survey been completed?

Response

The non-exclusive easement for access and utilities referenced is not shared by any abutting owner. Tarpon's use of this area is not exclusive to Tarpon and would still be available

for use by the property owner. A survey of the access easement area has been completed.

Question No. 9

Why was the proposed access drive located along Estey Road rather than along Goshen East Street? Is there a street address for the proposed site at the Estey Road access point? Explain.

Response

According to the Town of Norfolk's accessor database the proposed site has one address – 78 Goshen East Street. The access way off Estey Road was selected because it is a shorter route overall and would require fewer trees to be removed and less site grading to access the tower compound area. It was also the only access option offered by the property owner.

Proposed Facility and Associated Equipment

Question No. 10

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. 11

How is the construction cost of the facility recovered for both Tarpon and Cellco?

Response

Tarpon's costs associated with site development are recovered by leasing space on the tower to wireless entities (tenants) like, Cellco. For Cellco, the costs associated with providing customers with the nation's most reliable wireless service network, including the cost for development of network infrastructure (small cells and macro-cells), are paid for by the

individuals, corporations and government entities that purchase Cellco's wireless service.

Question No. 12

Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which 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. 13

What is the current design standard and maximum wind speed tolerance for the tower and the antennas/antenna mounts on the proposed tower?

Response

The applicable standard is ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures."

Question No. 14

What is the face width of the proposed lattice tower at grade, at 100 feet above ground level and 160 feet above ground level?

Response

The face width of the lattice tower is expected to be approximately 22.5 feet at the base; approximately 12.5 feet at 100 feet above ground level, and approximately 6.5 feet at 160 feet above ground level.

Cellco Proposed Wireless Services

Question No. 15

Are all frequencies used to transmit voice and data?

Response

Yes.

Question No. 16

Referencing Application p. 10, what is the distance and direction of each of the three existing macro-cell facilities from the proposed site?

Response

The proposed Norfolk South facility is located approximately 5.0 miles north of the Goshen Facility; approximately 5.2 miles southwest from the Norfolk East Facility; and approximately 5.3 miles south of the Norfolk West Facility.

Question No. 17

Can Cellco's capacity/coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect wireless service.

Response

No. Antennas at a centerline height of 180 feet at the proposed tower location is the minimum necessary to satisfy its coverage objectives and provide adequate coverage along portions of Route 272 and 63 and local roadways in all of Cellco's operating frequencies.

Question No. 18

What type of statistics/indicators did Cellco use to determine there is substandard service in this area?

Response

Cellco's service standard for Ineffective Attempts is under 0.5% and Lost Calls is under 0.6%.

Tower Site	**IA**	**LC**
Norfolk East	7%	4%
Norfolk West	2.5%	2%
Goshen	3%	10%

Question No. 19

Application Attachment 6 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 Cellco's wireless system?

Response

Yes, Cellco's 700 MHz frequencies act as a "base frequency" or the main coverage frequency for its network throughout Connecticut. This frequency handles a significant amount of Cellco's wireless traffic. All of Cellco's licensed frequencies (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 3700 MHz (5G)) are used, however, to transmit both voice and data services. Cellco customers transfer seamlessly between Cellco's operating frequencies during handoff between cell sites. Handoff can also occur between frequencies at an individual cell site for load balancing purposes. Subject to availability at a particular cell site, frequencies can also be used

together (a feature called "carrier aggregation") making more of the existing bandwidth available to a particular user.

Question No. 20

What is the signal strength for which Cellco designs its system? For in-vehicle coverage? For in-building coverage?

Response

Neg 85 dBm RSRP for in building coverage. Neg 95 dBm RSRP for in vehicle coverage.

Question No. 21

Is the proposed coverage area generally southwest, west and northwest of the site undeveloped, preserved forest lands with no residential development, except for Estey Road?

Response

The Great Mountain Forest is a large, preserved forest area to the northwest of the proposed tower site. It was also one of the sites the neighbors offered as a possible alternative proposed tower site. Land to the south and southwest includes low density residential development and undeveloped woodlands in Norfolk and Goshen.

Question No. 22

Referencing Application p. 8, what is the length of the service gaps on Routes 272 and 263?

Response

In preparation for these interrogatories, discrepancies were noted in the coverage maps in Application Attachment 6 that appear to have overpredicted proposed service from the proposed Norfolk South Facility and the existing facilities in the area due to the inclusion of service at -105 dBm signal level. As the Council is aware, and as noted in response to Question No. 20 above, the -105 dBm signal level does not meet Cellco's service reliability standard. The existing

and proposed coverage maps attached hereto as Exhibit 1 (*Modified Existing and Proposed Coverage Maps*) have been adjusted to show -85 dBm and -95 dBm signal levels from the proposed Norfolk South Facility and the existing facilities in the area. The responses to these interrogatories correspond directly to those modified existing and proposed coverage plots. No modifications to the "existing coverage" plots provided in Attachment 6 in the Application were required.

The existing gap in Cellco service along Route 272 is approximately 4.9 miles in the Norfolk and approximately 2.1 in Goshen. If approved, the Norfolk South Facility will fill the entire 4.9-mile gap in Norfolk and a 0.3-mile portion of the gap in Goshen.

The existing gaps in Cellco service along Route 263 consists of approximately 0.4 miles in Goshen and approximately 3.0 miles in Winchester. If approved, the Norfolk South Facility will fill a 0.3 mile portion of the gap in Goshen and approximately 2.3 mile portion of the gap in Winchester.

Question No. 23

Referencing Application p. 8, provide a table that lists each of the proposed frequencies and the corresponding proposed service for Routes 272 and 263, and the land area of the proposed coverage footprint in square miles, as represented in the example below.

Street Name	700 MHz coverage in miles		850 MHz coverage in miles		1900 MHz coverage in miles		2100 MHz coverage in miles		3700 MHz coverage in miles	
	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 85 dBm	RSRP - 95 dBm	RSRP - 95 dBm	RSRP - 95 dBm
RTE 53	1.6	2.6	0.3	1.9	0	0.4	0	0.2	0	0
Long Ridge Road	1.2	1.8	0.8	1.5	0	0.3	0	0.1	0	0.3
Simpaug Tpke	0.5	1	0.2	0.5	0	0.1	0	0.05	0.05	0.4
Umpawaug Road	0.5	1.4	0.2	1.3	0	0	0	0	0	0
Overall Coverage Footprint (Square Miles)	3.7 Sq Miles	9.2 Sq Miles	1.9 Sq Miles	5.6 Sq Miles	0.1 Sq Miles	1.2 Sq Miles	0.04 Sq Miles	0.9 Sq Miles	0.18 Sq Miles	0.75 Sq Miles

Response

Street Name	700MHz		850MHz		1900MHz		2100MHz		3700MHz	
	RSRP – 85 dBm	RSRP – 95 dBm	RSRP – 85 dBm	RSRP – 95 dBm	RSRP – 85 dBm	RSRP – 95 dBm	RSRP – 85 dBm	RSRP – 95 dBm	RSRP – 85 dBm	RSRP – 95 dBm
Rt. 272	3.5	5.5	3.15	4.95	0.6	1	0.5	0.9	3.1	3.3
Rt. 263	1	2.6	0.9	2.34	0	0.3	0	0.2	0.2	0.4
Overall Coverage Footprint (Square Miles)	21.6	46.6	19.4	41.9	5.1	22.1	2.9	13.6	14	34.5

Emergency Backup Power

Question No. 24

What would be the runtime for Cellco's proposed propane generator before it would need to be refueled, assuming it is running at full load under normal conditions?

Response

The runtime for Cellco's proposed 50-kW propane-fueled generator is approximately 112 hours based on full load (100%) conditions.

Question No. 25

Referring to Application p. 9, how long would the proposed back up battery system provide power to Cellco's equipment if the backup generator failed to start?

Response

The backup battery system is designed to keep the proposed tower site operating for up to eight (8) hours if the generator fails to start.

Question No. 26

Referring to Application p. 21, what is the frequency and duration the proposed backup generator would run periodically for maintenance purposes? Would this be scheduled for daytime hours?

Response

Standard operating procedures requires the generator to be exercised once every two weeks, for approximately 20 minutes, during daytime hours. Specific times when the generator would be exercised could be arranged if the proposed tower site is approved.

Question No. 27

Referencing Application Attachment 1, Site Plan D-3 and Attachment 7- Generator Specifications, what type of generator enclosure, Weather or Sound, is specified for the site?

Response

Cellco plans to install a steel weather enclosure on the generator.

Question No. 28

Could the proposed generator be shared by other carriers that may locate at the proposed facility? What effect would a shared generator have on the run time of the generator if at full load?

Response

No. The 50-kW propane-fueled generator would not be large enough to be shared by other carriers in addition to Cellco. The 50-kW generator is designed to accommodate Cellco's backup power needs only. Although difficult without knowing precisely what an additional carrier or carriers might need for backup power, it is certainly conceivable that an appropriately sized generator could be shared by multiple carriers at the proposed tower site. A larger generator (100-kW or larger) would, very likely, require the installation of a larger propane fuel tank, which would impact run times and refueling requirements. Without those details it is difficult to answer this question with any specificity

Public Health and Safety

Question No. 29

Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility. What structural design codes apply to the tower and antenna mounts?

Response

See response to Question No. 12.

Question No. 30

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

Response

The proposed tower site compound will be surrounded by an eight (8) foot tall chain link security fence and gate. The gate will be locked with access limited to the wireless carriers sharing the proposed tower site. Cellco's wireless equipment will maintain separate silent intrusion alarms, which are monitored remotely. Step bolts and safety climb will begin approximately ten (10) feet above ground level as an anti-climb deterrent.

Question No. 31

Referencing Application p. 6, would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?

Response

Yes, the proposed Facility will support text to-911-service. No additional wireless equipment is required to provide this service.

Question No. 32

Would Cellco's installation comply with the intent of the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 33

Is the proposed facility located within a Department of Energy and Environmental Protection designated Aquifer Protection Area or within a public water supply watershed area? If yes, what measures would be taken to ensure there would be no impact to these resources?

Response

Neither the proposed facility nor the subject property are located within an Aquifer Protection Area (APA) or public water supply watershed (PWS). The nearest APA is located approximately 7.3 miles to the south and is associated with the Aquarion Water Company – Litchfield System (APA ID CT0740011) in Goshen. The nearest PWS is located approximately 0.25 mile south of the proposed facility associated with the Torrington Water Company (PWS ID CT1430011) in Norfolk. The proposed facility is located in a separate local watershed that flows to the north away from the Torrington Water Company PWS. Therefore, the proposed facility would not impact APA or PWS resources.

Question No. 34

Besides the backup power source, what other facility equipment generates noise? Would the noise from this equipment (non-backup power sources) comply with state noise control standards at the property boundaries?

Response

Other than the backup generator, noise from the equipment cabinets will be produced by

the equipment cooling fans. Noise from these cooling fans is minimal and will comply with the State noise standards at the nearest property boundary, approximately 200 feet to the north. According to equipment specifications, noise from the cooling fans on the equipment cabinets produce an average noise level of 67.1 dBA at a distance of 5 feet. Estimating sound levels using the Inverse Square Law confirms that, at a distance of 200 feet, the noise level from the equipment cabinet will be approximately 35 dBA. The DEEP residential noise standards is 55 dBA during the day and 45 dBA during the night.

Question No. 35

How would the site be secured during construction to ensure public safety?

Response

Tarpon would work with its project contractor to secure the premises during construction. Security and safety measures including construction fencing and other barricades would be included to limit and restrict access to all active construction areas. Active construction areas would be secured each night when construction activity is completed for the day. The goal would be to complete all tower and equipment foundation work as quickly as possible to allow for the installation of permanent site security measures as soon as possible.

Question No. 36

Is lighting required at the facility? If so, for what purpose and what type would be installed?

Response

No FAA marking, or lighting of the tower is required. Cellco will install timer-controlled LED lights above the equipment cabinets for use when and if cell site technicians need to be on site at night.

Environmental Effects and Mitigation Measures

Question No. 37

Referencing Application Attachment 9 Visual Assessment,

a) estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower and describe the anticipated views.
b) what is the height range of the tree canopy surrounding the tower site?
c) what are the addresses of the residences shown in photo locations 2, 3, 7 & 8?
d) Is North Pond a public recreational resource?

Response

a) An estimated three (3) residential properties within 0.5-mile of the proposed tower could experience a combination of year-round and seasonal views. Potential year-round views from these locations would generally be in line with those depicted in Photo 3 and Photo 8 of Application Attachment 9. Potential seasonal views on these properties would mainly be obscured by intervening deciduous and evergreen vegetation. Photos 2, 4, 5, and 6 from Application Attachment 9 are representative of the potential seasonal views. Seasonal views (only) may occur at an additional four (4) residential properties. It is anticipated that such views, if any, would be significantly obscured by intervening deciduous and evergreen vegetation.

   To assess which properties within a 0.5-mile radius will experience year-round, seasonal, or a combination of these views, a composite map that overlays parcel boundaries with our viewshed analysis was analyzed. The viewshed model predicts visibility based on terrain, vegetation, and structure height, and includes two visibility layers: year-round (leaf-on conditions) and seasonal (leaf-off

conditions). The extent of visibility on each property was determined by evaluating where and how these visibility layers intersect with individual parcel boundaries. Properties are categorized based on the presence of one or both layers – indicating year-round visibility, seasonal visibility, or both.

b) The tree canopy surrounding the proposed tower ranges from approximately 59 feet above ground level to approximately 95 feet above ground level with an average height of approximately 72 feet above ground level.

c) Photo locations 2 and 3 are in front of 177 Estey Road, Location 7 is in front of 126 Estey Road, and Location 8 is in front of 105 Estey Road.

d) No, North Pond is not a public recreational resource. North Pond is privately owned by the Torrington Water Company. However, recreational activities, such as fishing, are allowed by permit for active Torrington Fish & Game members only. Fishing is only allowed from the shore and requires a valid Connecticut fishing license.

Question No. 38

Referencing Application Attachment 10, what is the status of the DEEP-recommended botanical surveys?

Response

The botanical survey for the three target plant species (Sharp-lobed hepatica, Squirrel corn, and Canada violet) was completed on April 30, 2025. No target plant species were found. The results of the botanical survey were provided to DEEP NDDB, which agreed with the findings and issued a final Determination letter dated July 10, 2025. A copy of the NDDB Determination letter is provided in Exhibit 2 (*NDDB Final Determination Letter*), attached hereto.

Question No. 39

Is the site located within a core forest? If yes, how would development of the site affect core forest values?

Response

Yes, according to the DEEP Forestland Habitat Impact map the proposed facility is located within a large core forest (greater than 500 acres). In proximity to the proposed facility are small perforations (relatively small clearings within the forested landscape) in this core forest associated within nearby residences along with a linear perforation associated with Estey Road. The proposed access road off Estey Road starts adjacent to one of the existing forest perforations associated with the abutting residence to the south that totals approximately 1.25 acres in size. The edge effect from this adjacent residence's perforated forest (330 feet from the edge of clearing) encompasses more than half of the proposed access road to the proposed tower compound. The total area of forest clearing associated with the proposed facility is ±0.87 acres which will slightly increase the existing abutting approximately 1.25-acre residential perforation.

From a landscape perspective, looking at the entirety of the large core forest within which the proposed facility will be located, the proposed development would reduce the overall contiguous forest block by no more than approximately 0.1% of the total forest block. The proposed facility's location adjacent to an existing core forest perforation lessens its impact on this core forest habitat as it will not bisect or otherwise separate major segments of the large core forest block. Thus, the proposed facility represents a de minimis habitat reduction to core forest habitat and the project is not anticipated to adversely impact core forest values.

Question No. 40

What is the acreage of the limit of disturbance required to construct the site?

Response

Approximately 0.92 acres.

Question No. 41

Referencing Application Attachment 18, the host parcel is located at the intersection of two stone walls. Would Applicants maintain any existing stone walls or modify and/or remove any portions of the stone walls for construction of the site?

Response

The description of two stone walls in Application Attachment 18 (more specifically Exhibit "A" to Land Lease Agreement) references the southeastern corner of the host parcel, which is more than 2,000 feet from any planned construction activities.

It is not anticipated that stone walls will be disturbed to construct the proposed compound or access road. However, if any stone walls are encountered, they would be maintained in their current condition or, if necessary, temporarily disassembled and then returned to their original location as close as possible to their original or an improved state after construction.

Question No. 42

Is the proposed facility located within the Upper Housatonic Valley National Heritage Area? If yes, would the proposed facility adversely impact any heritage area resources?

Response

The proposed facility is located within the Upper Housatonic Valley National Heritage Area (UHVNHA). Comprising nine (9) towns in northwest Connecticut and twenty (20) towns in Berkshire County, Massachusetts, the UHVNHA was designated by Congress in 2006 in order to heighten the appreciation of the region, preserve its natural and historical resources, and improve the quality of life and economy of the area.

Based on the results of the Visual Assessment Report (Application Attachment 9), the proposed facility would not be visible from, and therefore have no impact on, any of the nearby scenic resources specifically identified on the Heritage Area Map (UHVNHAmap.pdf). Neither North Pond nor Goshen are part of the UHVNHA. Further, as discussed in the response to Question 37 above, recreational activities at privately-owned North Pond are restricted to permit-only access and the views of the proposed facility depicted in the Visual Assessment Report are primarily from areas on the open water body. There are more than twenty-three (23) communication towers in the nine (9) Connecticut municipalities within the UHVNHA; including emergency service providers, radio and television broadcasts, private dispatch, and wireless telecommunications; with three (3) of those communication towers located in the Town of Norfolk.

Question No. 43

Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

a. wetlands, watercourses and vernal pools;
b. forest/forest edge areas;
c. agricultural soil areas;
d. sloping terrain;
e. proposed stormwater control features;
f. nearest residences;
g. Site access and interior access road(s);

h. tower location/compound;
i. clearing limits/property lines;
j. mitigation areas; and
k. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

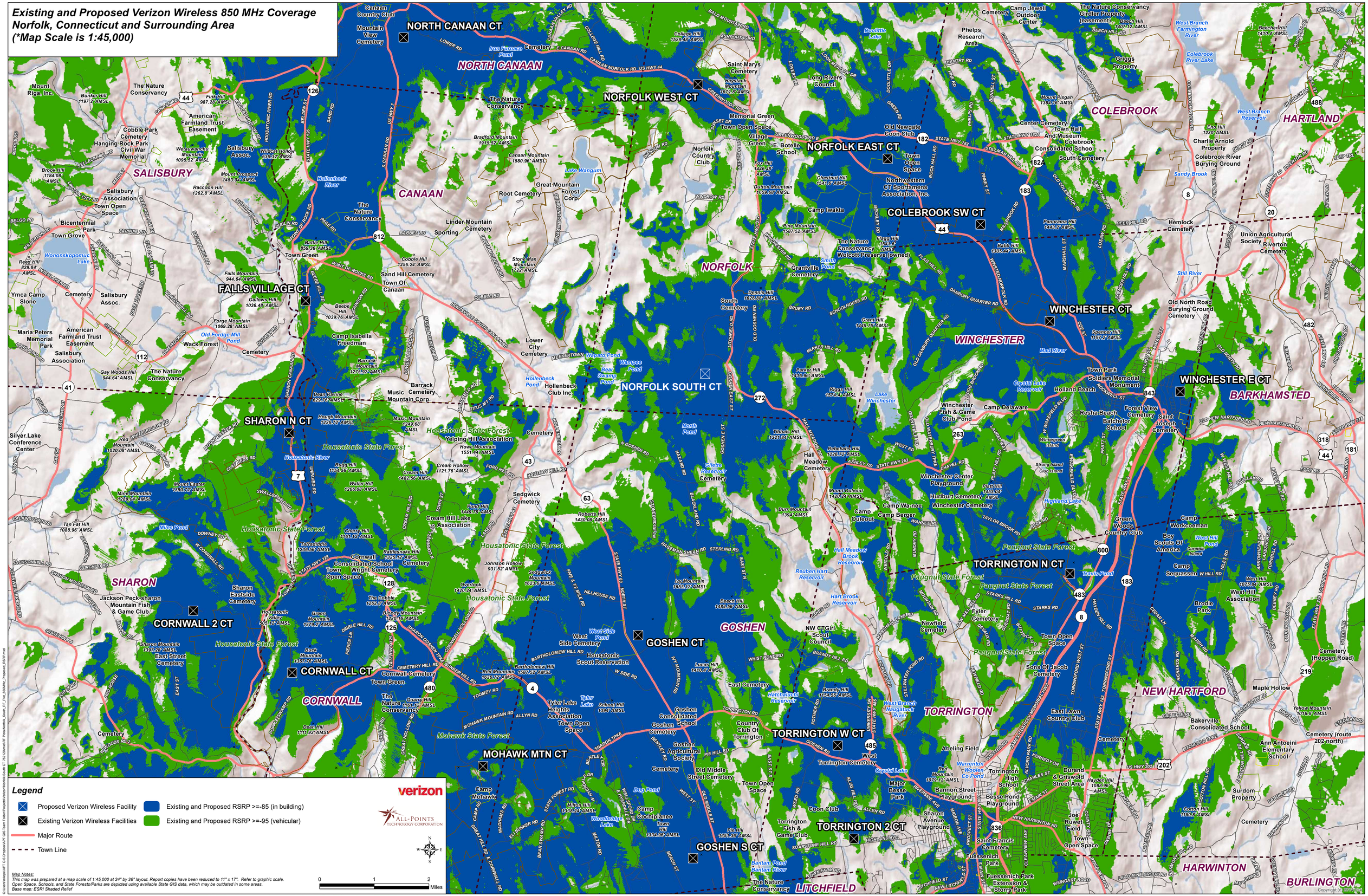
Response

See Exhibit 3 (*Remote Field View*), attached hereto.

EXHIBIT 1

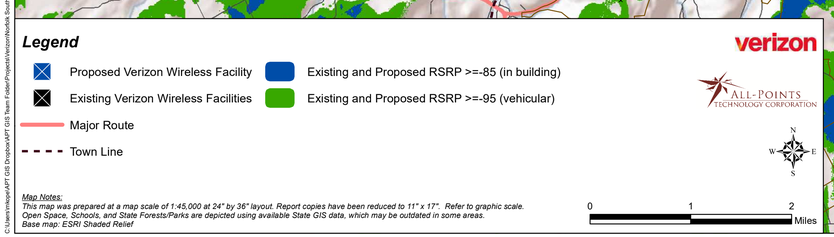
Existing and Proposed Verizon Wireless 700 MHz Coverage Norfolk, Connecticut and Surrounding Area (*Map Scale is 1:45,000)

Existing and Proposed Verizon Wireless 850 MHz Coverage
Norfolk, Connecticut and Surrounding Area
(*Map Scale is 1:45,000)



Existing and Proposed Verizon Wireless 1900 MHz Coverage
Norfolk, Connecticut and Surrounding Area
(*Map Scale is 1:45,000)

NORTH CANAAN CT
NORTH CANAAN
NORFOLK WEST CT
NORFOLK EAST CT
COLEBROOK
HARTLAND
SALISBURY
CANAAN
COLEBROOK SW CT
FALLS VILLAGE CT
NORFOLK
WINCHESTER CT
WINCHESTER
NORFOLK SOUTH CT
WINCHESTER E CT
BARKHAMSTED
SHARON N CT
Housatonic State Forest
Paugnut State Forest
TORRINGTON N CT
SHARON
CORNWALL 2 CT
GOSHEN
GOSHEN CT
CORNWALL CT
CORNWALL
NEW HARTFORD
TORRINGTON
MOHAWK MTN CT
Mohawk State Forest
TORRINGTON W CT
TORRINGTON 2 CT
GOSHEN S CT
HARWINTON
LITCHFIELD
BURLINGTON



Map Notes:
This map was prepared at a map scale of 1:45,000 at 24" by 36" layout. Report copies have been reduced to 11" x 17". Refer to graphic scale.
Open Space, Schools, and State Forests/Parks are depicted using available State GIS data, which may be outdated in some areas.
Base map: ESRI Shaded Relief

Existing and Proposed Verizon Wireless 2100 MHz Coverage
Norfolk, Connecticut and Surrounding Area
(*Map Scale is 1:45,000)

Existing and Proposed Verizon Wireless 5G Coverage
Norfolk, Connecticut and Surrounding Area
(*Map Scale is 1:45,000)

EXHIBIT 2

Connecticut
Department of Energy &
Environmental Protection

portal.ct.gov/DEEP

7/10/2025

Dean Gustafson
TARPON TOWERS II, LLC
1001 3rd Ave W
Bradenton, FL 34205
dgustafson@allpointstech.com

Subject: Norfolk South CT Chapinsky
Filing #: 125494
NDDB - New Determination Number: 202501632

Expiration Date: 7/10/2027

Location Description: 78 Goshen East Street, Norfolk, CT

Dear Brett Buggeln,

Thank you for the recent submittal of the June, 2025 botanical survey report and bat protection plan, for the Norfolk South CT Chapinsky Wireless Telecommunicatin Facility Project.

Based on the findings in the botanical survey report, conducted by botanist Aubree Keurajian (on behalf of Davison Environmental), NDDB has determined that there is no conflict with regards to any of the following State-listed plant species (RCSA Sec.26-306): Sharp-lobed hepatica (*Anemone acutiloba*), Squirrel corn (*Dicentra canadensis*), and Canada violet *(Viola canadensis*), as it relates to the footprint of your proposed project.

It is understood that you will be properly implementing your bat protection program, which includes contractor education, time of year restrictions, and reporting, as outlined within the attached document, provided by Dean Gustafson of All Points Technology Corporation, entitled *Environmental Notes - Resources Protection Measures: Bat Protection Program.*

Your submission information indicates that your project requires a state permit, license, registration, or authorization, or utilizes state funding or involves state agency action. This NDDB - New determination may be utilized to fulfill the Endangered and Threatened Species requirements for state-issued permit applications, licenses, registration submissions, and authorizations.

Please be aware of the following limitations and conditions:

Natural Diversity Database information includes all information regarding listed species available to us at the

time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, land owners, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as enhance existing data. Such new information is incorporated into the Database and accessed through the ezFile portal as it becomes available. New information may result in additional review, and new or modified restrictions or conditions may be necessary to remain in compliance with certain state permits.

- During your work listed species may be encountered on site. A report must be submitted by the observer to the Natural Diversity Database promptly and additional review and restrictions or conditions may be necessary to remain in compliance with certain state permits. Please fill out the appropriate survey form and follow the instructions for submittal.
- Your project involves the state permit application process or other state involvement, including state funding or state agency actions; please note that consultations with your permit analyst or the agency may result in additional requirements. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division may be necessary and additional information, including but not limited to species-specific site surveys, may be required. Any additional review may result in specific restrictions or conditions relating to listed species that may be found at or in the vicinity of the site.
- If your project involves preparing an Environmental Impact Assessment, this NDDB consultation and determination should not be substituted for biological field surveys assessing on-site habitat and species presence.
- The NDDB - New determination for the Norfolk South CT Chapinsky as described in the submitted information and summarized at the end of this document is valid until 7/10/2027. This determination applies only to the project as described in the submission and summarized at the end of this letter. Please re-submit an updated Request for Review if the project's scope of work and/or timeframe changes, including if work has not begun by 7/10/2027.

If you have further questions, please contact me at the following:

Vincent Long
CT DEEP Bureau of Natural Resources
Wildlife Division
Natural Diversity Database
79 Elm Street
Hartford, CT 06106-5127
(860) 502-9786
Vincent.Long@ct.gov

Please reference the Determination Number 202501632 when you e-mail or write. Thank you for consulting the Natural Diversity Data Base.

Vincent Long
Wildlife Division- Natural Diversity Data Base
79 Elm Street
Hartford, CT 06106-5127
(860) 502-9786
Vincent.Long@ct.gov

Application Details:

Project involves federal funds or federal permit:	No
Project involves state funds, state agency action, or relates to CEPA request:	No
Project requires state permit, license, registration, or authorization:	Yes
DEEP enforcement action related to project:	
Project Type:	
Project Sub-type:	New Facility
Project Name:	Norfolk South CT Chapinsky
Project Description:	

ENVIRONMENTAL NOTES - RESOURCES PROTECTION MEASURES

BAT PROTECTION PROGRAM

The proposed facility is located within sensitive habitat known to be used by northern long-eared bat ("NLEB"; *Myotis septentrionalis*), a Federally- and State-listed Endangered Species, tricolored bat ("TCB"; *Perimyotis subflavus*), a Federally Proposed Endangered and State Endangered Species and red bat (Lasiurus borealis), a State Special Concern Species. In order to protect these bat species and prevent incidental take, protection measures are proposed during construction and operation of the facility.

It is of the utmost importance that the Contractor complies with the requirement for implementation of these protective measures and the education of its employees and subcontractors performing work on the project site.

All-Points Technology Corporation, P.C. ("APT") will serve as the Environmental Monitor for this project to ensure that these protection measures are implemented properly. APT will provide an education session for the Contractor prior to the start of construction activities on the potential presence of NLEB and TCB. The Contractor shall contact Dean Gustafson, Senior Biologist at APT, at least 5 business days prior to the start of any construction activities to schedule a pre-construction meeting. Mr. Gustafson can be reached by phone at (860) 552-2033 or via email at dgustafson@allpointstech.com.

This protection program consists of several components: education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; periodic inspection of the construction project; and, reporting. Details of the NLEB, TCB and red bat protection measures to be implemented in association with construction and operation of the facility are provided below.

1. **Contractor Education**

    a. Prior to work on site, the Contractor shall attend an educational session at the pre-construction meeting with APT. This orientation and educational session will consist of an introductory meeting with APT to emphasize the environmentally sensitive nature of the project, the rare species resources, and the requirement to diligently follow the Protective and Conservation Measures as described in sections below.

    b. The Contractor will be provided with cell phone and email contacts for APT personnel to immediately report any encounters with any rare species. Educational poster materials will be provided by APT and displayed on the job site to maintain worker awareness as the project progresses.

    c. If any rare species are encountered, the Contractor shall immediately cease all work, avoid any disturbance to the species, and contact APT.

2. **Bat Habitat - Tree Clearing Restriction**

    a. A time of year restriction ("TOYR") for tree clearing restricts tree removal to occur only between October 1st through April 14th, during the bat's inactive season, when NLEB, TCB and red bat would likely not be present in forested habitat on the subject property. Do not remove trees between April 15th through September 30th.

3. Reporting

a. A Compliance Monitoring Report (brief narrative and applicable photos) documenting APT inspection verifying TOYR for tree removal was adhered to will be submitted by APT to the permittee for compliance verification. Any observations of bats will be included in the reports.

b. Following completion of the construction project, APT will provide a Final Compliance Monitoring Report to the permittee documenting implementation of this NLEB, TCB and red bat protection program and any species observations. The permittee shall provide a copy of the Final Compliance Monitoring Report to the Connecticut Siting Council for compliance verification.

c. Any observations of rare species will be reported to DEEP by APT on the appropriate special animal reporting form, with photo-documentation (if possible) and specific information on the location and disposition of the animal.

EXHIBIT 3

REMOTE FIELD REVIEW

CT SITING COUNCIL DOCKET NO. 536
RESPONSE TO INTERROGATORY #43
NORFOLK SOUTH CT
78 GOSHEN EAST STREET
NORFOLK, CT

PREPARED FOR:

TARPON TOWERS

PREPARED BY:
ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

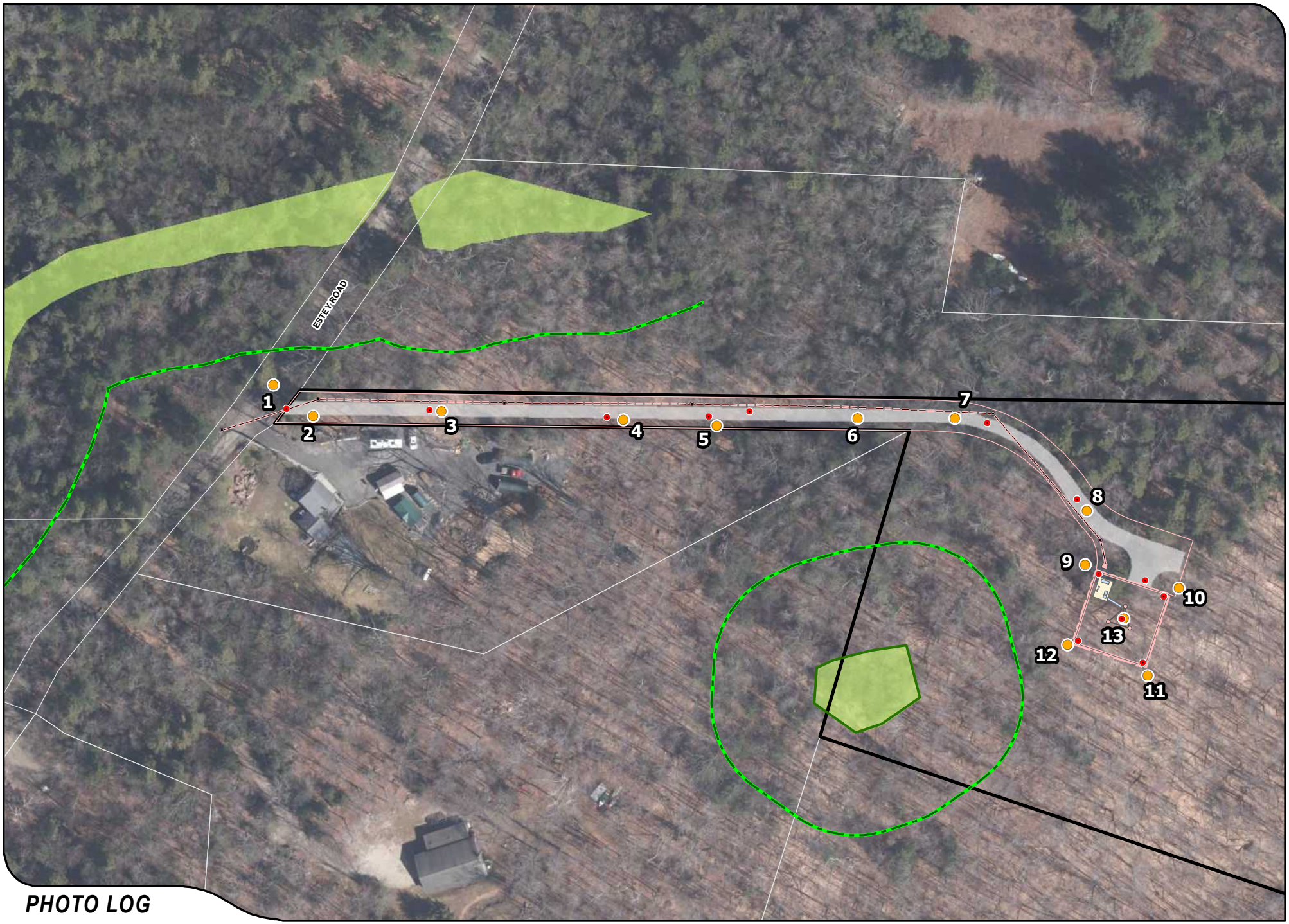


PHOTO LOG

Photo Locations
Photo Markers
Subject Property
Approximate Parcel Boundary
Delineated Wetland Boundary
Delineated Wetland Area
100' Upland Reveiw Area
Existing Utility Pole (By Others)
Proposed Tarpon Utility Pole
Proposed Tarpon Overhead Utilities
Proposed Tarpon Lease Area
Proposed Tarpon Compound
Proposed Tarpon Monopole
Proposed Verizon Equipment
Proposed Verizon Lease Area

N

120 60 0 120 Feet

1 inch = 120 feet

ALL-POINTS TECHNOLOGY CORPORATION

Proposed Wireless
Telecommunications Facility
Norfolk South CT
78 Goshen East Street
Norfolk, Connecticut

PHOTO	DESCRIPTION
1	**PROPOSED ACCESS DRIVE LOOKING SOUTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
2	**PROPOSED ACCESS DRIVE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
3	**PROPOSED ACCESS DRIVE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
4	**PROPOSED ACCESS DRIVE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTOGRAPHED ON 7/15/2025

PHOTO	DESCRIPTION
5	**PROPOSED ACCESS DRIVE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
6	**PROPOSED ACCESS DRIVE LOOKING EAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
7	**PROPOSED ACCESS DRIVE LOOKING SOUTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTOGRAPHED ON 7/15/2025

PHOTO	DESCRIPTION
8	**PROPOSED ACCESS DRIVE LOOKING SOUTHEAST**

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PHOTO	DESCRIPTION
9	**OUTSIDE PROPOSED COMPOUND AREA LOOKING SOUTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

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PHOTO	DESCRIPTION
10	**OUTSIDE PROPOSED COMPOUND AREA LOOKING SOUTHWEST**

PHOTO	DESCRIPTION
11	**OUTSIDE PROPOSED COMPOUND AREA LOOKING NORTH**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTO	DESCRIPTION
12	**OUTSIDE PROPOSED COMPOUND AREA LOOKING NORTHEAST**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS

PHOTOGRAPHED ON 7/15/2025

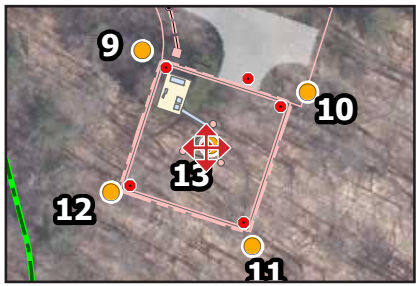

PHOTO	DESCRIPTION
13	**VIEW FROM PROPOSED MONOPOLE - FOUR CARDINAL POINTS**

ALL-POINTS TECHNOLOGY CORPORATION

TARPON TOWERS