

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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APR 29 2009

In Re:

APPLICATION OF SBA TOWERS II, LLC ("SBA") FOR A  
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED FOR THE CONSTRUCTION,  
MAINTENANCE AND OPERATION OF A  
TELECOMMUNICATIONS FACILITY AT ONE OF TWO  
ALTERNATE SITES AT RABBIT HILL ROAD IN  
WARREN, CONNECTICUT

CONNECTICUT  
SITING COUNCIL

DOCKET: 378

April 28, 2009

**CROWW First Set of Interrogatories to Applicant**

**Visual Impact [Application Exhibit L]**

1. Please identify all photographs and provide any additional digital photos relevant to the following statement in the Consultant's Report (Exhibit L):

Site A is visible from a small portion of the Macricostas Preserve and from 3 scenic roads. Site B is visible from 3 scenic roads.

2. Please identify owner's names and addresses for all residences referred to in the following statement in the Consultant's Report (Exhibit L):

Most of the impact for both sites occurs within the surrounding residential neighborhoods. For year round residential impact, Site A will impact one less home on Rabbit Hill Road. The same amount of residences will be impacted on Jack Corner Road. Site B will impact one less residence on Route 202. For seasonal visual impact, the same amount of residences will be impacted on Route 202, Rabbit Hill Road, Jack Corner Road and Wittlesley Road. The differences in residences impacted by either site are minimal and neither site is preferable to the other based on residential impact.

3. Please provide a full-size hard copy of the "2 Mile Viewshed Map," including all descriptive legends.

4. Please provide photographs showing the visual impact of the proposed utility and access easements for Site A and Site B.

**Arable Lands [Application Exhibit M]**

5. What is the land capability class of the specific site location for Site A?

6. What is the land capability class of the specific site location for Site B?

7. What is the land capability class of the proposed additional farmland to replace arable land lost to tower construction?

8. What is the present farm usage of the areas of the property in Land Capability Class 7s and 6s?

9. What percentage of the property is presently used for cow pasture?

10. Will the same percentage of the property continue to be used for cow pasture after the installation of the tower?

11. What effect will the construction and operation of a proposed cell phone tower on either Site A or Site B have on the productivity of the Tanner Farm Property in comparison to the agricultural products produced on the farm during the last calendar year?

12. Please identify (and provide copies of) all scientific studies reviewed by you or your consultants in connection with your response to interrogatories numbers 10 and 11.

**Power Density [Application Exhibit Q]**

13. Please provide cumulative worst-case power density calculations (assuming all channels working simultaneously at full power) and also projected average power density calculations for each frequency range for each provider at each of the following residences and any other residences located within 1500 feet of the proposed Site A and Site B.

**Town of Washington, CT 06777**

Hart, John, 55 Rabbit Hill Road  
Zimmerman, Federico & Amelia Sosa, 50 Rabbit Hill  
Chapin, Jean, 42 Rabbit Hill, 42 Rabbit Hill Road  
Sivick, Michael & Leah, 40 Rabbit Hill

**Town of Warren, CT 06777**

Collins, Ryan & Chadwick, Meredith, 141 Rabbit Hill Road  
Tanner, Lewis and Truda, 131 Rabbit Hill Road  
Coleman, Bruce & Judith, 158 Rabbit Hill Road  
Tanner, Jann & Cal, 85 Jack Corner Road  
Lethbridge, Howard & Loreen, 67 Jack Corner Road  
Niemann, George, 110 Rabbit Hill Road

14. Please identify (and provide copies of) all scientific studies reviewed by you in connection with possible harmful environmental impacts from future tower operations at Sites A and B on:

- wildlife
- domestic animals (including farm animals and pets)
- human beings

15. Please identify (and provide copies of) all scientific studies reviewed by your consultants in connection with possible harmful environmental impacts from future tower operations at Sites A and B on:

- wildlife
- domestic animals (including farm animals and pets)
- human beings

16. Please describe services to be supplied by AT&T at AT&T GSM- 1900 Band; AT&T GSM- 880-894; AT&T UMTS- 880-894.

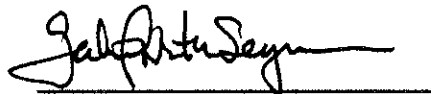
17. Please describe all frequencies and services to be supplied by Verizon from the proposed SBA tower.

18. Please describe all frequencies and services to be supplied by T-Mobile from the proposed SBA tower.

19. Please identify and describe FCC safety standards for each of the foregoing frequencies referred to in interrogatories 16, 17 and 18.

**Public Need**

20. Please provide details of the present networks for At&T, T-Mobile and Verizon describing and showing the exact areas where "gaps" presently exist to be filled by the proposed tower. Please also provide information as to all telecommunications providers who presently supply service in the "gap" areas.



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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, an original and fifteen copies of the foregoing CROWW First Set of Interrogatories to Applicant was served on the Connecticut Siting Council by first class mail and copy of same was sent postage prepaid to:

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P.O. Box 383, Washington Depot, CT 06794

Hon. Jack Travers, First Selectman  
Warren Town Hall, 7 Sackett Hill Road, Warren, CT 06754

Ray and Mary Ellen Furse, 26 Jack Corner Road  
Warren, CT 06777

Hon. F. Philip Prelli, Commissioner, Department of Agriculture  
165 Capitol Avenue, Hartford, CT 06106

Susan Payne, Chairperson, Conservation Commission  
Town of Washington, Bryan Memorial Town Hall  
P. O. Box 383, Washington Depot, CT 06794

Diane Dupuis, Chair, Cell Tower Committee  
Conservation Commission, Bryan Town Hall  
P. O. Box 383, Washington Depot, CT 06794-0383



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Attorney for CROWW

Dated: April 28, 2009