

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE NORTHEAST
LLC, FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 15 ORCHARD PARK ROAD IN THE TOWN
OF MADISON, CONNECTICUT

DOCKET NO. 390

Date: December 22, 2009

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL
FROM APPLICANT T-MOBILE NORTHEAST, LLC**

The Applicant, T-Mobile Northeast, LLC ("T-Mobile"), submits the following responses to the second set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. Would T-Mobile's proposed 100-foot tower be visible from the residences on Johnson Lane, either during the leaf-on or leaf-off season? Would a 120-foot tower be visible from the Johnson Lane residences? A 140-foot tower? Provide photographic simulations from Johnson Lane at these respective heights.
- A1** On December 14, 2009, Vanasse Hangen Brustlin, Inc. ("VHB") performed additional in-field reconnaissance to assess further the potential year-round and seasonal views from residential properties located along Johnson Lane for telecommunications facilities with heights of 100, 120 and 140 feet above grade level ("AGL"). This additional reconnaissance confirmed that a facility at 100 feet AGL would have a minimal visual impact on the residences located at Johnson Lane. A facility at 120 or 140 feet AGL would increase the visibility somewhat for these residences.

Facility at 100 feet AGL. The proposed Facility would not be visible from Johnson Lane during leaf-on conditions. Intermittent seasonal views may be achieved from select portions of Johnson Lane. Two residences west of Fort Path Road may achieve seasonal views of the Facility. Portions of the rear yards of six residences located along the southern section of Johnson Lane may also achieve seasonal views. These six properties are adjacent to the existing Amtrak rail line which is located to the north of the subject property at 15 Orchard Park Road ("Property").

The above observations are consistent with those made in the Visual Resource Evaluation Report submitted with the Application as Exhibit M, except for the two residences located west of Fort Path Road. The reason for this is that the mature coniferous vegetation located between the proposed Facility and these two residences, and viewed initially in July, 2009, are Larch Trees, which are evergreen trees that lose their needles during the winter. There is also a limited seasonal view of the Facility along Johnson Lane (view 3) which is limited to the roadway itself and not to any residence.

Facility at 120 feet AGL. A facility with a height of 120 feet AGL would be visible year round from select portions of Johnson Lane. These locations are represented in views 1 through 3 and are appended hereto as Attachment A. Seasonal views may be achieved from approximately six residences along Johnson Lane, most of which are located south of the roadway with rear yards that have a line of sight to the proposed Facility. These views would be at or just above the tree canopy.

Facility at 140 feet AGL. A facility with a height of 140 feet AGL would be visible year round from select portions of Johnson Lane. These locations are represented in views 1 through 3 and are appended hereto as Attachment A. Seasonal views may be achieved from approximately eight residences along Johnson Lane, most of which are located south of the roadway with rear yards that have a line of sight to the proposed Facility. These views would extend above the tree canopy and show at least two antenna platforms.

2. What would be the overall visibility of a 120-foot tower? A 140-foot tower? Provide viewshed analysis maps showing the different areas of visibility.

A2 A telecommunications facility proposed at heights of 120 and 140 feet AGL would be visible from approximately 1,091 acres and 1,371 acres, respectively, of the total 8,042 acres contained within the two mile Study Area. The majority of these views at either height would be more than one mile away over open water on the Long Island Sound and/or tidal marsh located to the southwest of the Property. A facility at either of these heights would also be visible year round from select portions of Route 1, Stony Lane, Johnson Lane, Mungertown Road, Fort Path Road and Green Hill Road. There may be some seasonal visibility of a facility at 120 or 140 feet AGL along Route 1, Johnson Lane, Stony Lane, Fort Path Road and Stonewall Lane. These views are depicted on the viewshed maps appended hereto as Attachment A.

3. VHB has performed a coastal consistency analysis as part of T-Mobile's application (included in Exhibit N). Is this analysis the same as DEP's Coastal Consistency Review or does it meet the requirements of this review? Does T-Mobile need to submit VHB's analysis to DEP for its approval/sign off?

A3 The coastal consistency analysis adheres to the DEP's review guidelines in accordance with the Connecticut Coastal Management Act, General Statutes 22a-90 et seq. The DEP does not have to approve VHB's Coastal consistency analysis. VHB does, however, recommend that the a copy of any future application be forwarded to the DEP Office of the Long Island Programs for review and comment at the same time a copy of that application is forwarded to the DEP.

Respectfully submitted,

T-MOBILE NORTHEAST, LLC

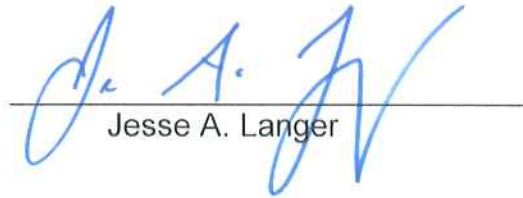
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CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by regular mail, postage prepaid, to all parties and interveners of record, as follows:

N/A


Jesse A. Langer

ATTACHMENT A

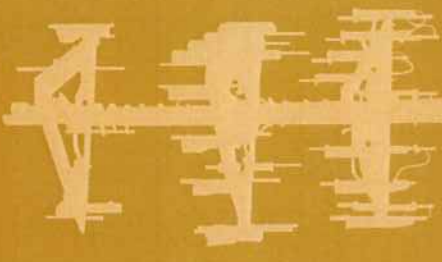
Photographic Simulations

Addendum to Responses to Interrogatories

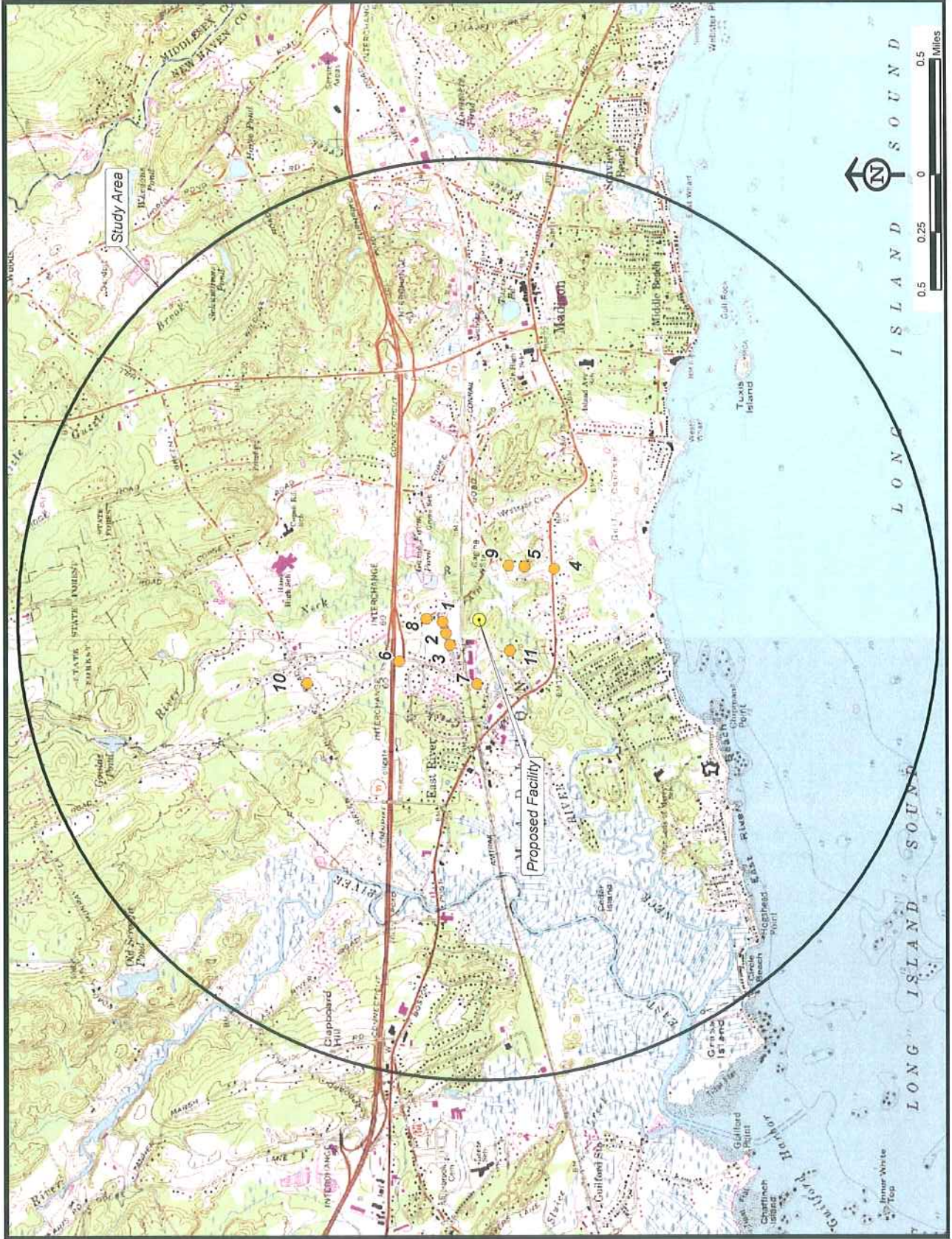


15 Orchard Park Road
Madison, CT
Connecticut Siting Council Docket No. 390

SUBMITTED BY:



PHOTOLOG MAP



100' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	JOHNSON LANE ADJACENT TO HOUSE #52	SOUTH	0.16 MILE +/-	SEASONAL

120' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	JOHNSON LANE ADJACENT TO HOUSE #52	SOUTH	0.16 MILE +/-	SEASONAL

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	JOHNSON LANE ADJACENT TO HOUSE #52	SOUTH	0.16 MILE +/-	YEAR-ROUND

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140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	JOHNSON LANE ADJACENT TO HOUSE #44	SOUTHEAST	0.15 MILE +/-	YEAR-ROUND

100' Tall Monopole

PHOTOGRAPHIC SIMULATION

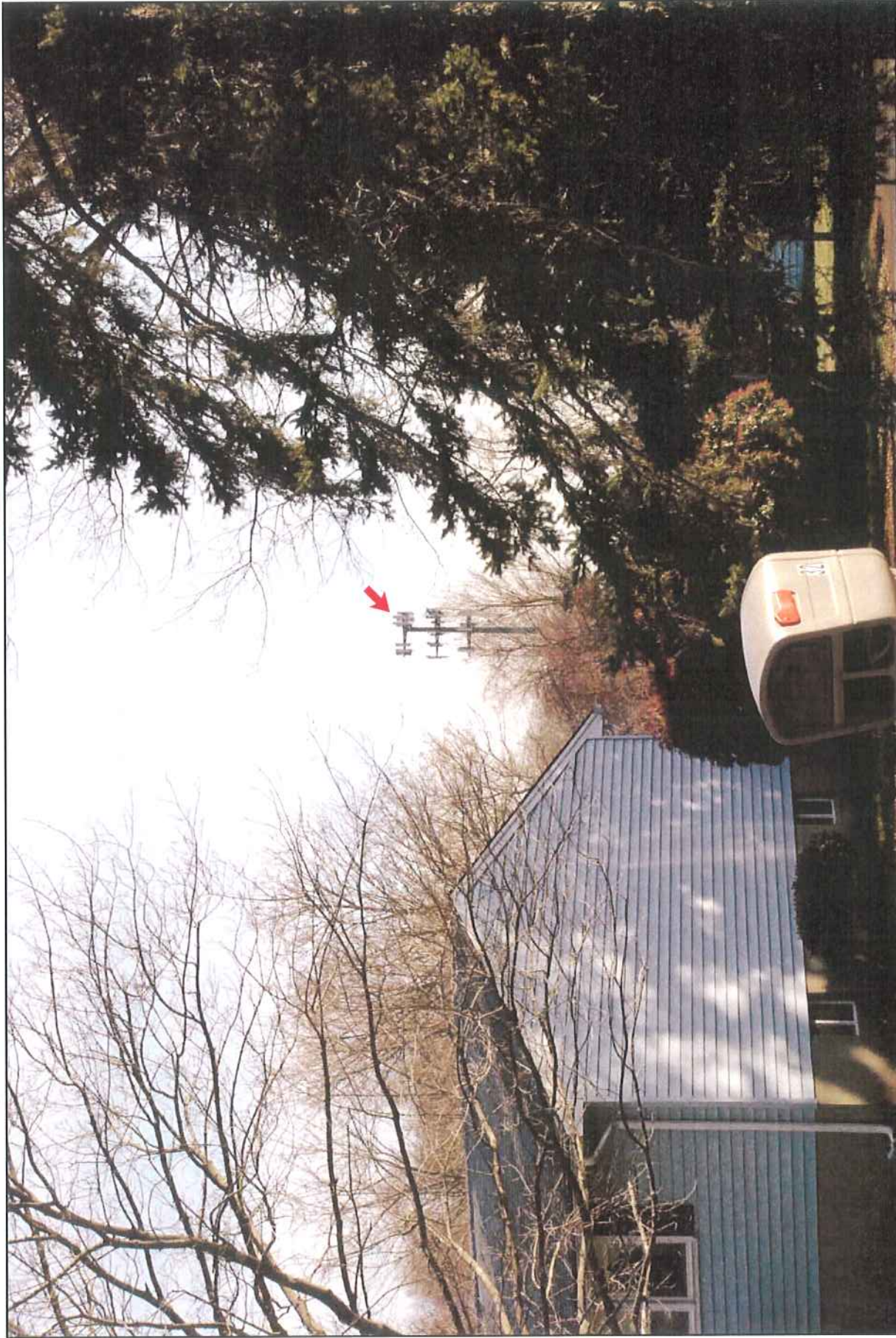


VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	JOHNSON LANE ADJACENT TO HOUSE #32	SOUTHEAST	0.17 MILE +/-	SEASONAL

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120' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	JOHNSON LANE ADJACENT TO HOUSE #32	SOUTHEAST	0.17 MILE +/-	YEAR-ROUND



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140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	JOHNSON LANE ADJACENT TO HOUSE #32	SOUTHEAST	0.17 MILE +/-	YEAR-ROUND

100' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	US ROUTE 1 WEST OF STONY LANE	NORTHWEST	0.39 MILE +/-	YEAR-ROUND

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120' Tall Monopole

PHOTOGRAPHIC SIMULATION

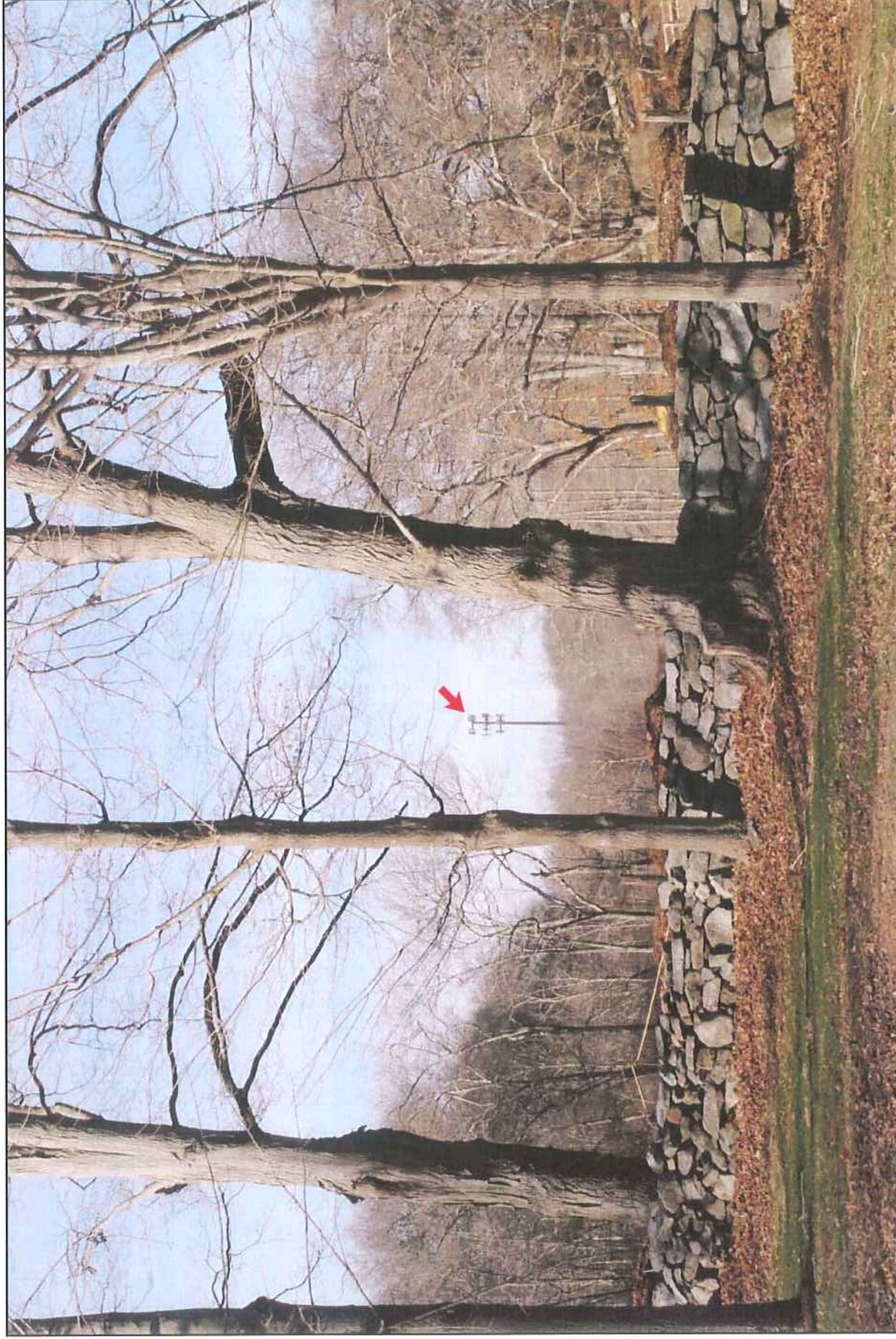


VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	US ROUTE 1 WEST OF STONY LANE	NORTHWEST	0.39 MILE +/-	YEAR-ROUND

FOR BIDDING PURPOSES ONLY. FIGURES ARE TO PROVIDE A GENERAL IDEA OF THE PROJECT.

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	US ROUTE 1 WEST OF STONY LANE	NORTHWEST	0.39 MILE +/-	YEAR-ROUND

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100' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	STONY LANE ADJACENT TO HOUSE #30	NORTHWEST	0.31 MILE +/-	SEASONAL

120' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	STONY LANE ADJACENT TO HOUSE #30	NORTHWEST	0.31 MILE +/-	YEAR-ROUND

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	STONY LANE ADJACENT TO HOUSE #30	NORTHWEST	0.31 MILE +/-	YEAR-ROUND

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	MUNGERTOWN ROAD AT I-95 ON RAMP	SOUTHEAST	0.40 MILE +/-	YEAR-ROUND

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120' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	MUNGERTOWN ROAD AT ORCHARD PARK ROAD	EAST	0.27 MILE +/-	YEAR-ROUND

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	MUNGERTOWN ROAD AT ORCHARD PARK ROAD	EAST	0.27 MILE +/-	YEAR-ROUND

120' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	FORT PATH ROAD ADJACENT TO HOUSE #221	SOUTH	0.23 MILE +/-	SEASONAL

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140' Tall Monopole

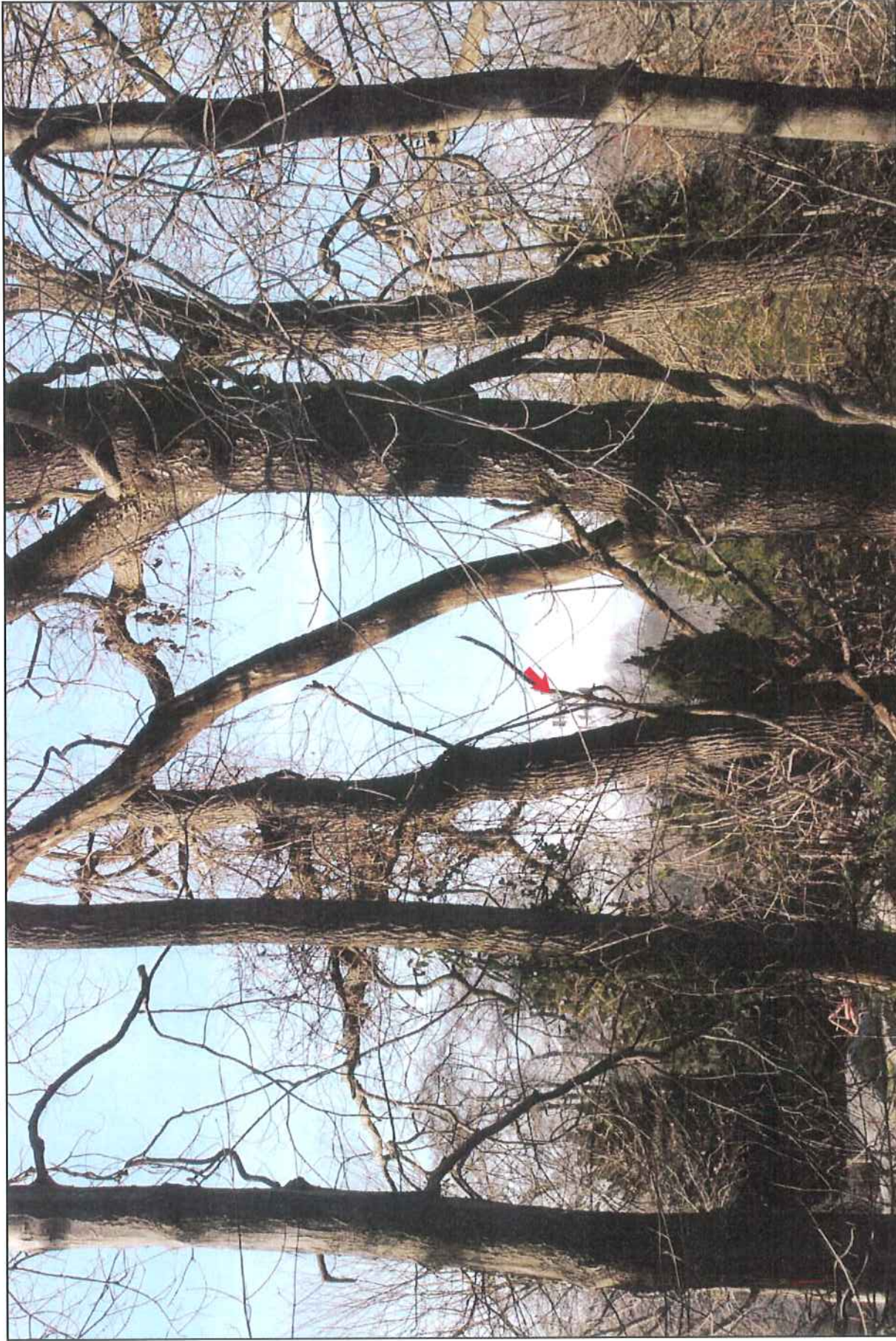
PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	FORT PATH ROAD ADJACENT TO HOUSE #221	SOUTH	0.23 MILE +/-	SEASONAL

120' Tall Monopole

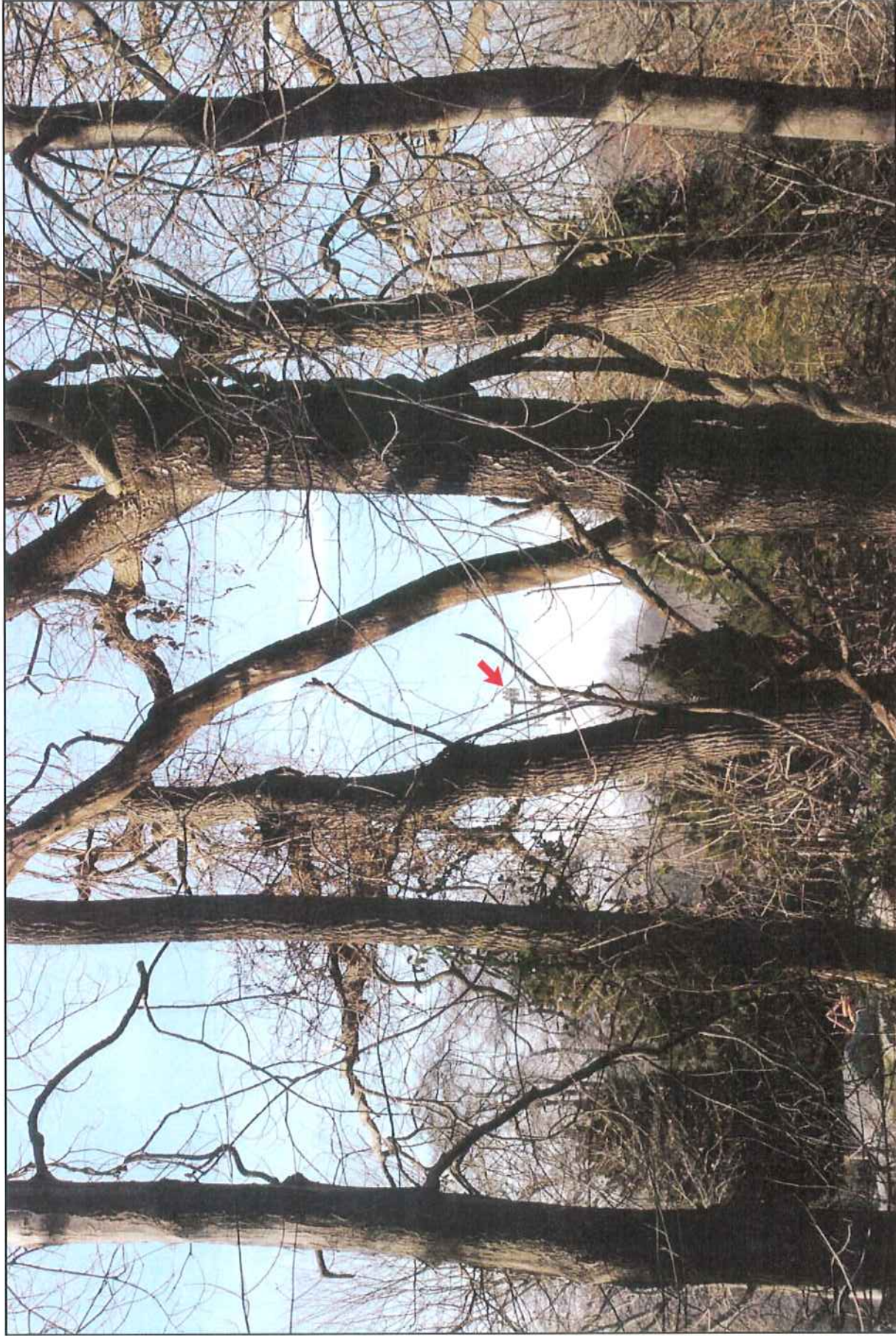
PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	STONY LANE ADJACENT TO HOUSE #36	NORTHWEST	0.24 MILE +/-	SEASONAL

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	STONY LANE ADJACENT TO HOUSE #36	NORTHWEST	0.24 MILE +/-	SEASONAL

140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	GREEN HILL ROAD ADJACENT TO HOUSE #205	SOUTHEAST	0.80 MILE +/-	SEASONAL

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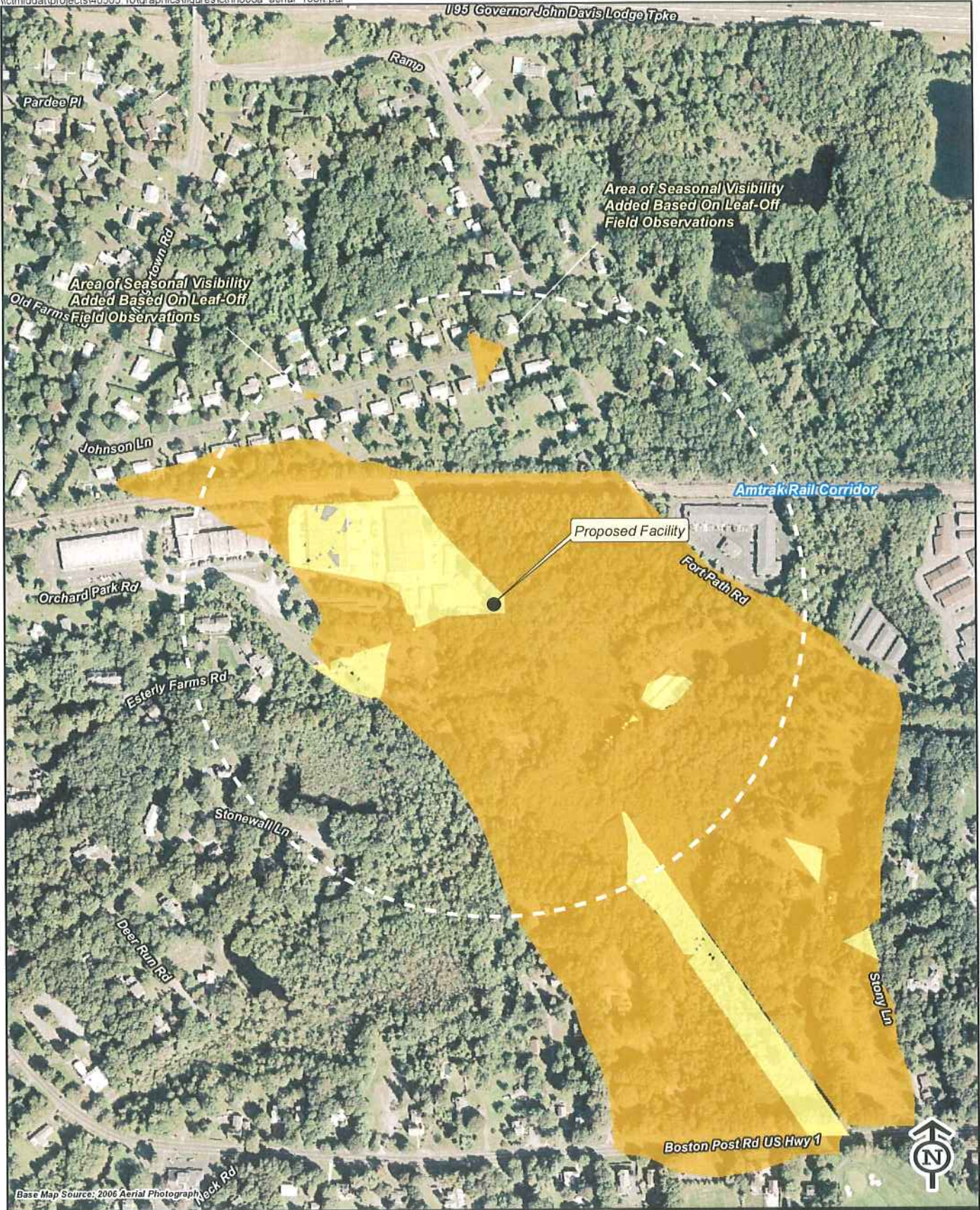
140' Tall Monopole

PHOTOGRAPHIC SIMULATION



VIEW	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
11	STONEWALL LANE	NORTHEAST	0.18 MILE +/-	SEASONAL

U95 Governor John Davis Lodge Tpke



Base Map Source: 2006 Aerial Photograph



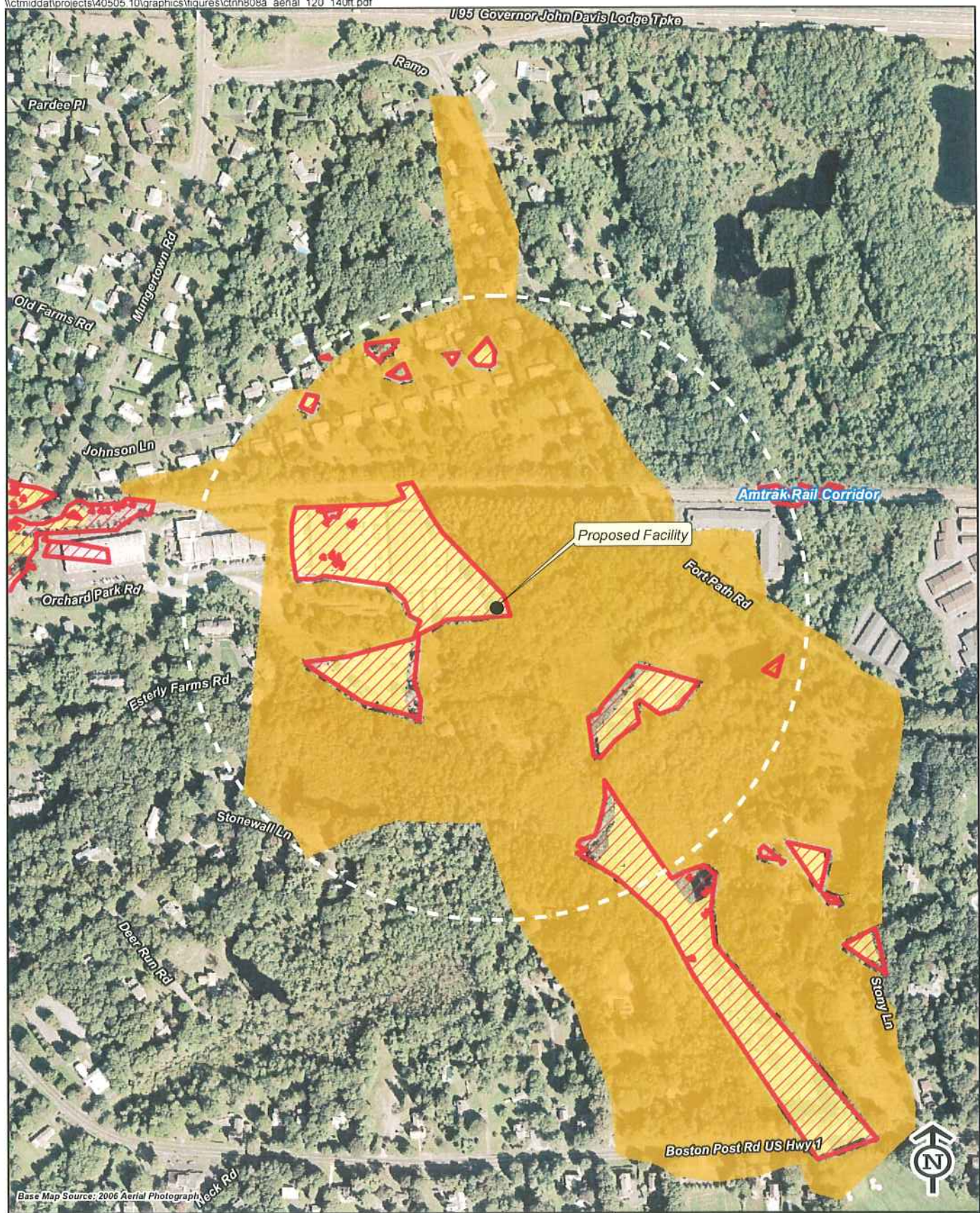
Legend

- Proposed Facility
- Year-Round Visibility At 100 Feet AGL
- Seasonal Visibility At 100 Feet AGL

Vanasse Hangen Brustlin, Inc.

Docket No. 390
 Year-Round and Seasonal Visibility
 Associated With The Proposed (100-Foot Tall)
 T-Mobile Wireless Telecommunications Facility
 From Johnson Lane and Surrounding Area
 15 Orchard Park Road
 Madison, Connecticut

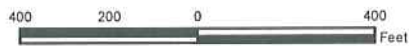




Base Map Source: 2006 Aerial Photograph

Legend

- Proposed Facility
- Year-Round Visibility At 120-Feet AGL
- ▨ Year-Round Visibility At 140-Feet AGL
- Seasonal Visibility At 120 Feet AGL and 140 Feet AGL



Vanasse Hangen Brustlin, Inc.

Docket No. 390
 Year-Round and Seasonal Visibility
 Associated With A 120-Foot Tall and 140-Foot Tall
 Wireless Telecommunications Facility
 From Johnson Lane and Surrounding Area
 15 Orchard Park Road
 Madison, Connecticut



































Docket No. 390
 Responses To Connecticut Siting Council Interrogatories
 Comparative Viewshed Analysis
 Proposed T-Mobile Wireless
 Telecommunications Facility
 CTNH808A
 15 Orchard Park Road
 Madison, Connecticut

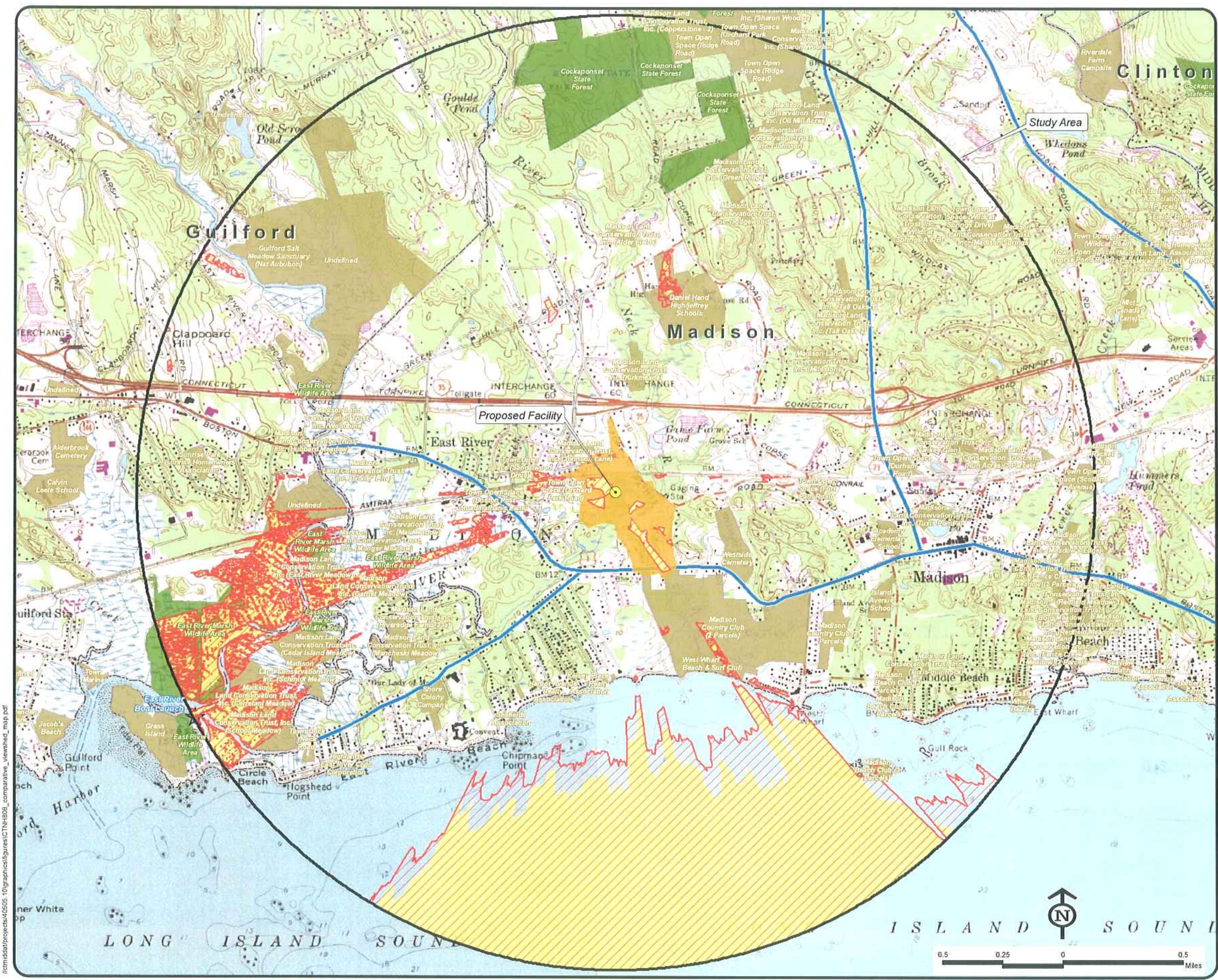
NOTE:
 - Viewshed analysis conducted using ESRI's Spatial Analyst.
 - Heights analyzed are 120 feet AGL and 140 feet AGL.
 - Existing tree canopy height estimated at 60 feet.
 - Study Area is comprised of a two-mile radius surrounding the proposed facility and includes 8,042 acres of land.

DATA SOURCES:
 - Digital elevation model (DEM) derived from Connecticut LiDAR-based Digital Elevation Data (collected in 2000) with a 10-foot spatial resolution produced by the University of Connecticut and the Center for Land Use Education and Research (CLEAR); 2007
 - Forest areas derived from 2006 digital orthophotos with 1-foot pixel resolution; digitized by VHB, 2009
 - Base map comprised of Guilford (1984) and Clinton (1984) USGS Quadrangle Maps
 - Protected municipal and private open space properties and federal protected properties and data layers provided by CT DEP, 1997
 - Protected CT DEP properties data layer provided by CTDEP, May 2007
 - CT DEP boat launches data layer provided by CT DEP, 1994
 - Scenic Roads layer derived from available State and Local listings.

Map Compiled December, 2009

Legend

- | | | | |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|------------------------------------|
|  | Tower Location |  | CT DEP Protected Properties (2007) |
|  | Year-Round Visibility At 120 Feet AGL (Approximately 1,091 acres) |  | State Forest |
|  | Year-Round Visibility At 140 Feet AGL (Approximately 1,371 acres) |  | State Park |
|  | Seasonal Visibility At 120 Feet AGL and 140 Feet AGL (Approximately 76 acres) |  | DEP Owned Waterbody |
|  | Protected Municipal and Private Open Space Properties (1997) |  | State Park Scenic Reserve |
|  | Cemetery |  | Historic Preserve |
|  | Preservation |  | Natural Area Preserve |
|  | Conservation |  | Fish Hatchery |
|  | Existing Preserved Open Space |  | Flood Control |
|  | Recreation |  | Other |
|  | General Recreation |  | State Park Trail |
|  | School |  | Water Access |
|  | Uncategorized |  | Wildlife Area |
|  | CT DEP Boat Launches (1994) |  | Wildlife Sanctuary |
|  | Scenic Road (State and Local) |  | |
|  | Town Line |  | |



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