

October 3, 2011

VIA OVERNIGHT MAIL

Eric McPhee
Supervising Environmental Analyst
Drinking Water Section
Department of Public Health
410 Capitol Avenue
P.O. Box 340308
Hartford, Connecticut 06134
(860) 509-7333

Re: Connecticut Siting Council Docket No. 422
North Atlantic Towers, LLC and New Cingular Wireless PCS, LLC (AT&T)
Application for a Certificate of Environmental Compatibility and Public Need for the
Construction, Maintenance and Operation of a Wireless Telecommunications Facility at
655 Bassett Road, Watertown, Connecticut

Dear Mr. McPhee:

This letter is submitted on behalf of our clients, North Atlantic Towers, LLC and New Cingular Wireless PCS, LLC ("AT&T") and in response to your September 15th comments to the Connecticut Siting Council regarding the above referenced docket. Thank you for providing your recommendations with respect to our clients' proposal and watershed protection.

For your information, I have enclosed a copy of an August 9, 2011 letter that was forwarded to the City of Waterbury Bureau of Water along with a copy of the above referenced Certificate Application. The enclosed letter, prepared by Infinigy Engineering, details the precautions, monitoring and notifications that will be incorporated as part of our clients' proposed telecommunications facility. As you will note, the measures detailed in the enclosed letter include the recommendations outlined in your September 15th letter.

Should you have any questions regarding the enclosed information, please do not hesitate to contact me.

Thank you for your consideration in this matter.

Sincerely,



Lucia Chioecchio

Enclosure

cc: Kimberly Wholean
Donald J. Carver, Acting Superintendent, City of Waterbury Bureau of Water
Connecticut Siting Council
John Stevens, North Atlantic Towers, LLC
Randy Howse, North Atlantic Towers, LLC
John Favreau, Infinigy Engineering

CUDDY & FEDER^{LLP}

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August 10, 2011

VIA OVERNIGHT MAIL

Don Carver
Acting Superintendent
City of Waterbury
Bureau of Water
21 East Aurora Street
Waterbury, CT 06708
(203) 574-8250

Re: North Atlantic Towers, LLC and New Cingular Wireless PCS, LLC (AT&T)
Application to the Connecticut Siting Council for a
Certificate of Environmental Compatibility and Public Need for the
construction, maintenance and operation of a telecommunications facility at
655 Bassett Road, Watertown, Connecticut
Connecticut Siting Council Docket No. 422

Dear Mr. Carver:

This letter and enclosures are being sent on behalf of our clients, North Atlantic Towers, LLC and New Cingular Wireless PCS, LLC (AT&T) in connection with its above-referenced Application to the Connecticut Siting Council for a new wireless telecommunications facility to be located at 655 Bassett Road in the Town of Watertown (the "site"). As you may know from our July 29, 2011 correspondence to you noticing the intent to file the above-referenced Application, the site is owned by the Frank E. Gustafson Revocable Trust, the Edward Gustafson Revocable Trust, Frank E. Gustafson, Jr. Trustee, and Thomas W. Calkins, Independent Trustee and is located within the Wigwam Reservoir watershed.

Enclosed for your information is a copy of North Atlantic Towers' and AT&T's Certificate Application filed with the Siting Council as well as a letter memorandum August 9, 2011, prepared by Infinigy Engineering which details the required precautions, monitoring and notifications for projects that are located within the watershed. The proposed Facility will incorporate these requirements.

Should you have any questions regarding this information, do not hesitate to contact me.

Sincerely,



Lucia Chiochio

Enclosures

cc: John Stevens, North Atlantic Towers, LLC
Randy Howse, North Atlantic Towers, LLC
John Favreau, Infinigy Engineering

August 9, 2011

Mr. Dan Shriver
North Atlantic Towers
1001 3rd Avenue West, Suite 420
Bradenton, FL 34205

Subject: Wigwam Reservoir Watershed Protection Measures
655 Bassett Road, Watertown, CT
Infinigy # 226-015/ CT1140

Dear Mr. Shriver:

The proposed North Atlantic Towers (NAT) telecommunication facility, located at 655 Bassett Road in Watertown, Connecticut lies within the Wigwam Reservoir watershed (Appendix A – Topographic Map). The Wigwam Reservoir, owned and operated by the City of Waterbury, was constructed in 1893 on the Branch Brook and is still utilized today for drinking water. Any construction project located within the Wigwam Reservoir watershed must adhere to strict precautions, monitoring and notifications to protect this important resource. Infinigy Engineering PLLC (**Infinigy**) presents the following watershed protection measures that should be incorporated into the final construction plans. If and when NAT's proposed facility receives approval from the Connecticut Siting Council (CSC), these protection measures could be included in the CSC's Development and Management process.

Erosion and Sedimentation Controls

The construction of the proposed NAT facility will follow an approved soil erosion and sedimentation control plan designed in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*. The installed erosion devices will be inspected once every seven days and after significant rainfall events of greater than one half inch to ensure that proper precautions are taken to avoid the release of sediment into nearby resource areas. These inspections will be documented on an Erosion and Sedimentation Control Site Inspection Form (Appendix B). In addition to the site contractor being responsible for the proper installation and daily inspection of erosion and sedimentation (E&S) controls, staff from **Infinigy** will independently inspect E&S controls and document their condition and recommend any actions necessary to bring the controls back into compliance. This E&S control inspection procedure will help avoid erosion and sedimentation issues by ensuring that the erosion control devices are maintained and functioning properly. Copies of the completed forms will be submitted to the City of Waterbury and CSC throughout the duration of the construction project.

Erosion and sedimentation control items subject to inspection include, but are not limited to the following: construction entrance pad; sediment traps; sediment/detention basins; temporary stockpile areas; silt fencing/hay bales; seeding and mulching; drainage swales; drainage swale check dams; and other site-specific erosion control devices.

Spill Prevention Plan

Certain precautions and procedures are necessary to contain and properly clean up any accidental fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location within a drinking supply watershed. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the site contractor at the construction site throughout the duration of the project. In addition,

a waste drum will be kept on site to contain any used absorbent pads / material for proper disposal off site. The following procedures will be adhered to by the contractor in the event of a petroleum release.

Initial Response

- Stop all operations and power down all equipment.
- Remove any possible ignition sources.
- Contain the source of the spill.
- Determine the approximate volume of the spill.
- Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
- Notify all workers on site of the spill.

Clean Up and Containment

- Obtain spill response materials from the onsite spill response kit.
- Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
- Contact the City of Waterbury Water Department immediately at (203) 574-8251 and all other appropriate local, state and/or federal agencies, as necessary.
- Contact a disposal company to properly dispose of contaminated materials.

Follow Up

- Complete an incident report
- Submit a completed incident report to the City of Waterbury.

The City of Waterbury and Connecticut Siting Council will be notified at least 48 hours in advance of a pre-construction meeting with an invitation to attend. During the project's pre-construction meeting, the contractor will be made aware of the special protective precautions that are required due to the project's location in the Wigwam Reservoir watershed.

Please feel free to contact me with any question or concerns at (518)-690-0790.

Respectfully Submitted,

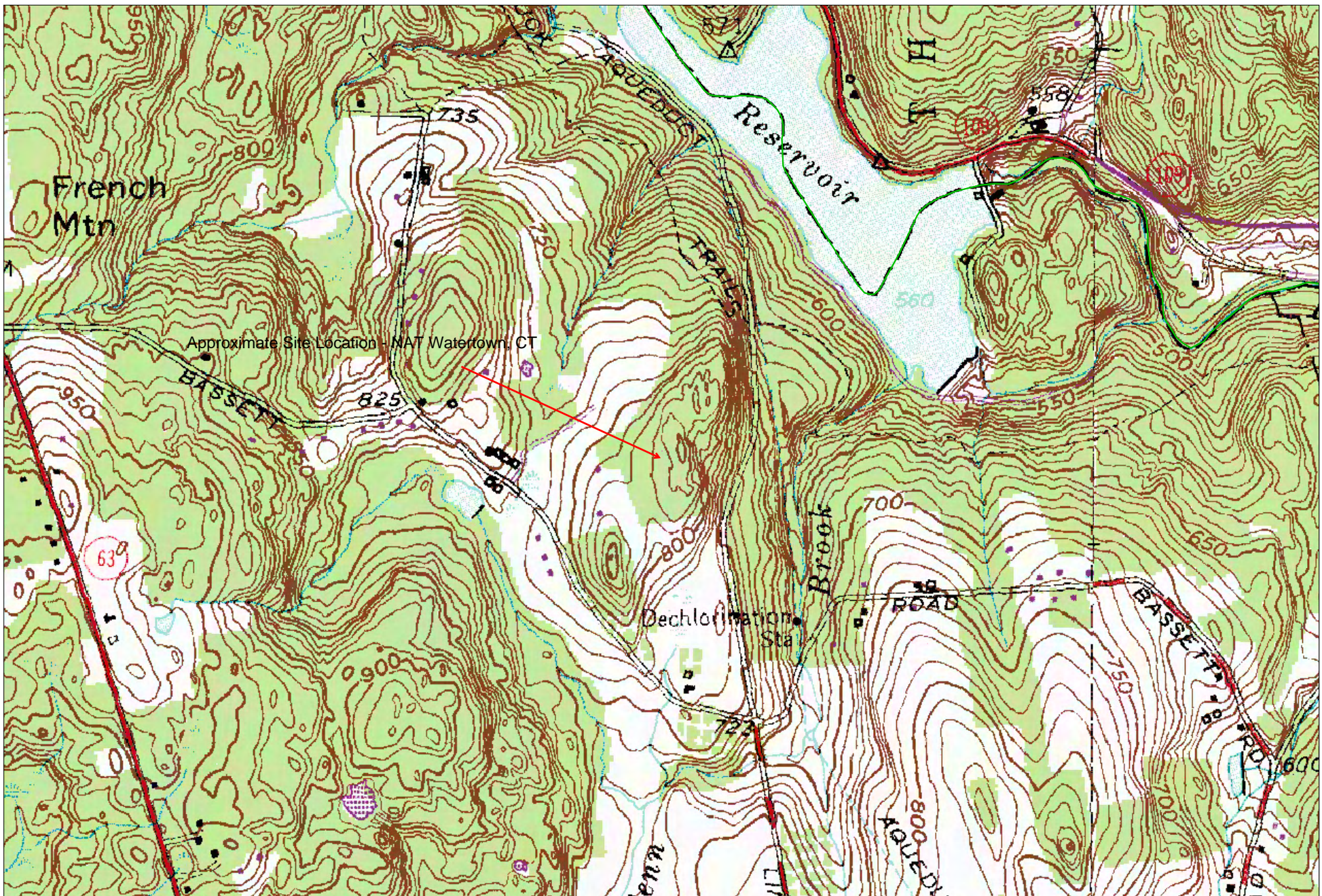
Infinigy Engineering, PLLC


John L. Favreau, CHMM
Director of Environmental Services

Appendix A – Topographic Map
Appendix B – Stormwater Inspection Checklist

APPENDIX A

TOPOGRAPHIC MAP



Map and Geographic Information Center
Homer Babbidge Library
University of Connecticut
magic.lib.uconn.edu



MAGIC, Homer Babbidge Library, the University of Connecticut, and associated data providers are not held responsible for the accuracy of the data and images provided. This material is for reference purposes only.

APPENDIX B

STORMWATER INSPECTION CHECKLIST

EPA Construction General Permit: Stormwater Site Inspection Report

General Information			
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Project Name:			
NPDES Tracking No.:		Site Location:	
Date of Inspection:		Start/End Time:	

Inspector's Name(s):	
Inspector's Title(s):	
Contact Information:	
Inspector's Qualifications:	

Describe the present phase of construction activities:	
Identify contractors that are operating on the site:	
Type of Inspection:	
<input type="checkbox"/> Regular <input type="checkbox"/> Pre-storm event <input type="checkbox"/> During storm event <input type="checkbox"/> Post-storm event	

Weather Information

Has there been a storm event since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, provide: Storm Start Date & Time: _____ Storm Duration (hrs): _____ Approximate Amount of Precipitation (in): _____ Source of information: _____
Weather at time of this inspection? <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snowing <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: _____
Have any discharges occurred since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:
Are there any discharges at the time of inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:

Site-specific BMPs

- Number the structural and non-structural BMPs identified in the SWPPP on the site map and list them below (add as many BMPs as necessary).
- Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site.
- Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

ID #	BMP or Activity	Properly Installed?	Maintenance Required?	Corrective Action Needed and Notes
1		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
13		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
14		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
16		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
17		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
18		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
19		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
20		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
21		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
22		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
23		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
24		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
25		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
26		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
27		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
28		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Overall Site Issues

- *General site issues to evaluate and assess during construction site inspections.*

ID #	BMP or Activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
1	Are slopes and disturbed areas not actively worked being properly stabilized?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Are natural resource areas (i.e. streams, wetlands, mature trees, etc.) properly protected by BMPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Are perimeter controls and sediment barriers properly installed (i.e. keyed into ground) and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Are discharge points and receiving waters free of any sediment deposits?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Are storm drain inlets properly protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Is the construction exit preventing sediment from being tracked into streets?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7	Is trash/litter from work areas collected and placed in covered dumpsters?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Are washout facilities (i.e. paint, stucco, concrete, etc...) available, clearly marked, and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Are materials that are potential stormwater contaminants stored inside or under cover?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Are non-stormwater discharges (i.e. wash water, trench dewatering) properly controlled?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	Are contractors implementing corrective action in a timely manner?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
13	(Other)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

OBSERVED NON-COMPLIANCE

Describe any incidents of non-compliance not described above:
Describe entity responsible for correction of the noted non-compliance:
Date of corrective action taken to address non-compliance:
Describe change in SWPPP to prevent recurrence of the noted non-compliance:

INSPECTOR CERTIFICATION STATEMENT

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Print Name and Title: _____

Signature: _____ **Date:** _____

Supervisor Name and Title: _____

Signature: _____ **Date:** _____