

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

In re Application of New Cingular Wireless	:	
PCS, LLC (AT&T) Application for a	:	Docket No. 428
Certificate of Environmental Compatibility and	:	
Public Need for the Construction, Maintenance	:	August 31, 2012
and Operation of a telecommunications tower	:	
facility in Roxbury, Connecticut	:	

Pre-Hearing interrogatories of  
Bronson Mountain Farm Homeowners' Association  
Set One

1. The Application for Certificate of Environmental Compatibility and Public Need (“Application”) provides that “[Certain new] technologies are better suited for specifically defined areas where new coverage is necessary . . . . The Applicant submits that there are no effective technological alternatives to construction of a new cell site facility for providing reliable personal wireless services in this area of Connecticut.” Application at 11. Acknowledging that the listed technologies may be better suited in other contexts, please provide evidence why these technologies are entirely ill-suited for providing the desired coverage.
2. Please describe why T-arms cannot be utilized for the proposed facility at either Candidate A or Candidate B.
3. Has the stream crossing and access drive for which C.N. Builders, the owner of Candidate A, received wetland approval been constructed? See Application at 13.
4. The Application provides that “[t]he proposed location of the Candidate A Facility is an approximately 91 acre undeveloped parcel. The parcel is larger than most other parcels in the area.” Application at 22. The Application also provides that the “closest property

boundary to Candidate A is approximately 132' from the tower." Application at 21. Given the extremely large size of the undeveloped Candidate A parcel, what other locations on the parcel were considered that would have a less significant impact on the residential area to the south and why were they rejected? Please respond with reference to Response A13 to the CSC Pre-Hearing Questions Set One which indicates that 20' lower antenna height (presumably by reason of lower ground elevation or lower tower height) would have no appreciable impact to the coverage on nearby roads.

5. The Application provides that "[a]ccess to the [Candidate A] facility would be provided initially over a planned subdivision access driveway for a distance of approximately 1,300 feet. From there, AT&T proposes a new 12' wide gravel access drive will [sic] extend approximately 210' to the site." Application, Attachment 3, third page. Please provide a copy of the subdivision approval for the Candidate A parcel that is referenced.
6. The Application provides that a total of 122 trees with a diameter of 6" or greater will need to be removed in order to construct the Candidate A access road, compound, and utilities. Application, Attachment 3, Tab A, Letter of CHA ("CHA Letter"). The plans included in Tab A depict approximately 122 shaded trees that must be removed, but the CHA Letter does not include the other trees (non-shaded) that must be removed in order to construct the access drive. Assuming that the access road has not been constructed, and assuming that no subdivision approval has been sought or obtained, and in light of the fact that the wetland approval for the access road was for the purpose of "a possible cell tower site" and not a subdivision; Application, Attachment 5, Letter of Roxbury Wetland Commission; please provide (i) an accurate listing of the number of trees that must be removed in order to construct the entire proposed 1,510' access drive categorized by diameter; (ii) the total amount of cut and fill required to develop the proposed tower site and the proposed 1,510' access drive including the amount of material that must be brought to and from Candidate A; (iii) details regarding the proposed erosion and sedimentation controls that will be utilized during construction of the 1,510' access drive; (iv) the proposed surface of the completed access drive other than the gravel portion directly adjacent to the proposed facility; (v) the average and greatest proposed slope of the 1,510' access drive; (vi) details regarding stormwater management for the 1,510' access drive; (vii) whether the installation of catch basins or other structures to collect stormwater from the access drive will require the removal of additional trees; (viii) details of any proposed snow or ice treatment for the access drive other than plowing.

7. What is the total size and function of the wetland area located approximately 97' from the nearest grading for the proposed facility? How will the functions of this wetland area be protected during and after construction?
8. Provide details of the proposed erosion and sedimentation controls that will be utilized to protect this wetland area.
9. Will the Applicant flag the proposed location of the entirety of the 1,510' access drive in the field for the benefit of the Council, the intervenors, and the public during its public field review prior to the public hearing?
10. Please provide any geotechnical studies regarding the area for the proposed facility and the proposed 1,510' access drive and whether any blasting will be required.
11. What multiple-facility scenarios has the Applicant investigated to provide similar or better coverage, including scenarios that utilize town-owned properties as directed by the Roxbury Zoning Regulations?
12. The Town of Roxbury owns property on Squire Road. Can the Applicant provide the desired coverage from that property assuming a tower height of 170' either on its own or in conjunction with facilities located on other Town-owned properties or on existing structures, such as church steeples?
13. The propagation map depicting the proposed coverage from Candidate A includes a gap in coverage on Route 67 (Southbury Road). How does the Applicant propose to provide coverage to this state arterial road in the future?
14. The Application, Attachment 2, references a "site search area," but this area is not depicted on a map and is not described in any way. Please provide a map of the "site search area."

Respectfully submitted,

Bronson Mountain Farm  
Homeowners Association,  
Intervenors

By: 

John W. Knuff, Esq.  
Hurwitz, Sagarin,  
Slossberg & Knuff, LLC  
147 N. Broad Street  
PO Box 112  
Milford, Connecticut 06460  
(203) 877-8000  
[JKnuff@hssklaw.com](mailto:JKnuff@hssklaw.com)

Certification

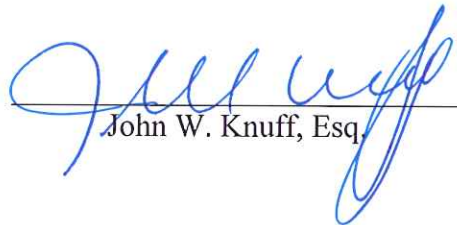
I hereby certify that a copy of the foregoing document was mailed by U.S. mail to the following service list on August 31, 2012:

Attorneys for Applicant, /New Cingular Wireless PCS, LLC:

Daniel M. Laub, Esq.  
Christopher B. Fisher, Esq.  
Cuddy & Feder LLP  
445 Hamilton Avenue, 4<sup>th</sup> Floor  
White Plains, NY 10601  
(914) 761-1300  
(914) 761-5372 fax  
[dlaub@cuddyfeder.com](mailto:dlaub@cuddyfeder.com)  
[cfisher@cuddyfeder.com](mailto:cfisher@cuddyfeder.com)

Michele Briggs  
AT&T  
500 Enterprise Drive  
Rocky Hill, CT 06067-3900  
[Michele.g.briggs@cingular.com](mailto:Michele.g.briggs@cingular.com)

Attorney for Intervenor/Town of Roxbury:  
Barbara Henry, First Selectman  
Town of Roxbury  
29 North Street  
PO Box 203  
Roxbury, CT 06783-0203  
(860) 354-9938  
(860) 354-5060 fax

  
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John W. Knuff, Esq.