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January 5, 2015

***VIA FEDERAL EXPRESS AND
ELECTRONIC MAIL***

Ms. Melanie A. Bachman, Esq., Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06501

Re: Docket No. 454 – Application by Tower Holdings, LLC for A Certificate of Environmental Compatibility and Public Need for A Telecommunications Facility at 199 Brickyard Road, Farmington, Connecticut

Dear Attorney Bachman:

This office represents Tower Holdings, LLC (“Tower Holdings”), the applicant in the above-captioned docket. In accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies and your correspondence, dated December 15, 2014, I have enclosed an original and fifteen (15) copies of Tower Holdings’ responses to the Connecticut Siting Council’s first set of interrogatories directed to Tower Holdings.

If you have any questions concerning the interrogatory responses, please do not hesitate to contact me.

Very truly yours,

Jesse A. Langer

Enclosures

cc: *Service List (via regular mail and electronic mail)*

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

DOCKET NO. 454

**APPLICATION OF TOWER HOLDINGS,
LLC FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE
AND OPERATION OF A
TELECOMMUNICATIONS FACILITY
AT 199 BRICKYARD ROAD IN THE
TOWN OF FARMINGTON,
CONNECTICUT**

January 5, 2015

**INTERROGATORY RESPONSES TO CONNECTICUT SITING
COUNSEL FROM APPLICANT TOWER HOLDINGS, LLC**

The Applicant, Tower Holdings, LLC, ("Tower Holdings"), respectfully submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council ("Council"), dated December 15, 2014, in connection with the above-captioned Application for Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility ("Application") at 199 Brickyard Road, Farmington, Connecticut ("Property").

1. Were return receipts received for each abutting landowner identified in the application? If not, list the abutters that did not receive notice and describe any additional effort to serve notice. When was the abutter list compiled?

Response: Yes. Tower Holdings received confirmation that all abutting property owners identified in Attachment 4 of the Application received notice of Tower Holdings' intent to file the Application with the Council. The list of abutters was first compiled on August 7, 2013, and updated on May 14, 2014.

2. Pursuant to CGS §16-50o, please submit an unredacted copy of the lease for the proposed site. A Motion for Protective Order may accompany this request.

Response: Tower Holdings filed a Motion for Protective Order concerning the lease between it and New Cingular Wireless PCS LLC ("AT&T") on December 15, 2014. The Motion for Protective Order included a copy of the unredacted lease under seal.

3. Would blasting be required to develop the site?

Response: Blasting is not anticipated. Should Tower Holdings encounter bedrock within the confines of the utility trenching or tower foundation construction area, Tower Holdings will implement wedging and mechanical hoe-ram rock removal techniques within reason prior to performing any blasting activities.

4. What security measures would be employed to prevent vandalism and unwanted intrusion into the facility?

Response: The Facility would be enclosed within a fenced and gated compound. The fencing would be eight feet high, containing anti-climb weave fence, and the compound would be accessible by a locked gate. Additionally, AT&T's shelter is locked and remotely monitored for intrusion twenty-four hours a day. Finally, the lot on which the Facility would be located (Lot 3B) is secured by fencing and security cameras.

5. Describe the locations of existing equipment used by WBMW, Dunning and Marcus to provide their existing wireless communication/services. By locating on the proposed site, would these three entities remove their existing equipment from their present locations?

Response: WBMW and Marcus are multi-site users and collocating their respective equipment on the proposed Facility would not result in the removal of their existing equipment from their present locations. WBMW's closest location to the proposed Facility is on Meriden Mountain. Marcus' closest locations to the proposed Facility are on Avon Mountain and at a location in downtown Hartford. Dunning is a single site user, with its equipment located at 103 Brickyard Road. The antenna is located at approximately fifty feet above ground level ("AGL"). Dunning would relocate its equipment to the Facility.

6. Is there a backup power source for WBMW, Dunning and/or Marcus?

Response: Currently, there is no proposed backup power source for WBMW, Dunning and/or Marcus.

7. Is there a tower training structure presently at the 199 Brickyard Road parcel? If so, describe its form and height.

Response: No. The Property does not currently host a tower training structure.

8. Is it possible to construct two separate structures, one for telecommunications use and one for tower training use, on the 199 Brickyard Road parcel?

Response: No. The construction and installation of two facilities is not economically or spatially feasible.

Such a scenario is not economically feasible because of the costs associated with materials and labor for two separate structures.

The Property is not large enough to host two facilities largely because of the ground operations performed by Northeast Towers, Inc. ("NET"). The Property currently hosts an office building and employee parking, as well as designated areas for storage and deliveries in connection with NET's operations. As stated on page 6 of the Application, NET constructs, modifies, reinforces, maintains and decommissions towers of all types, including broadcast towers, telecommunications facilities, rooftop installations, water tank installations, silos, billboards and smokestacks. NET, therefore, stores some of the equipment necessary for that work on site and needs to maintain adequate space to load that equipment onto tractor-trailer trucks and receive deliveries from these large trucks. These trucks require a u-shaped path on the Property from Brickyard Road for ingress and egress.

Additionally, a separate training structure would likely need to have an eighteen by eighteen square foot base to support the necessary height to conduct training, as well as the training equipment, instructors and trainees. Such a facility would also need additional room for adequate fencing, access and "tag" lines associated with training.

A structure with a smaller base would have to be guyed. Under the two structure scenario, the Property could not host a guyed structure because of its relatively limited size, the presence of a second structure for telecommunications, the existing office building and parking area, and NET's existing ground operations.

9. Regarding the Site Search Summary, how did Tower Holdings determine that the 103 Brickyard Road parcel "does not offer any appreciable difference in potential visual impact when compared to the proposed facility? What specific locations were examined on the 103 Brickyard Road parcel and what analyses were performed to determine no appreciable difference in visibility?

Response: Tower Holdings reviewed 103 Brickyard Road ("Parcel") from a general siting perspective, considering areas where a property owner would typically want to locate a telecommunications facility. These areas included the edges of the Parcel; however, Tower Holdings also assessed the entire Parcel and determined that the difference in location would not offer any appreciable difference in the potential visual impact when compared with the proposed Facility.

The Parcel is fairly exposed and more centrally located along Brickyard Road within the commercially developed area, with neighbors on all sides, including a recreation area immediately to its east. In contrast, the Property is located at the northern terminus of development on the road in this area and is bounded by woods to its north and east. The nearest residential development (to the west) to the Parcel is generally of similar distance as that of the Property. Additionally, a commercial child daycare facility is located directly across the street from the Parcel at 3 Eastview Drive.

10. Regarding the Site Search Summary, what is the height of the smokestack at 168 Brickyard Road?

Response: The smokestack is approximately fifty-eight feet AGL.

11. Estimate the number of residential dwellings within a 1,000-foot radius of the proposed site.

Response: There are ten residences located within 1,000 feet of the proposed site.

12. Provide the street address of the residences shown in the Visibility Analysis Photo locations 18, 19, 20, & 21.

Response: The street addresses are as follows:

- **18 = 24 Basswood Road**
- **19 = 10 Tanglewood Road**
- **20 = 15 Maplewood Road**
- **21 = 10 Rosewood Drive**

Respectfully submitted by,

TOWER HOLDINGS, LLC

By: _____

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CERTIFICATION

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

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Jesse A. Langer
Commissioner of the Superior Court