

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY FLORIDA PARTNERS LLC
d/b/a NORTH ATLANTIC TOWERS APPLICATION
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 62-64 CODFISH HILL ROAD IN THE
TOWN OF BETHEL, CONNECTICUT

DOCKET NO. 458

Date: May 19, 2015

**APPLICANT'S INTERROGATORIES TO
THE INTERVENOR CODFISH HILL ENVIRONMENTAL TRUST**

The Applicant, Florida Tower Partners LLC d/b/a North Atlantic Towers, respectfully submits the following interrogatories to the Intervenor, a voluntary association called Codfish Hill Environmental Trust ("CHET"), in connection with the above-captioned docket. North Atlantic Towers requests responses to these interrogatories by May 26, 2015, in accordance with the scheduling order of the Connecticut Siting Council.

INTERROGATORIES

1. Please identify the date CHET was organized as a voluntary association.

2. In the Application to Intervene by CHET, verified April 13, 2015 ("ATI") the CHET membership is characterized as "(t)he members include, but are not limited to . . .". Please identify all members of CHET, including the names and addresses of each member.

3. Please state specifically how the telecommunications facility, proposed by North Atlantic Towers at 62-64 Codfish Hill Road, Bethel, Connecticut ("Facility"), would "have a negative impact on the scenic vistas in Bethel . . ." as alleged at page 1 of the ATI.

4. Please state with specificity which “scenic vistas” the Facility would impact negatively or otherwise.

5. Please state what studies, tests, analyses or reports CHET relied upon to determine that the proposed Facility would “have a negative impact on the scenic vistas in Bethel . . .,” as alleged at page 2 of the ATI.

6. Please state with specificity how the proposed Facility would be “reasonably likely to cause viewshed deterioration...,” as alleged at page 2 of the ATI.

7. Please state with specificity how the proposed Facility would have an “unreasonable impact on the natural resources of the State...,” as alleged at page 1 of the ATI.

8. To the extent not already addressed, please state with specificity how the proposed Facility is reasonably likely to have the effect of unreasonably polluting, impairing, or destroying the public trust in the air, water, or other natural resources of the state.

9. Please identify where CHET proposes to locate the “multiple shorter antennas structures to cover the target area” as indicated in the ATI. If on parcels other than the site proposed in this Docket, has CHET confirmed that those landowners are willing to lease those parcels of property?

10. Please provide specific alternate tower configurations and tower locations as raised in the ATI, including coordinates for such locations and drawings for alternative configurations.

11. Please identify a facility design that CHET believes incorporates the “best available technology” and addresses the specific coverage needs of AT&T and Verizon in this area. Please provide the design in the form of a drawing.


12. Please identify each witness that CHET intends to offer in support of its intervention in Docket 458.

13. For each witness identified in response to Interrogatory 12, please identify the purpose of such witness’ testimony, provide curriculum vitae and any reports or studies the witness relied upon in coming to his or her conclusions.

Respectfully Submitted,

**FLORIDA TOWER PARTNERS LLC
D/B/A NORTH ATLANTIC TOWERS**

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CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and intervenors of record, as follows:

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