

**Vincent M. Marino**

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July 24, 2019

**VIA FEDERAL EXPRESS  
AND ELECTRONIC MAIL**

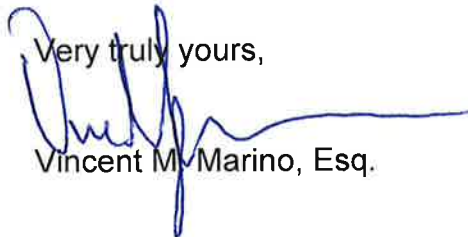
Attorney Melanie Bachman,  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Re: Docket No. 486: Tarpon Towers II, LLC Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility at 796 Woodin Street, Hamden, Connecticut**

Dear Attorney Bachman:

Per your correspondence dated July 17, 2019, on behalf of Tarpon Towers II, LLC, enclosed please an original and twenty (20) copies of the updated Exhibit A which adheres to the Council's current Application Guide.

If you have any questions, please do not hesitate to give me a call.

Very truly yours,  
  
Vincent M. Marino, Esq.

VMM/lcc  
Enclosures

cc: Service List

## EXHIBIT A

Application Guideline	Location in Application
<p>(A) An Executive Summary containing the addresses and proposed locations of the proposed facility and any alternatives, including:</p> <ol style="list-style-type: none"> <li>1. Height of the tower and its associated antennas including a maximum "not to exceed height" for the facility, which may be higher than the height proposed by the Applicant;</li> <li>2. Access roads and utility services;</li> <li>3. Special design features;</li> <li>4. Type, size, and number of transmitters and receivers, as well as the signal frequency and conservative worst-case and estimated operational level approximation of electro magnetic radiofrequency power density levels (facility using FCC Office of Engineering and Technology Bulletin 65, August 1997) at the base of the tower base, site compound boundary where persons are likely to be exposed to maximum power densities from the facility;</li> <li>5. A map showing any fixed facilities with which the proposed facility would interact;</li> <li>6. The coverage signal strength, and integration of the proposed facility with any adjacent fixed facility, to be accompanied by multi-colored propagation maps of red, green and yellow (exact colors may differ depending on computer modeling used, but a legend is required to explain each color used) showing interfaces with any adjacent service areas, including a map scale and north arrows; and</li> <li>7. For cellular systems, a forecast of when maximum capability would be reached for the proposed facility and for facilities that would be integrated with the proposed facility.</li> </ol>	<ul style="list-style-type: none"> <li>• Executive Summary, pages 1-3</li> <li>• IV. Facility Design, pages 6-7</li> <li>• VII.C. MPE Limits/Power Density Analysis, page 21</li> <li>• Exhibit E, Site Plans</li> <li>• Exhibit F, Propagation Plots</li> <li>• Exhibit J, Power Density Calculations</li> </ul>
<p>(B) A statement of the need for the proposed facility with as much specific information as is practicable to demonstrate the need including a</p>	<ul style="list-style-type: none"> <li>• IV.B. Coverage to be Achieved, page 7</li> <li>• IV.A. Statement of Need, pages 8-16</li> </ul>

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description of the proposed system and how the proposed facility would eliminate or alleviate any existing deficiency or limitation;	<ul style="list-style-type: none"> <li>• IV.C. Technological Alternatives, page 16</li> <li>• Exhibit F, Propagation Plots</li> </ul>
(C) A statement of the benefits expected from the proposed facility with as much specific information as is practicable;	<ul style="list-style-type: none"> <li>• IV.B. Coverage to be Achieved, page 7</li> </ul>
(D) Maps and drawings for the proposed facility and any alternatives, including: <ol style="list-style-type: none"> <li>1. The most recent U.S.G.S. topographic quadrangle map (scale 1 inch = 2,000 feet) marked to show the site of the facility and any significant changes within a one mile radius of the site;</li> <li>2. A map (scale not less than 1 inch = 200 feet) of the lot or tract on which the facility is proposed to be located showing the acreage and dimensions of such site, the name and location of adjoining public roads or the nearest public road, and the names and addresses of the site owners and abutting owners and the portions of their lands abutting the site;</li> <li>3. A site plan (scale not less than 1 inch = 40 feet) showing the proposed facility, set back radius, existing and proposed contour elevations, 100 year flood zones, waterways, wetlands, and all associated equipment and structures on the site;</li> <li>4. Where relevant, a terrain profile showing the proposed facility and access road with existing and proposed grades; and</li> <li>5. The most recent aerial photograph (scale not less than 1 inch = 1,000 feet) showing the proposed site, access roads, and all abutting properties.</li> </ol>	<ul style="list-style-type: none"> <li>• USGS Map</li> <li>• Aerial Photograph</li> <li>• IV. Facility Design, pages 6-7</li> <li>• Exhibit E, Site Plans</li> </ul>
(E) A description of the proposed site and any alternative sites, including the zoning classification, planned land uses and surrounding areas;	<ul style="list-style-type: none"> <li>• Executive Summary, pages 1-3</li> <li>• VII. Consistency with the Hamden Land Use Regulations, pages 24-29</li> <li>• VII.C. Planned and Existing Land Uses, page 28</li> </ul>
(F) A description of the scenic, natural, historic, and recreational characteristics of	<ul style="list-style-type: none"> <li>• VI. Environmental Compatibility, pages 18-24</li> </ul>

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the proposed site and any alternative sites and surrounding areas including but not limited to officially designated nearby hiking trails, nature preserves and scenic roads;	<ul style="list-style-type: none"> <li>• Exhibit H, Visual Resource Evaluation Report</li> <li>• Exhibit I, Correspondence with State Agencies</li> <li>• Exhibit K, NEPA Summary Report</li> <li>• Bulk Filing</li> </ul>
<p>(G) Visibility Analyses of the proposed site area and any alternative site areas including, but not limited to:</p> <ol style="list-style-type: none"> <li>1. A viewshed analysis consisting of a two-mile radius from visually impacted areas such as residential developments, recreational areas, and historic sites;</li> <li>2. Photographic documentation;</li> <li>3. Balloon float photographs;</li> <li>4. Photographic simulations in "leaf-on" and "leaf-off" conditions, where possible, and;</li> <li>5. If proposed in close proximity to a shoreline, including lakes and rivers, photographic documentation from open waters, where possible.</li> </ol>	<ul style="list-style-type: none"> <li>• Exhibit H, Visual Assessment Report.</li> </ul>
(H) An affidavit for each balloon float conducted at the proposed site and any alternative sites including the date, time and demonstrated height.	<ul style="list-style-type: none"> <li>• Exhibit H, Visual Assessment Report</li> </ul>
(I) A list describing the type and height of all existing and proposed towers and facilities within a four mile radius within the site search area, or within any other area from which use of the proposed towers might be feasible from a location standpoint for purposes of the application;	<ul style="list-style-type: none"> <li>• Exhibit G, Site Search Summary, Map of Sites Searched and 4 Mile Tower Map</li> </ul>
(J) A description of efforts to share existing towers, including but not limited to installations on electric transmission poles, or to consolidate telecommunications antennas of public and private services onto the proposed facility including efforts to offer tower space, where feasible, at no charge for space for municipal antennas;	<ul style="list-style-type: none"> <li>• V. Site Selection and Tower Sharing, pages 17-18</li> <li>• Exhibit E, Site Plans</li> </ul>
(K) A description of technological alternatives and a statement containing justification for the proposed facility;	<ul style="list-style-type: none"> <li>• IV.C. Technological Alternatives, page 16</li> </ul>
(L) A description of rejected sites with a	<ul style="list-style-type: none"> <li>• V. Site Selection and Tower</li> </ul>

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U.S.G.S. topographic quadrangle map (scale 1 inch = 2,000 feet) marked to show the location of rejected sites;	<p>Sharing, pages 17-18</p> <ul style="list-style-type: none"> <li>• Exhibit G, Site Search Summary and Map of Sites Searched</li> </ul>
(M) A detailed description and justification for the site(s) selected, including a description of siting criteria and the narrowing process by which other possible sites were considered and eliminated including, but not limited to, environmental effects, cost differential, coverage lost or gained, potential interference with other facilities, and signal loss due to geographical features compared to the proposed site(s);	<ul style="list-style-type: none"> <li>• V. Site Selection and Tower Sharing, pages 17-18</li> <li>• Exhibit F, Propagation Plots</li> <li>• Exhibit G, Site Search Summary, Map of Sites Searched and 4 Mile Tower Map</li> </ul>
(N) A statement describing hazards to human health, if any, with such supporting data, including signal frequency, power density and references to regulatory standards;	<ul style="list-style-type: none"> <li>• VI.C. MPE Limits/Power Density Analysis, page 21</li> <li>• Exhibit J, Power Density Calculations</li> </ul>
(O) A statement of estimated costs for site acquisition, construction, and equipment for a facility at the various proposed sites of the facility, including all candidates referred to in the application;	<ul style="list-style-type: none"> <li>• IX.A. Overall Estimated Cost, page 32</li> </ul>
(P) A schedule showing the proposed program of site acquisition, construction, completion, operation and relocation or removal of existing facilities for the named sites;	<ul style="list-style-type: none"> <li>• IX.B. Overall Scheduling, page 33</li> </ul>
(Q) A statement indicating that, weather permitting, the applicant will raise a balloon with a diameter of at least three feet, at the sites of the various proposed sites of the facility, including all candidates referred to in the application, on the day of the Council's first hearing session on the application or at a time otherwise specified by the Council.	<ul style="list-style-type: none"> <li>• VI.A. Visual Assessment, page 19</li> </ul>
(R) Such information as any department or agency of the State exercising environmental controls may, by regulation, require including but not limited to: 1. A listing of any federal, State, regional, district, and municipal agencies, including but not limited to the Federal	<ul style="list-style-type: none"> <li>• VI.B. Solicitation of State Agency Comments, pages 20-21</li> <li>• VI.C. MPE Limits/Power Density Analysis, page 21</li> <li>• VI.D. Other Environmental Factors, pages 22-24</li> <li>• VIII. Consultation with Local, State</li> </ul>

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<p>Aviation Administration; Federal Communications Commission; State Historic Preservation Officer; State Department of Environmental Protection; and local conservation, inland wetland, and planning and zoning commissions with which reviews were conducted concerning the facility, including a copy of any agency position or decision with respect to the facility; and</p> <p>2. The most recent conservation, inland wetland, zoning, and plan of development documents of the municipality, including a description of the zoning classification of the site and surrounding areas, and a narrative summary of the consistency of the project with the Town's regulations and plans.</p>	<p>and Federal Officials, pages 30-32</p> <ul style="list-style-type: none"> <li>• VII. Consistency with the Hamden Land Use Regulations, pages 24-29</li> <li>• Exhibit I, State Agency Correspondence</li> <li>• Exhibit J, Power Density Calculations</li> <li>• Exhibit K, NEPA Summary Report</li> <li>• Exhibit N, Municipal Consultation Materials</li> <li>• Exhibit O, FAA Letter</li> <li>• Bulk Filing</li> </ul>
<p>(S) Description of proposed site clearing for access road and compound including type of vegetation scheduled for removal and quantity of trees greater than six inches diameter at breast height and involvement with wetlands;</p>	<ul style="list-style-type: none"> <li>• Exhibit E, Site Plans</li> </ul>
<p>(T) A statement explaining mitigation measures for the proposed facility including, but not limited to:</p> <ol style="list-style-type: none"> <li>1. Construction techniques designed specifically to minimize adverse effects on natural areas and sensitive areas;</li> <li>2. Special design features made specifically to avoid or minimize adverse effects on natural areas and sensitive areas;</li> <li>3. Establishment of vegetation proposed near residential, recreation, and scenic areas;</li> <li>4. Methods for preservation of vegetation for wildlife habitat and screening;</li> <li>5. Other environmental concerns identified by the applicant, the Council, or any public agency, including but not limited to, where applicable: <ul style="list-style-type: none"> <li>• Coastal Consistency Analysis</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• IV. Facility Design, pages 6-7</li> <li>• IV.C. Technological Alternatives, page 16</li> <li>• VII.B. Solicitation of State Agency Comments, pages 20-21</li> <li>• Exhibit E, Site Plans</li> <li>• Exhibit G, Site Search Summary, Map of Sites Searched and 4 Mile Tower Map</li> <li>• Exhibit I, Correspondence with State Agencies</li> <li>• Exhibit P, Redacted Lease</li> </ul>

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<p>(C.G.S. §22a-90)</p> <ul style="list-style-type: none"><li>· Connecticut Heritage Areas (C.G.S. §16a-27)</li><li>· Ridgeline Protection Zones (C.G.S. §8-1aa)</li><li>· Aquifer Protection Zones (C.G.S. §22a-354b)</li><li>· DOT Scenic Lands (C.G.S. §13a-85a)</li><li>· State Parks and Forests (C.G.S. §23-5)</li><li>· Agricultural Lands (C.G.S. §22-26aa)</li><li>· Wild and Scenic Rivers (C.G.S. §25-199)</li><li>· Protected Rivers (C.G.S. §25-200)</li><li>· Endangered, Threatened or Special Concern Species (C.G.S. §26-303); and</li></ul> <p>6. Such information as the applicant may consider relevant.</p>	