

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

North Atlantic Towers, LLC and New Cingular : DOCKET NO. 427
Wireless PCS, LLC Application for a Certificate :
of Environmental Compatibility and Public Need :
for a Telecommunications Facility Located at :
171 Short Beach Road, Branford or 82 Short :
Road, East Haven, Connecticut. : AUGUST 1, 2012

INTERROGATORIES TO APPLICANT

The following Interrogatories are directed to the Applicant by Niki Whitehead.

1. What input on site selection, if any, was provided by the Town of East Haven?
2. Did the Applicant conduct a site search in East Haven that was independent of the suggestions of the Town of Branford? If so, when was the independent site search initiated, and what were the parameters, criteria and results of the search?
3. What are the limitations imposed by FAA regulations on the location and design of cell towers in proximity to Tweed New Haven Airport?
4. What are the concerns of the Applicant with respect to lighting or marking a cell tower if required to do so by FAA regulations? Were any alternative sites or options ruled out based on the desire to avoid lighting or marking a cell tower, including (but not limited to) sites or options in the vicinity of the East Haven Industrial Park?
5. Why was the existing telecommunications facility at 60 Commerce Street in East Haven not mentioned in the Application?
6. Could one or both of the two existing telecommunications facilities on Commerce Street in East Haven be modified to improve coverage in the gap that is the subject of this Application?
7. What percentage of the coverage expected from the proposed tower at the East Haven Site is redundant (i.e. already provided by existing facilities)? What is the location of any redundant coverage? Note that the word "redundant" is not intended to include any necessary overlap for hand-off between towers.
8. What are the current and projected requirements for operating fire department equipment and conducting fire department activities on the East Haven Site (e.g. turning radius for various fire trucks, parking requirements for fire trucks and volunteers' vehicles, emergency access, routine on-site maintenance of fire equipment, etc.)? How will these requirements be affected by the loss of square

footage to the proposed telecommunications facility? What impact could these requirements have on the construction and maintainance of the proposed telecommunications facility?

9. What are the sources for the boundary information for the East Haven Site, particularly the boundaries with residential properties on Hilton Avenue?
10. Have the soils/substrate at the East Haven Site been investigated for suitability with respect to their capacity to support the proposed cell tower? If yes, please provide details and results of the investigation. If not, please explain why at least a preliminary geotechnical analysis has not being conducted given that a history of filling was reported at the Public Hearing?
11. How does the Applicant propose to compensate for the deficiencies in the visual evaluations of the East Haven Site caused by logistical and weather-related problems as reported at the Public Hearing?
12. Given that the Connecticut Department of Energy and Environmental Protection cautions that Natural Diversity Data Base information is not comprehensive and should not be substituted for on-site surveys (Application Attachment 5D), what additional investigations of Federal or State Endangered, Threatened or Special Concern Species have, or will be, undertaken in the vicinity of the East Haven Site by the Applicant?
13. For the East Haven Site, what is the basis for the Applicant's conclusion that there are no potential adverse impacts to essential wildlife habitat, including migration patterns (Application Attachment 5B, Coastal Consistency Analysis)? If the reconnaissance of the existing parking lot is the only basis for the conclusion, what additional investigations does the Applicant propose to conduct?
14. The Wetland Evaluation for the East Haven Site (Application Attachment 5B) did not include an investigation of the property to the South and immediately below the proposed cell tower location. Can the Applicant provide information on the wetlands and/or watercourse that is believed to exist in this location?

Respectfully submitted,

By: Niki Whitehead
9 Hilton Avenue
East Haven, CT 06512