

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC
(HOMELAND TOWERS) AND NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A CERTIFICATE
OF ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE AND OPERATION OF A
TELECOMMUNICATIONS TOWER FACILITY IN
RIDGEFIELD, CONNECTICUT

DOCKET NO. 445

April 17, 2014

**HOMELAND TOWERS, LLC and NEW CINGULAR WIRELESS, PCS LLC (AT&T)
RESPONSES TO RACT INTERROGATORIES**

The following Interrogatories are directed to the Applicant (both AT&T and Homeland Towers as appropriate) by the Intervenor:

- Q1. What propagation model does the applicant employ to determine calculated coverage?
- A1. *The standard propagation model in use by AT&T within the Forsk Atoll tool is the Okumura-Hata model, which is further tuned by AT&T with drive testing in this market area.*
- Q2. What is the frequency band that is depicted in the coverage plots submitted with the Application?
- A2. *Cellular (850 MHz)*
- Q3. What clutter model and what terrain data base were utilized in these calculations?
- A3. *Clutter and terrain databases are provided by the United States Geological Survey (USGS).*
- Q4. What effective radiated power and antenna type along with beam tilt, if applicable, were utilized in these calculations?
- A4. *The RF parameters of proposed sites are shown in the chart included in Attachment 1.*
- Q5. Were drive tests ("scan tests") that would verify the results of the calculated plots conducted? If so, please provide the data sets which were generated by the

tests and note whether the data needs to be corrected for variables including, but not limited to, antenna position, gain and line loss.

A5. *A drive test of existing coverage for purposes of verifying the modeling was not specifically performed by AT&T in this part of Ridgefield. Drive testing of existing coverage is periodically performed by AT&T and confirms significant gaps in coverage in this area of Ridgefield. Homeland has also analyzed existing gaps in carrier networks in this part of Ridgefield.*

Q6. Has the applicant performed continuous wave ("CW") tests from the proposed site or any other site either identified or considered?

A6. No.

Q7. In calculating the expected coverage from the proposed site, what antenna centerlines, antenna types and effective radiated power did the applicant assume would be put in use?

A7. *Please see table below:*

Site ID	Antenna Centerline (ft)	Azimuth A/B/G	Antenna Used Manufacturer/Model	Electrical Tilt A/B/G	EIRP A/B/G
S1855	146	30-150-270	Andrew/SBNH-1D6565C	0/0/0	61/61/61

Q8. Has the applicant performed a minimum height analysis to determine the minimum antenna centerline that it requires to meet its alleged coverage needs?

A8. *AT&T - Yes. In initial consultations with Homeland, AT&T had sought 180' at the proposed tower location. Pre-application RF analysis from 180' and lower confirmed that the difference between 180' and 150' in coverage gained was not enough for AT&T to deem it material for purposes of this Application. The 150' mounting elevation was identified by AT&T as the lowest height in meeting its coverage objectives.*

Q9. By what method was it determined that identified alternate sites did not meet the needs of the Applicant? If studies were conducted to confirm the utility of the alternate sites, please provide copies of those studies?

A9. *AT&T's Radio Frequency ("RF") engineers perform desktop propagation analyses to determine if a particular alternative location will satisfy the coverage objectives in a particular area, however, no written studies or reports were produced. Homeland also analyzes sites with baseline information on carrier networks and in cons*

Q10. What antenna centerlines, antenna types and effective radiated power did the applicant assume to determine expected coverage from alternate sites indicated?

A10. *AT&T's screening of sites that may be provided by real estate consultants to RF engineers for initial analyses (i.e. desktop reviews) is typically a threshold analysis using a standardized set of parameters for the market.*

Q11. Is there another combination of alternate sites that could be utilized to achieve the alleged coverage needs?

A11. *Hypothetically. The Applicants submit that it is better to utilize one single tower structure that can be shared by multiple commercial wireless carriers and the Town of Ridgefield than multiple towers in various locations in northwestern Ridgefield. The proposed tower site avoids the unnecessary proliferation of towers.*

Q12. What alternate means of achieving the alleged coverage needs have been explored?

A12. *Please see the summaries regarding site searches included in Attachment 2 of the Application and the Application narrative that includes descriptions of the Applicants and Town of Ridgefield's site searches.*

Q13. Does the applicant possess any data that support either dropped calls, customer complaints or other switch based or customer service representative based information that supports its claim of lack of service in the entire area that it claims it has a coverage issue?

A13. *AT&T - Yes. AT&T's radio frequency engineers have drive data, lost call statistics and customer complaints from various sources including its "Mark the Spot" app.*

Q14. Are there other sites in the community that is the subject of these proceedings at which the Applicant is considering developing wireless communications facilities? Please describe.

A14. *AT&T – Yes. There is a funded search ring in another part of Ridgefield unrelated technically or geographically to the site proposed in this Application.*

Q15. Please name all carriers with whom you have reason to believe will co-locate on the proposed facility.

A15. *Homeland Towers reasonably believes that Verizon, Sprint and T-Mobile would ultimately co-locate at the facility. One such carrier has inquired about the site, but lacks current funding for deployment. In addition, Homeland has planned for co-location by the Town of Ridgefield at this Facility.*

Q16. Please identify the size of the search ring and explain why that radius was chosen.

A16. *In an area such as Ridgefield AT&T begins with a ½ mile radius (1 mile diameter) search ring. This provides for a focused search of properties and locations which may be able to provide adequate coverage.*

Q17. What is the percent of dropped calls in the target area?

A17. *High relative to market averages on AT&T's UMTS network. Of note, dropped call data is not necessarily a reliable indicator of an inadequate network for various reasons. With the migration to LTE, dropped calls are less and less a meaningful metric for a carrier in assessing network performance. Particularly in AT&T's LTE network which is data centric at this point in time. Overall, reliable service relates directly to the customer experience and AT&T customers are highly mobile, making calls and using data where lack of signal strength in the network and the ability to provide circuit switched voice or packet delivered data seamlessly, reliably and with speed are an issue for the customer.*

Q18. How many residential wireless customers will this facility serve?

A18. *The Application notes that the coverage footprint of the site includes a residential population of nearly 5,000. This question would need further clarification by RACT as to the data sought, but the Applicants note that in communities like Ridgefield, most households have some form of wireless communication and often multiple device subscriptions.*

Q19. What surety does the Applicant propose to do to ensure the proper decommissioning of the facility once it is no longer needed or in use? And will the Applicant provide a bond to ensure decommissioning?

A19. *Any approved facility will be subject to a final decision and order by the Connecticut Siting Council. A standard condition of a CSC Decision and Order for a tower facility includes a provision that, should the facility cease to provide wireless services for a period of one year, the Decision and Order is void and the Certificate Holder must dismantle the tower and remove all associated equipment or otherwise reapply to the Siting Council for continued use. The Certificate holder is subject to such conditions and no other surety or bond is proposed by the Applicants.*

Q20. Please describe the methods used by your visual impact consultant to calculate seasonal visibility.

A20. *The methods employed by the visual consultants are set forth in the report included in Application Attachment 5. Information used in their computer model included LiDAR-based digital elevation data and customized land use data layers developed specifically for this analysis. The LiDAR-based Digital Elevation Model*

(DEM) represents topographic information for the state of Connecticut and has a horizontal resolution of ten (10) feet. In addition, multiple land use data layers were created from aerial photography (1-foot resolution, flown in 2012). Image processing tools developed light reflective classes defined by statistical analysis of individual pixels, which were then grouped based on common reflective values so that distinctions could be made automatically between deciduous and coniferous tree species, as well as grassland, impervious surface areas, surface water and other distinct land use features. These layers were subsequently entered into the model.

First, only topography (based on the DEM) was used to evaluate potential visibility with no intervening vegetative screening. The model was queried to determine where at least the top of the Facility may be seen from any point(s) within the two-mile Study Area, given the intervening existing topography. The initial omission of the forest cover data layer exaggerated areas of visibility because it assumed unobstructed sight lines everywhere but in those locations where intervening topography rises above the height of the proposed Facility. However, this technique provided initial identification of direct sight lines, useful for evaluating potential seasonal views when the leaves are not on the trees.

Secondly, a conservative set of values was then incorporated into the model, including the assumptions that each tree is simply a vertical pole with no distinct branching pattern and no understory is present. The Study Area includes mature vegetation with a unique composition and density of woodlands, with mast or pole timber and branching providing the majority of screening in leafless conditions. Beyond the density of woodlands found within the Study Area, each individual tree has its own unique trunk, pole timber and branching pattern characteristics that provide varying degrees of screening in leafless conditions which cannot be adequately modeled. Because tree spacing, dimensions and branching patterns as well as the understory differ greatly over even small areas, the Study Area has its own discrete forest characteristics. With these conservative assumptions, the modeling results in an over-prediction of visibility in "leaf-off" conditions.

Third, field verification assisted in cross-checking the model's results. Using both the topography-only map and a second iteration (incorporating a 50-foot tall average tree canopy height) during the balloon float, we visually surveyed the Study Area in an attempt to determine the extent of seasonal visibility. However, because the leaves were still on the trees at the time of the balloon float, no significant edits were made to the model with respect to seasonal variations

Finally, an average tree canopy height of 65 feet was incorporated into the final version of the visibility mapping, with all the model assumptions described above held constant.

Q21. What studies did you undertake to eliminate alternate technologies from consideration given that they are of lesser impact to surrounding property uses?

A21. *The premise of the question that alternate technologies have a "lesser impact to surrounding property uses" has no foundation or evidentiary support. To the extent RACT is referring to outdoor distributed antenna system (DAS) the Application notes on page 13 that such technology was ruled out as not practicable or feasible for purposes of this facility in Ridgefield. RACT is referred to various PURA decisions which, coupled with terrain in Ridgefield, effectively rule out use of DAS as a threshold consideration.*

Q22. Please provide the feasibility studies or data by which you determined the lack of feasibility?

A22. *Please see A21.*

Q23. Have you considered using a combination of two shorter towers just above treeline to cover the target area?

A23. *AT&T did not consider two shorter towers. In considering RACT's siting theories as articulated in its response to interrogatories and its intervention request, AT&T did analyze the area further and concluded that if a tower was not constructed in this general location somewhere along the ridgeline, three tower sites would be needed to replicate the coverage from the proposed single tower site solution (two to the south and 1 to the north).*

Q24. Is there a particular standard or decibel signal strength which you believe is necessary for adequate coverage for PCS (1900 MHz) service in the target coverage area? For 850 MHz service? For 700 MHz?

A24. *AT&T's network in this part of Connecticut has historically served customers on 850 and 1900 MHz using GSM and UMTS technologies. For this use and technology, the design criteria has been -74 dBm for in-building reliable service and -82dBm for in-vehicle reliable service. As the network moves toward LTE technology, and to meet the demands for faster data throughput which equates to customer experienced speed and reliability, AT&T uses the following design thresholds for the LTE (4G) network: -83 and -93dBm for 700Mhz LTE (base platform), -86 and -96dBm for 1900MHz LTE (capacity off-load for the 700MHz LTE). Currently, many customers remain on UMTS on 850 and 1900 bands. Those customers will need to continue to be supported as they are migrated from 3/3.5G to 4G LTE service so AT&T continues to consider UMTS (3G) as an important service to provide, during the evolutionary period to LTE (4G)*

Q25. What particular dBm signal strength do you believe is necessary for in-vehicle coverage for PCS (1900 MHz), 700 MHz and 850 MHz in the target area?

- A25. See A24.
- Q26. In the proposed coverage maps submitted by the Applicant, what loss margin was assumed in the modeling?
- A26. *This specific information as it relates to the noise floor and network design is considered proprietary and confidential by AT&T. As noted on the coverage maps though, incorporated into the UMTS design is an 8 dBm offset for vehicle and building penetration losses.*
- Q27. For any signal strength predicted by your coverage modeling, what percent-of-locations is assumed for reliability? (e.g.: 85% of locations, 95%?)
- A27. *This specific information is considered proprietary and confidential by AT&T, but noted to be consistent with industry standards.*
- Q28. Are you assuming that your target coverage is "reliable service" or "adequate coverage"? Do these two terms differ? How do you define these two terms for the purposes of meeting the goals of the Telecommunications Act of 1996?
- A28. *The Telecommunications Act of 1996 (the "Act") as relevant to this proceeding includes a requirement that state and local governments allow all wireless carriers to provide "service". See 47 U.S.C. 332(c)(7). In the area intended to be served by a tower facility in this Application, the service is not reliable or adequate for customers within the general understanding of what those terms mean to the customer.*
- Q29. How many residences (as opposed to acres) will have year round views of the proposed towers? Seasonal views?
- A29. *Mr. Libertine estimates that partial year-round views of at least a portion of the tower could be achieved from areas on approximately 21 residential properties. Seasonally, when the leaves are off the deciduous trees, an additional 40± residential properties may have obstructed views of at least a part of the tower. Field verification activities during the balloon float are restricted to publicly accessible areas, so we rely on the computer model to compile a comprehensive list of residential properties that could have views of the tower. The model also has its limitations because is designed to answer a very simple yes-no question: can at least the top of the tower be seen from any point within a 2-mile radius (Study Area), given the intervening topography and vegetation. Theoretically, if one inch of the tower is detected from any point X in the Study Area, it is considered visible, although in real world conditions the tower might not be discernable to the human eye. Therefore, the calculations tend to over predict*

visibility. This is a conservative analysis that evaluates potential visibility from a residential property by interpreting if a property falls within shaded areas of potential visibility on the Viewshed Maps presented in Tab 5 of the Application. It does not necessarily mean that views would be achieved from within residential dwellings, exterior decks, porches or patios that might be located on such properties. It may be possible to view the tower from within portions of shaded areas on the Viewshed Maps, but not necessarily from all locations within those shaded areas.

- Q30. Your visual impact analysis indicates that a large portion of the visibility of the tower will occur over open space lands owned by the town conservation commission for recreational trails. Did you simulate any of the views from the recreational trails? Or in any way determine the impact to the scenic views of tourists and residents using the open space for recreation?
- A30. *The open space surrounding the site that is owned by the Town currently has no formal system of recreational trails, although they are planned in the future. This is the same property the Town had proposed for development of a tower and until 2011/2012 had been private property with development potential. Once the property was acquired by the Town, what were access drives previously cut into the property have been used as informal passive recreation trails and for use by hunters as part of the Town's sanctioned deer hunt. As evidenced by the correspondence to the Applicant and Council from the Town Conservation Commission, the Conservation Commission is not opposed to the project and has not stated the tower site will create adverse scenic impacts on or off-site. It and Applicant Homeland Towers both note there will be some visibility of the tower site from areas that were previously private site drives and are now used as trails on Town open space land. The Town Conservation Commission has asked for some plantings along one of the access drives/trails to screen the tower enclosure, particularly along the downhill side of the trail, which the Applicant has committed to doing as part of the Development and Management Plan with input from the Town, should the project be approved by Council. No simulations were prepared from the open space area, and the area will be viewed by the Council at the site visit on April 24th.*
- Q31. What is the percentage of dropped calls and ineffective attempts, as compared to the remainder of the Market Trading Area for the Ridgefield area?
- A31. *Please see A13 and A17.*
- Q32. What is the lowest height you can construct a tower to improve coverage (with and without co-located carriers)?

A32. Coverage "improvement" could in theory be gained by a transmitter at any height above ground level. The Applicants submit that a 150 foot tower would allow for AT&T, the Town of Ridgefield and other wireless carriers to provide reliable services in an area that currently experiences a lack of coverage dating back to the inception of today's mobile communications networks. Lower heights will impact co-location and in particular coverage to the north.

Q33. Has the Applicant determined whether the area of the proposed facility is served by fiber optic cable?

A33. Backhaul options will be further assessed post any approval by the Siting Council. Fiber is the preferred modality when available or able to be extended to a tower facility.

Q34. Please identify how many other future sites will be necessary, at a minimum to accomplish adequate coverage for the target municipality.

A34. Ridgefield is a geographically large town with varied topography, hence the name. AT&T has currently identified at least three additional locations within Ridgefield where future siting is likely. AT&T considers the disclosure of search areas to be proprietary, but notes that none of these additional locations are technically interrelated to the site proposed in this Application. Of note though on one site search area, discussions did take place with various Town of Ridgefield officials regarding a school site in the search area which the Town declined to make available for a tower site.

Q35. Please identify any sites in addition to the Proposed Facility on which the Applicant intends to seek permission from the Siting Council to construct or modify a facility in the Ridgefield area (Ridgefield and adjacent towns)?

A35. Please see A34. In addition, please note that sites in adjacent New York municipalities would be regulated by those communities.

Q36. Will construction practices for the proposed facility conform to local building and zoning ordinances and regulations?

A36. Construction practices will conform to state building codes and regulations. An analysis of the proposed facility's conformance with local zoning regulations is provided in the Application starting on page 20.

Q37. Can you provide coverage propagation maps and isolated propagation maps for the proposed facility on clear plastic overlays using a scale that matches that of the Application at 4 dBm intervals?

- A37. *Attachment 2 provides a color copy of a plot at 850 Mhz with thresholds from -75 to -95 at 10 db increments. 4 dBm intervals are difficult to read at the scale and the plots in the Application already have an 8 dBm interval (ie. -74 to -82). To the extent RACT seeks to have plastic overlays of the attachment made or further plots prepared, the Applicants respectfully submit that their consultant Mr. Maxson should provide those services to RACT.*
- Q38. *What is the minimum dBm signal strength to accomplish hand off of a call to an adjacent cell for 700MHz, 850 MHz and 1900 MHz?*
- A38. *Please see A24, as well as responsive comments on the evolution to data-driven service. Voice service historically was circuit service which required "hand offs" or handovers. A data service (or a voice service over data, such as VoLTE) is a packet service where traditional handovers do not take place but packets are sent, checked and either discarded (if corrupt) or used (if sound). Therefore, signal strength for "hand off" is not a meaningful concept in a 4G LTE environment.*
- Q39. *What are the coordinates, antenna types, orientations, tilt, EIRP for all of the Applicant's wireless facilities in Ridgefield and adjacent towns?*
- A39. *Please see the table included as Attachment 1 for CT sites. NY information is being gathered which is another market within AT&T and will be supplemented at a later date.*
- Q40. *In light of the likely presence of the federally endangered bog turtle, have you submitted a NEPA application describing impact and mitigation methods to protect the bog turtle? If so, please provide a copy of the same.*
- A40. *The bog turtle is not likely present on site as recently confirmed in consultation with the Connecticut Department of Energy and Environmental Protection ("CTDEEP") Wildlife Division DEEP. Turtle and wetland protection protocols have been developed and are included in the Responses to Siting Council Interrogatories (Set I) as Attachment 4. Correspondence was received on March 25, 2014 from DEEP regarding a protection plan proposed for both Federally Endangered Bog Turtle and State Special Concern Eastern Box Turtle. A copy of the March 25, 2014 email and the turtle protection plan that was submitted to CTDEEP for review is included in Attachment 3. Laura Saucier responded in the March 25th email that "The issue with bog turtles is going to be sedimentation and/or erosion associated with construction that potentially could affect the Titcus River system." As a result of Ms. Saucier's comments, the original protection plan was modified to only reference Eastern Box Turtle and include protocols and measures to protect the nearby wetland area that is part of the Titcus River*

headwater watershed to ensure the protection of Bog Turtle habitat associated with the Titicus River system. This modified protection plan was included in the Responses to Siting Council Interrogatories (Set I) as Attachment 4.

Q41. Has the Applicant (AT&T) or Homeland Towers constructed a wireless facility in Connecticut with less than 10 foot separation between antennas (bottom tip end to top tip end as opposed to centerline to centerline)? If so, how many?

A41. *This information is not readily maintained by the Applicants and RACT is referred to the Council's database for its own research on the hundreds of tower sites located in Connecticut. In general, tower manufacturers, developers and wireless carriers utilize a 10' platform separation for several reasons including antennas space requirements, construction, operation and maintenance consistency and general avoidance of carrier to carrier interference. AT&T's current configuration utilizes 8-foot multi-band antennas, RRU's, and other tower mounted equipment all of which support the need for a standardized 10' separation.*

Q42. Please identify the sites which form the basis for your response in the preceding Interrogatory.

A42. *Please see A41.*

Q43. Has the Applicant (AT&T) or Homeland Towers constructed a wireless facility in states sharing a border with Connecticut with less than 10 foot separation between antennas (bottom tip end to top tip end as opposed to centerline to centerline)? If so, how many?

A43. *Please see A41.*

Q44. Please identify the sites which form the basis for your response in the preceding Interrogatory.

A44. *Please see A41*

Respectfully submitted,

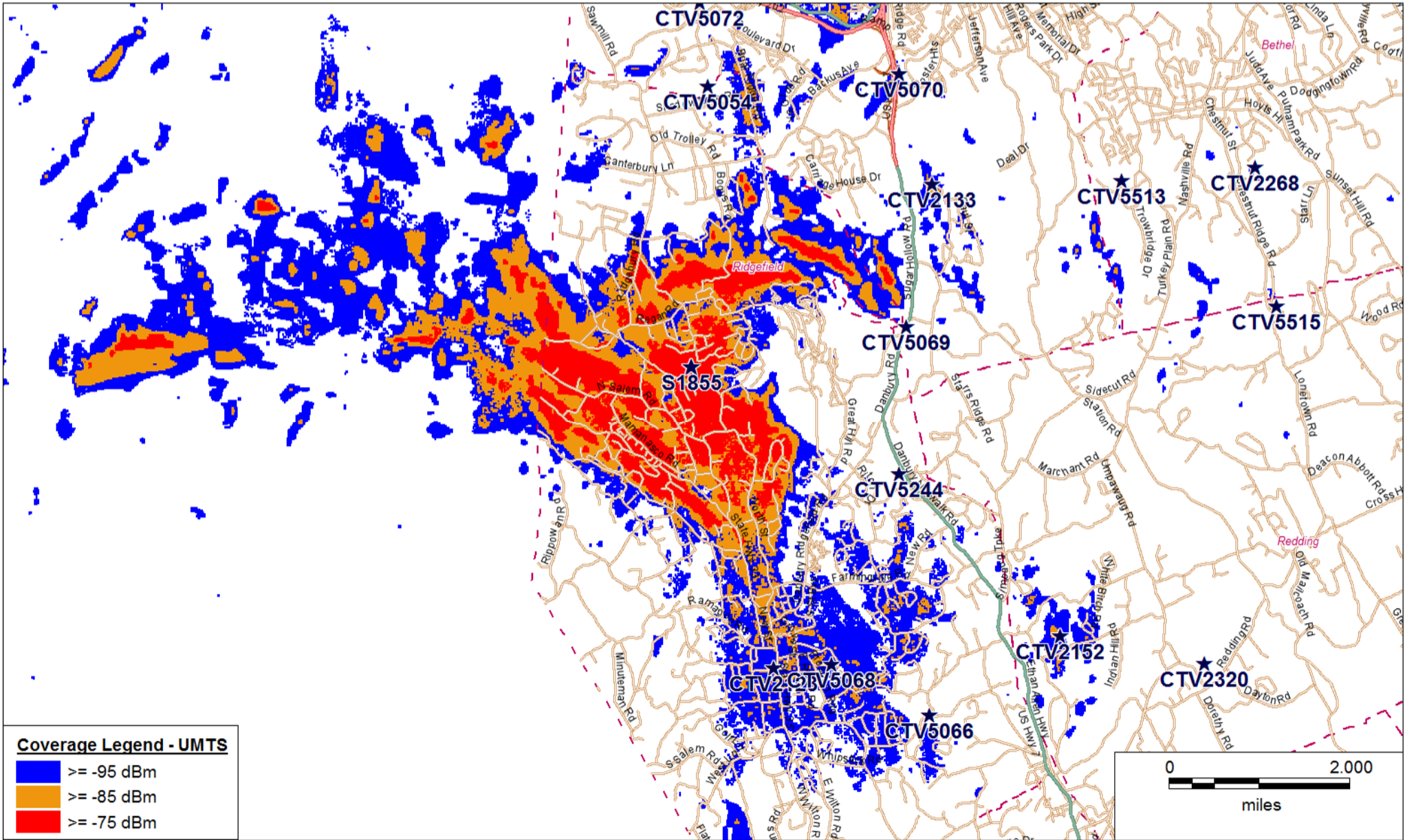
By: 

Christopher B. Fisher, Esq.
Cuddy & Feder, LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
(914) 761-1300

ATTACHMENT 1

Site ID	Longitude	Latitude	Address	Town	State	Structure Type	Antenna	Azimuth	Antenna Used	Electrical Tilt	EIRP
							Centerline (ft)	A/B/G	Manufacturer/Model	A/B/G	A/B/G
CTV2123	-73.49936	41.281936	10 CATOONAH STREET	RIDGEFIELD	CT	MONOPOLE	58	143-263-23	Powerwave/7770	2/0/7	61/61/61
CTV2133	-73.465471	41.35952	MOSES MOUNTAIN	DANBURY	CT	SELF SUPPORT	68	141-262-20	Powerwave/7770	6/6/4	57.78250792/57.91287247/57.61489637
CTV2156	-73.526352	41.393239	119 MILL PLAIN ROAD	DANBURY	CT	ROOFTOP	50	105-260	Powerwave/7770	8/0	57.95011948/57.95011948
CTV5054	-73.513299	41.375092	900 RIDGEBURY ROAD	RIDGEFIELD	CT	ROOFTOP	39	90-210-330	Kathrein/800 10121	6/9/3	58.15497805/58.15497805/58.15497805
CTV5068	-73.486899	41.282492	95 HALPIN LANE	RIDGEFIELD	CT	UTILITY	115	30-150-270	KMW/AM-X-CD-14-65-00T-RET	8/5/8	61/61/61
CTV5069	-73.471099	41.336692	66 SUGAR HOLLOW ROAD	DANBURY	CT	MONOPOLE	108	0-120-240	Powerwave/7770	2/0/2	61/61/61
CTV5070	-73.472499	41.377192	83 WOOSTER HEIGHTS ROAD	DANBURY	CT	ROOFTOP	64	347-197-278	Powerwave/7770	2/2/2	58.51272616/58.51272616/58.51272616
CTV5072	-73.514999	41.388592	18 OLD RIDGEBURY ROAD	DANBURY	CT	ROOFTOP	106	80-150-389	Kathrein/800 10121	6/4/4	57.87946598/57.87946598/57.87946598
CTV5244	-73.472499	41.312992	845 ETHAN ALLEN HIGHWAY	RIDGEFIELD	CT	UNIPOLE	67	0-120-240	KMW/AM-X-CD-14-65-00T-RET	2/2/2	61/61/61

ATTACHMENT 2



AT&T Stand-Alone Coverage at Ridgefield, CT with S1855 @ 150' AGL

ATTACHMENT 3

From: [Saucier, Laura](#)
To: [Dean Gustafson](#)
Subject: RE: Homeland Towers - Ridgefield NDDB #201305326
Date: Tuesday, March 25, 2014 9:55:15 AM

Hi Dean,

Again, sorry for the delay. Thank you for providing these turtle protective measures for review. Here are my comments:

Bog turtles

It is unlikely that bog turtles will be in the project area so I do not think that the measures, signage or education for this species is warranted. Please omit signage about bog turtles. The issue with bog turtles is going to be sedimentation and/or erosion associated with construction that potentially could affect the Titicus River system.

Erosion and sedimentation control measures

While fiber rolls/wattles are typically shorter (8-inches) than traditional silt fencing they still create an impediment to migrating wildlife, especially smaller less mobile groups, such as reptiles and amphibians. A common practice when using fiber rolls/wattles is to leave them in place to biodegrade over time. The amount of time it takes for them to biodegrade varies and depends on the materials they are made of and the environmental conditions on-site; some literature notes anywhere from 6 months to 8 years. Due to this variability, we recommend that:

- Fiber rolls/wattles should NOT be left in place to biodegrade. They should be removed promptly after soils are stable as they still create a barrier to migrating wildlife.
- Seeding should not spread over fiber rolls/wattles as it makes them harder to remove once soils are stable.
- Fiber rolls should be cut into 10 to 20-meter sections and placed so that there is a 12-inch gap between sections. A second row should be placed 12-inches behind the first row and staggered so that wildlife can navigate through the barrier but not compromise the integrity of the erosion control measure. Please contact me if you have questions.

Isolation and protective measures

I concur with both your isolation and protective measures for box turtles.

Reporting

I concur with your reporting specifications.

Let me know if you have questions.

-Laura

Laura Saucier

Connecticut Department of Energy and Environmental Protection
Wildlife Diversity Program
Wildlife Division
P.O. Box 1550, 341 Milford Street
Burlington, CT 06013
Phone (860) 675-8130, Fax (860) 675-8134
laura.saucier@ct.gov



From: Dean Gustafson [mailto:dgustafson@allpointstech.com]
Sent: Thursday, January 30, 2014 8:09 AM
To: Saucier, Laura
Cc: McKay, Dawn
Subject: RE: Homeland Towers - Ridgefield NDDB #201305326

Good morning Laura,

Thank you for your comments. Please find enclosed our response to your recommendations for protection of bog turtle and eastern box turtle during construction of the referenced proposed Homeland Towers facility in Ridgefield.

We are assuming the potential for impact to eastern box turtle habitat so the enclosed protection plan includes a comprehensive suite of conservation and protection measures to avoid inadvertent injury or mortality to eastern box turtle during construction (in addition to protection of bog turtle habitat). As a result, we do not feel there is a need to perform surveys to see if eastern box turtle are present on the subject property. We have successfully used this strategy on numerous other consultations for these types of projects with this species in the past, as Dawn can attest to.

Please feel free to contact me with any questions or comments and I look forward to your response.

Sincerely,
Dean

Dean E. Gustafson
Senior Environmental Scientist



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860.663.1697 ext. 201 (office)

dgustafson@allpointstech.com

From: Saucier, Laura [mailto:Laura.Saucier@ct.gov]
Sent: Sunday, January 12, 2014 7:34 PM
To: Dean Gustafson
Subject: Homeland Towers

Dean,

Attached are Wildlife Division comments on state-listed species with regards to Homeland Towers proposal in Ridgefield. Let me know if you have questions.

Regards,

Laura

Laura Saucier

Connecticut Department of Energy and Environmental Protection

Wildlife Diversity Program

Wildlife Division

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