

STATE OF CONNECTICUT
SITING COUNCIL

Florida Tower Partners LLC d/b/a North Atlantic Towers
Application for a Certificate of Environmental Compatibility
and Public Need for the construction, maintenance,
and operation, of a telecommunications facility at one of two
locations at Bethel

Tax Assessor's Map 65, Block 57, Lot 122
62-64 Codfish Hill Road, Bethel, Connecticut.

: DOCKET # 458

RESPONSES TO APPLICANT'S INTERROGATORIES

The following are responses to the Applicant's Interrogatories by the Codfish Hill
Environmental Trust.

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

December 31, 2013

2. Please identify all members of CHET, including the names and addresses of each member.

CHET members include: Mark and Gilleen Reinders 86 Codfish Hill Rd. Bethel, CT 06801;
Leon Kurjiaka residence is 14 Wixted Avenue, Danbury, CT but owns the property at 80-82
Codfish Hill Rd. Bethel, CT 06801; Caryl Kirschbaum #12 Twin Maple Drive, Bethel, CT 06801;
Leada Bedriy: #14 Twin Maple Drive Bethel, CT 06801; Sue White #8 Twin Maple Drive, Bethel,
CT 06801 Gordana Bogdan #90 Codfish Hill Rd. Bethel, CT 06801:

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.

The tower is an industrial type structure in a rural and bucolic setting. As the proposed
towers are significantly above the treeline, are proposed for a geographically elevated location
and are completely out of keeping with the architectural vernacular of the area, they will pose a
jarring contrast to the scenic viewshed of the surrounding area.

Additionally, the parcel where both sites are being proposed is on a hill top and is one of the
highest elevations in Bethel and especially in our area. Because of this they would be easily

visible from numerous sites as far away as the entire Bethel school campus, Linda Lane, Kellogg Lane and many parts of Codfish and Wolfpits Roads.

Codfish Hill Rd. is considered one of the most visually appealing, beautiful rural neighborhood areas in Bethel. It is a highly desired living location because of the natural beauty of the hill. A monopole with multiple arrays sitting on it is so terribly out of character and would necessarily draw all attention to its presence because of the degree to which it starkly contrasts and damages the view on the Hill.

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

The viewshed within approximately a 1 mile radius of the proposed towers would be impacted as noted in the visual impact analysis submitted with the Application.

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.

The visual impact analysis submitted with the Application was sufficient for CHET to determine that the public trust in the viewshed surrounding Codfish Hill would be impacted. CHET conducted no other tests, but will observe the balloon float on the day of the hearing. No one in the area was given notice of the previous balloon test, so no observations could be made at that time.

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 .

See response to #3 above.

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.

See response to #3 above. Despite Applicant's incorrect assertions to the opposite, scenic views are natural resources of the state of Connecticut which are protected by a number of statutes including the ones governing the siting of cell towers.

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.

Please see the response to #7 above.

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?

There is an existing structure, a utility stanchion in the middle of the Orchard to the north which would provide some coverage to the Rt 302 area plus new coverage to Old Hawleyville Rd and a portion of Plumtrees Rd.

Another existing structure, a transmission stanchion at the edge of the High School soccer field (more than 250ft from the school itself), would provide coverage to complement the Orchard existing stanchion coverage. Together, these two would likely provide more coverage in Bethel than the proposed.

CHET has not confirmed whether these locations are available, but CHET is aware that the owners of transmission lines have allowed such co-location in fulfillment of the CSC's policy on non-proliferation of towers and sharing on existing structures.

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

CHET does not design tower configurations but believes that there are existing co-located antennas on other utility transmission stanchions which could easily serve as examples.

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.

Using a flagpole (minus the flag) type monopole or a monopole with a radome cover would reduce the visual mass and would reduce the jarring aspect of the proposed antenna platform configuration.

CHET does not create design diagrams of towers or antenna installations, but such configurations are well known to the Council and the Applicant.

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

CHET intends to submit pre-filed testimony from its members who are neighboring property owners to the proposed sites and that testimony is submitted separately from these interrogatories in accordance with Council practice.

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.

The CHET pre-filed testimony speaks for itself. None of the witnesses will be speaking as expert witnesses and none have performed any studies to provide the testimony. They are relying on their knowledge as neighboring property owners.

Respectfully Submitted,

CHET,

By _____
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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 26th day of May, 2015 and addressed to:

Ms. Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

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