



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

PARTY STATUS REQUEST FORM

Docket/Petition No.

502

Town/City

Woodbridge

Date

June 22, 2021

Name:

Ochsner Place, LLC

Street Address:

15 Soundview Drive

City, State, Zip:

Woodbridge, CT 06525

Contact Number:

(203) 218-9425 (Joel Z. Green, Esquire)*

E-mail:

jgreen@gglaw.net

*c/o Green and Gross, P.C., 1087 Broad Street, Bridgeport, CT 06604

1. Manner in which party's legal rights, duties, or privileges will be specifically affected by the agency's decision in this contested case:

See attached.

2. Manner and extent to which party proposes to participate:

See attached.

3. Statutory authority for party status request:

Connecticut General Statutes Section 16-50n and Section 22a-19.

4. Nature of evidence that the party intends to present:

Documentary evidence and oral testimony concerning the issues described above.

Copies of this request are required to be electronically mailed to all participants on the service list of a **pending** matter, which can be found on our website in Pending Matters under the appropriate docket or petition number.

Signature



Date

June 22, 2021

Petition to Intervene and Be Granted Party Status Re: Siting Council Docket No. 502

Name: Ochsner Place, LLC, Michelle Greengarden and Mark Greengarden (the "Petitioners")

Street Address of Petitioners: 15 Soundview Drive, Woodbridge, CT 06525

Contact Information for Petitioners' Counsel:

Joel Z. Green, Esq.
Linda P. Laske, Esq.
The Law Offices of Green and Gross, P.C.
1087 Broad Street
Bridgeport, CT 06604
(203)335-5141
E-mail: jgreen@gglaw.net

1. Manner in which party's legal rights, duties or privileges will be specifically affected by the agency's decision in this contested case:

The Petitioners, Mark Greengarden and Michele Greengarden, are the members of Ochsner Place, LLC, which owns the property located at 15 Soundview Drive in Woodbridge (the "Petitioners' Property"). Mark Greengarden is the managing member of Ochsner Place, LLC.

Mark Greengarden and Michele Greengarden reside in a house located upon the Petitioners' Property.

The Petitioners' Property abuts the property at 118 Newton Road where Cellco Partnership, d/b/a Verizon Wireless (the "Applicant") proposes to locate a wireless telecommunications facility (cell tower) pursuant to the pending application before the Siting Council, which has been designated Docket No. 502 (the "Application").

The Petitioners' rights, duties and privileges will be specifically affected by the decision of the Siting Council on the Application in several ways. The proposed tower will negatively impact the Petitioners' use and enjoyment of their property, as well as its value and marketability. The large commercial structure is not in keeping with the wooded, residential neighborhood. It will be prominently visible from the Petitioners' Property and will cause despoliation of the existing bucolic, wooded viewscape.

Further, the Application will impact the Petitioners' use of Soundview Drive which is adjacent to and provides the sole means of ingress and egress to the Petitioners' Property. The Applicant proposes to create an accessway from Soundview Drive to the proposed cell tower site upon 118 Newton Road and to use Soundview Drive for construction and maintenance of the proposed facility. That use, and the proposed alterations to the existing roadbed and drainage structures, are not consistent with the existing residential cul de sac and subdivision plan for Soundview Drive and are likely to interfere with the function of existing catch basins, alter drainage patterns, and cause flooding on the street and on the Petitioners' Property.

The Petitioners also seek party status pursuant to Section 22a-19 of the Connecticut General Statutes, to protect important environmental resources of the State of Connecticut including scenic vistas.

2. Manner and extent to which party proposes to participate:

Petitioners seek to appear and participate as parties at the hearing on the Application, including by appearing, presenting evidence, and cross-examining witnesses, for the purpose of demonstrating that the decision of the Siting Council will affect the Petitioners' legal rights, duties and privileges, and that the Application should be denied because the proposed facility location is not appropriate and fails to satisfy required standards of environmental compatibility and public necessity.