

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF HOMELAND TOWERS,	:	DOCKET NO. 509
LLC FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY AT	:	
1837 PONUS RIDGE ROAD, NEW	:	
CANAAN, CONNECTICUT	:	MAY 6, 2022

VERIFIED PETITION TO INTERVENE AS PARTY UNDER
GENERAL STATUTES § 22a-19 (a)

Mark Buschmann of 359 Dan's Highway, New Canaan, Connecticut hereby intervenes in the above-captioned matter pursuant to C.G.S. §22a-19 and applicable law and states the following:

1. The Connecticut Siting Council is the agency with jurisdiction over applications for Certificates of Environmental Compatibility and Public Need for the construction, maintenance and operation of telecommunications facilities in the State of Connecticut pursuant to C.G.S. §§ 16-50g, et seq.
2. By application dated April 13, 2022, Homeland Towers, LLC made application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of telecommunication facilities on property at 1837 Ponus Ridge Road, New Canaan, Connecticut.

3. The Connecticut Siting Council accepted the application, known as Docket No. 509, and must make a decision on the application on or before September 10, 2022.
4. The undersigned states that the activities proposed by the applicant, Homelands Towers, LLC, and which are the subject of its application are reasonably likely to have the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of this state in that:
 - a. The applicant, Homeland Towers, LLC, has failed to provide the Connecticut Siting Council with sufficient information to allow it properly to evaluate the environmental impact of the proposed cellular communications tower on the wetlands and watercourses on and adjacent to the proposed cellular communications tower site, both with respect to the identification and delineation of the wetlands and their characteristics and functions.
 - b. The construction and operation of the proposed cellular communications tower which is the subject of the Homeland Towers, LLC application is reasonably likely to result in a significant adverse impact to avian populations, particularly migrating songbirds and waterfowl, and to listed species reported in the area and their habitat.
 - c. The topography of the proposed location of the cellular communications tower site is steep, vulnerable to erosion, and in close proximity to the Laurel Reservoir, a high-quality public water supply source recognized by the Connecticut Department of Public Health pursuant to C.G.S. § 25-33q, and the construction, maintenance and

use of the tower is reasonably likely to adversely affect the water quality of Laurel Reservoir.

- d. As proposed, the tower will be visible from Wren Knolls, large portions of Centennial Watershed State Forest, and properties along the shore of Laurel Reservoir, and will have a significant adverse visual impact due to the topography of the location.
 - e. The applicant has failed to propose alternatives to the currently proposed location for the cellular communications tower which is the subject of its application that would have lesser adverse impact on the natural resources identified above.
5. General Statutes §22a-19 (a) authorizes any person who files a verified petition as described in the statute to intervene in any administrative, licensing or other proceeding and in any judicial review thereof made available by law. The words “in any administrative, licensing or other proceeding” in General Statutes § 22a-19 (a) have been construed to include intervention in pending Connecticut Siting Council proceedings. See, e.g., Connecticut Coalition Against Millstone v. Connecticut Siting Council, 286 Conn. 57, 942 A.2d 345 (2008).

WHEREFORE, on this 6th day of May, 2022, the undersigned hereby intervenes as a party in these proceedings pursuant to General Statutes § 22a-19 (a) for the purpose of protecting the public interest in the aforementioned natural resources.

INTERVENOR

By 
MARK BUSCHMANN

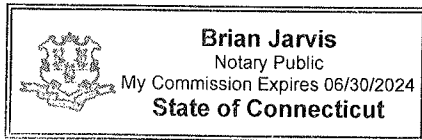
VERIFICATION

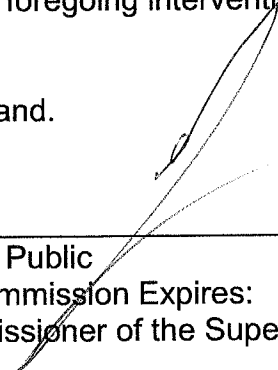
STATE OF CONNECTICUT)
COUNTY OF Fairfield)

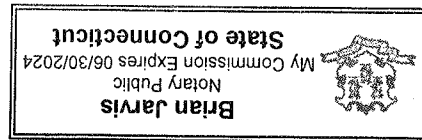
ss. STAMFORD

Before me, the undersigned, this 6 day of May, 2022, personally appeared Mark Buschmann, intervenor in the above-captioned administrative proceeding, who, being duly sworn, made oath to the facts stated in the foregoing intervention petition, to the best of his knowledge, information and belief.

In Witness Whereof, I hereunto set my hand.




Notary Public
My Commission Expires:
Commissioner of the Superior Court



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on May 9th, 2022.

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