

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 : JUNE 14, 2022

PARTY MARK BUSCHMANN, TRUSTEE'S
PREHEARING INTERROGATORIES TO THE APPLICANT

Party Mark Buschmann, Trustee, submits the following interrogatories to the applicants, Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T.

1. Please provide the names and addresses of the members of 1837 LLC, owner of 1837 Ponus Ridge Road, New Canaan, Connecticut.
2. Please provide a copy of the deed by which 1837, LLC acquired title to 1837 Ponus Ridge Road, New Canaan, Connecticut.
3. Please explain the discrepancy in the boundary delineation of 1837 Ponus Ridge Road between the survey at p. 6 of 18 of attachment 4 to the application and the survey referenced in General Notes no. 10 to that survey.
4. Page 5 of 28 of the "Narrative" accompanying the application states that "[t]he facility will be unmanned with no sanitary or water services and will generate on average 1 vehicle trip per month by each wireless carrier consisting of a service

technician in a light duty van or truck.” Will the access drive be plowed during winter months, and if so, what road treatments will be used on the access road?

5. Page 17 of 28 of the “Narrative” accompanying the application states that “[n]o direct impacts to any wetlands or watercourses are anticipated.” Have potential indirect impacts to wetlands or watercourses been evaluated? If so, please describe them.

6. Page 9 of 18 of attachment 4 to the application shows the use of diesel generators. Your response to the Siting Council’s interrogatories indicates that propane generators will be used. Please provide the type and fuel source of generators which will be used and the total number of generators and fuel sources to be located within the compound.

7. Does your response to interrogatory 6 require a modification of the plan provided in attachment 4 to the application showing the compound area? If yes, please provide a copy of the modified plan.

8. Please name the individual who identified the trees in the tree survey table at page 3 of 18 of attachment 4 to the application and provide a copy of his or her resume or a summary of his or her professional qualifications.

9. Page 9 of 22 of attachment 6 to the application states that “APT recommends a review of the final site plans to assess potential impacts to Wetland 1 due to its sensitivity being a contributing resource to a nearby public water supply resource (Laurel Reservoir).” Has such a review been conducted? If yes, please provide a copy.

10. In page 2 of 42 of attachment 9 to the application, Brian Gaudet of All-Points Technology Corporation, P.C., states: "APT completed an independent review of the National Register of Historic Places ("NRHP") and SHPO files to determine if any listed sites, or sites eligible for listing, are located proximate to the Site. The results of our review revealed that no such resources are located within one-half mile of the site." Please explain how APT determined whether any sites eligible for listing on the NRHP were located within one-half mile of the site, and what investigation was undertaken of any potential sites identified.

11. With respect to the northern long-eared bat (*Myotis septentrionalis*), in attachment 9 to the application at page 6 of 42, Dean Gustafson of All-Points Technology Corporation, P.C., states: "Homeland would consider the following additional USFWS voluntary conservation measures, where appropriate and as the project schedule allows, as encouraged in the April 29, 2016 FCC Public Notice, to reduce the potential impacts of activities in [northern long-eared bats]," which measures he then enumerates. Will the applicants undertake the conservation measures listed?

12. In attachment 9 to the application at page 7 of 42, Dean Gustafson of All-Points Technology Corporation, P.C., states: "Construction-phase protection measures and time of year restrictions for eastern box turtle, little brown bat, and red bat are identified in the January 7th NDDDB letter. APT understands that Homeland will implement the recommended protection measures during construction and adhere to the time of year

restrictions to protect state-listed species.” Will the applicants undertake the recommended protection measures listed in the January 7th NDDB letter?

13. Has a geotechnical analysis been performed in connection with the construction of the proposed telecommunications facility at 1837 Ponus Ridge Road? If yes, please provide a copy. If no, please provide any data that you have available regarding the physical characteristics of soil and rock at 1837 Ponus Ridge Road and identify the source(s) of that information.

14. What are the size and dimensions of the proposed telecommunications facility compound at 1837 Ponus Ridge Road? Please provide a copy of the most recent site plan.

15. How long is the proposed access drive? How much of it is to be paved?

16. Please provide the distance in feet from the closest points of (a) the compound area; and (b) the access drive to Laurel Reservoir.

17. Will the Town of New Canaan be charged a fee to maintain antennas on the proposed tower at 1837 Ponus Ridge Road? Please provide copies of any written agreements, draft/proposed or effective, with the Town of New Canaan with respect to the proposed tower.

18. Has any analysis been conducted to determine whether coverage objectives can be met by installing antennas on existing infrastructure? If yes, provide and discuss relevant studies.

19. In your response to the Siting Council's interrogatory 16, you state that "AT&T's objective, particularly with respect to FirstNet service, is to maximize the coverage achievable from this site. Any reduction in centerline height would reduce the coverage of the site." Were other tower heights modeled for 1837 Ponus Ridge Road? If so, please provide a coverage plot for each height modeled.

20. Was 982 Oenoke Road in New Canaan considered as a potential location? If so, what heights were modeled for this location? Please provide any coverage plots you prepared for this location.

21. Was 40 Dan's Highway, New Canaan considered as a potential location? If so, what heights were modeled for this location? Please provide any coverage plots you prepared for this location.

22. Other than making inquiry into the Connecticut Department of Environmental Protection Natural Diversity Database, has the applicant conducted any field investigation of whether any Connecticut-listed endangered, threatened or species of special concern may be present at the site or in its vicinity? If yes, please provide any written report of such investigation.


23. Have field inventories and resource characterization been done for any of the wetlands and watercourses resources at 1837 Ponus Ridge Road? If yes, please provide any written report of such investigation.

24. What studies were conducted and what resources did the applicant use to determine that the proposed cellular communications tower would not be located in any known bird concentration areas or known migratory or daily movement flyways?

25. Please provide resumes for (or summaries of the professional qualifications of) Dean Gustafson, Deborah Gustafson, Brian Gaudet, and Michael Libertine.

Respectfully submitted,

PARTY MARK BUSCHMANN, TRUSTEE

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on June 14, 2022.

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David F. Sherwood
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