

MORIARTY, PAETZOLD & SHERWOOD

ATTORNEYS AT LAW

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July 6, 2022

Attorney Melanie Bachman, Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Reference: Connecticut Siting Council Docket No. 509 -Application of Homeland Towers, 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

Dear Attorney Bachman:

Please find enclosed an original and 15 copies of a "Motion to Strike," relating to the above referenced matter.

I also enclosing an original and 15 copies of our responses to the applicants' interrogatories and a supplemental witness list and wish formally to advise you and the Connecticut Siting Council that one of our witnesses, David S. Ziaks, P.E., will be unavailable on July 14, 2022, the date of the public hearing scheduled in this matter, due to a conflicting obligation. Accordingly, we are disclosing an additional witness, Guy Hesketh, P.E., who is available to testify in his place. Mr. Ziaks will be available on August 16, 2022, if the public hearing is continued to that date.

Thank you for your attention to these matters.

Very truly yours,

MORIARTY, PAETZOLD & SHERWOOD



David F. Sherwood

/mds

cc: Service List
Mark Buschmann
Jamie Buschmann

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

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APPLICATION OF HOMELAND
TOWERS, 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

:

DOCKET NO. 509

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:

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JULY 6, 2022

SUPPLEMENTAL WITNESS LIST OF PARTIES MARK BUSCHMANN, TRUSTEE AND
JAMIE BUSCHMANN, TRUSTEE, AND MARK BUSCHMANN, INTERVENOR

Parties Mark Buschmann, Trustee and Jamie Buschmann, Trustee, and Mark Buschmann, intervenor under C.G.S. § 22a-19, intend to offer testimony from the following additional witness relating to the above-referenced application.

1. Guy Hesketh, P.E., F.A. Hesketh & Associates, 3 Creamery Brook, East Granby, CT 06026.

Pre-Filed Testimony: Memorandum dated June 13, 2022 from David S. Ziaks, P.E. to Attorney David Sherwood re Proposed Wireless Telecommunications Facility 1837 Ponus Ridge Road – New Canaan

We reserve the right to offer additional witnesses as may be necessary during the hearing process.

PARTIES MARK BUSCHMANN, TRUSTEE
AND JAMIE BUSCHMANN, TRUSTEE, AND
MARK BUSCHMANN, INTERVENOR

By s/ David F. Sherwood

David F. Sherwood
Moriarty, Paetzold & Sherwood
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dfsherwood@gmail.com
Juris No. 412152
Their Attorneys

CERTIFICATE OF SERVICE

I hereby certify that copies of this supplemental witness list and the pre-filed testimony of the witness listed thereon were electronically mailed to the following service list on July 6, 2022.

Lucia Chiocchio, Esq.
Kristen Motel, Esq.
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
lchiocchio@cuddyfeder.com
kmotel@cuddyfeder.com

Raymond Vergati
Manuel Vicente
Homeland Towers, LLC
9 Harmony Street, 2nd Floor
Danbury, CT 06810
rv@homelandtowers.us
mv@homelandtowers.us

Brian Leyden
Harry Carey
AT&T
84 Deerfield Lane
Meriden, CT 06067
bl5326@att.com
hc3635@att.com

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
kbaldwin@rc.com

Justin Nishioka
60 Squires Lane
New Canaan, CT 06840
Justin.nishioka@gmail.com

s/ David F. Sherwood
David F. Sherwood
Commissioner of the Superior Court

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

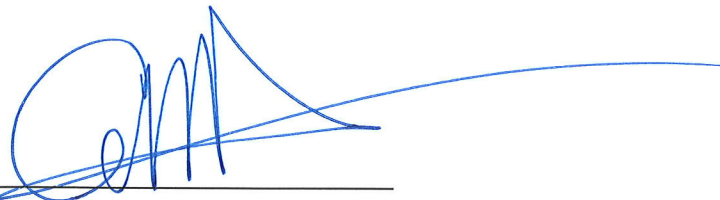
IN RE: :
:
APPLICATION OF HOMELAND TOWERS, : DOCKET NO. 509
LLC FOR A CERTIFICATE OF :
ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR THE CONSTRUCTION, :
MAINTENANCE AND OPERATION OF A :
TELECOMMUNICATIONS FACILITY AT :
1837 PONUS RIDGE ROAD, NEW CANAAN, :
CONNECTICUT :
:
: JULY 5, 2022

AFFIDAVIT OF GUY A. HESKETH, P.E.

I, Guy A. Hesketh, the undersigned, being duly sworn, do depose and say:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. My business address is F.A. Hesketh & Associates, 3 Creamery Brook, East Granby, CT 06026.
3. I have reviewed the attached memorandum from David S. Ziaks to Attorney David F. Sherwood dated June 13, 2022 and relating to the above-captioned matter with my colleague, David S. Ziaks, and have become thoroughly familiar with the memorandum and with the application to which it relates. I concur with Mr. Ziaks' analysis and the facts therein are true and accurate to the best of my knowledge and belief.

Further the deponent sayeth not.




Guy A. Hesketh, P.E.

Subscribed and sworn to before me this 5TH day of July, 2022.

JOANNE MARIE O'NEILL
NOTARY PUBLIC
MY COMMISSION EXPIRES MAR. 31, 2023





Commissioner of the Superior Court
Notary Public
My Commission Expires:

GUY A. HESKETH, P. E.
Chief Engineer
Manager of Civil Design Group
F.A. Hesketh & Associates, Inc.

BACKGROUND

More than 30 years of civil and environmental engineering experience: civil engineering experience with residential and commercial development, and environmental engineering experience with projects ranging from site assessments and investigations to remediation of hazardous waste sites. Experience with subdivision design, site layout and design, stormwater management, on-site sewage disposal and sanitary sewerage. Experience in on-site construction and remediation oversight and management and site environmental investigations.

EDUCATION

Master of Science - Civil and Environmental Engineering
Brigham Young University, Provo, Utah (1988)

Bachelor of Science - Civil Engineering
Brigham Young University, Provo, Utah (1986)

Associate in Engineering - Ricks College, Rexburg, Idaho (1981)

PROFESSIONAL QUALIFICATIONS

Licensed Professional Engineer

- Connecticut 00019394
- Massachusetts 42955
- Rhode Island 7347
- New Hampshire 10376

PROFESSIONAL EXPERIENCE

F. A. Hesketh & Associates, Inc.
East Granby, Connecticut

2003 – Present Chief Engineer

1995 – Present Manager of Civil Design and Planning Group

Responsible for overseeing office design professionals in the planning and design of a wide range of private and public projects, including residential subdivisions, commercial and industrial sites, developments and municipal and state roadway design projects. Assisting clients in preparation of local wetlands and zoning permits, Connecticut Department of Energy & Environmental Protection permits, including Water Discharge Permits and Waste and Materials Management Permits.

General Permits for the Discharge of Stormwater (Industrial, Commercial, and Construction Activities), Analysis and design of stormwater and sanitary sewer systems for residential subdivisions, industrial and commercial site developments, and preparation of construction plans and documents for these projects.

GUY A. HESKETH
(Continued)
(2 of 2)

International Technologies Corporation
Cincinnati, Ohio

1992 – 1995 Project Engineer

Responsible for managing on-site remediation of hazardous waste sites. Responsibilities included: coordinating efforts between the client and federal and local government agencies, analytical laboratories, and remediation contractors. Responsibilities also included remediation oversight, preparation of contract change orders, review of results of laboratory analysis, coordinating sampling efforts, data management, and preparation of reports.

Dames & Moore
Cincinnati, Ohio

1990 – 1992 Project Engineer

Project Engineer responsible for environmental sample collection, preparation of environmental permit applications, remedial design and preparation of bid documents and design drawings and specifications.

Bingham Engineering
Salt Lake City, Utah

1988 – 1990 Junior Staff Engineer

Engineer responsible for performing environmental site audits, geotechnical analysis of soils and wastes, and hydraulic and hydrogeologic computer modeling.

F.A. Hesketh & Associates, Inc.
Bloomfield, Connecticut

1979 – 1986 Survey and Junior Engineer

Junior staff engineer responsible for analysis and design of stormwater management facilities utilizing TR-55 computer modeling, layout and design of residential subdivisions and commercial site developments. Performed site soil analysis relating to the layout and design of on-site sewage disposal systems.

Survey party crew member. Performed boundary and topographic surveys, construction stakeout and generation of base mapping. Performed site soil analysis relating to the layout and design of on-site sewage disposal systems.