

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 APPLICATION OF HOMELAND : DOCKET NO. 509
 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 : JUNE 14, 2022

New Canaan Neighbors First Set of Interrogatories to Applicant

1. Please specify all “wetlands” and “watercourses” that the applicant is referring to when stating that the approximately 40,000 s.f. of vegetative clearing will have “[n]o direct impacts to any wetlands or watercourses” on page 14 of the Application.
2. Please describe in detail the type of fill to be used, how it will be tested, the vendor of the fill, and what percentage of the fill will be tested by the Applicant.
3. Please list all construction equipment and tools that will or could be needed in the construction of the project, including but not limited to, all equipment to be

used for clearing of trees for the access road, constructing the tower, constructing drainage systems, undergrounding, electrical needs, and vehicles.

4. Please specify the place(s) whereby the applicant could feasibly and effectively place a rain garden(s) to capture runoff, as well as the size and slope of the rain garden(s).
5. Please provide all materials and evidence reviewed, reports generated, and criteria applied for the assertion that State of Connecticut property on Reservoir Lane in New Canaan and/or Stamford, Connecticut, was “unavailable or inappropriate for the siting of a tower facility or technically inadequate to satisfy AT&T’s coverage requirements for this area.”
6. What other protection measures are encompassed in the “etc.” in the general comments provided in the Wetland Delineation Field Form provided in Attachment 6 of the Application.
7. Please provide what the steepest grade of slope is on the 1837 Ponus Ridge Road parcel.
8. Please specify in detail what road treatments will be used on the access road during winter and snowy weather conditions.
9. Please state any and all snow and ice removal equipment that will be used on the access road.

10. Please describe the steps the applicant will take to comply with Conn. Gen. Stat. section 22a-32, "Regulated activity permit. Application. Hearing. Waiver of hearing," which provides in pertinent part, "No regulated activity shall be conducted upon any wetland without a permit."
11. Please state the depth to bedrock assessed for all areas subject to clearing and construction.
12. Were any crane tests or CW tests performed? If so, please provide all information, assessments, reports, conclusions, and opinions resulting from these tests. If crane tests or CW tests were not performed, please specify why they were not performed.
13. Please provide all materials reviewed, evidence used, and criteria applied for the assertion, "Applicants submit that there are no equally effective, feasible technological alternatives to a new tower for providing reliable personal wireless services in the northwestern New Canaan area." (Application, page 12)
14. Please provide a thorough itemized breakdown of the costs alleged for small cells and cell transmitters/antenna/repeaters placed on utility poles as discussed in Applicant's response to Question 18 of the CSC interrogatories, as well as a breakdown of anticipated worker hours necessary for installing small cells and cell transmitters/antenna/repeaters on existing utility poles, and all maintenance costs.

15. Please provide all visual impact photos.
16. Town officials have stated that several additional towers are anticipated to be sited in New Canaan, including 2 or 3 more towers in the western part of New Canaan. Please state all other sites being considered by Homeland Towers in New Canaan, as well as provide all information concerning sites that Homeland Towers believes are being considered by the Town of New Canaan.
17. Please state whether the following locations (and the poles/sidewalks near the locations) were considered as potential sites for siting a cell tower, small cell, or cell transmitters/antenna/repeater. All locations listed below are in Connecticut:
 - a. State of Connecticut land on Reservoir Lane in New Canaan and Stamford.
 - b. 45 Trinity Pass Road in Stamford.
 - c. All properties owned by the Town of New Canaan on Main Street in New Canaan.
 - d. 40 Spring Hill Lane in Stamford.
 - e. 50 Spring Hill Lane in Stamford.
 - f. 30 Oenoke Lane in New Canaan.
 - g. All properties owned by the Town of New Canaan on Oenoke Ridge Road in New Canaan.

- h. Cedar Lodge Farm at 175 Ingleside Drive in Stamford.
- i. The utility pole at or near 388 West Road in New Canaan.
- j. All properties owned by Emily Nissley on Oenoke Lane in New Canaan (MBL 204 900 & MBL 204 901).
- k. 1062 Ponus Ridge Road in New Canaan.
- l. All properties owned by the Town of New Canaan on Ponus Ridge Road in New Canaan.
- m. The fire station on High Ridge Road in Stamford for Long Ridge Fire Co. 2 (located at or near 2619 High Ridge Road in Stamford).
- n. All properties owned by the Town of New Canaan on Weed Street in New Canaan, including Irwin Park.
- o. 982 Oenoke Ridge Road in New Canaan.
- p. Any of the utility poles at or near 11 Barnegat Road in New Canaan.
- q. 40 River Wind Road in New Canaan.
- r. All properties owned by the State of Connecticut on Ponus Ridge Road in New Canaan.
- s. 32 Wascussue Court in New Canaan.
- t. All properties owned by the State of Connecticut on Trinity Pass Road in New Canaan and Stamford.
- u. 40 Dan's Highway in New Canaan.

- v. Any of the utility poles located at or near the intersection of West Hills Road and West Road in New Canaan.
 - w. Any of the utility poles located in front of or near Acme Markets located at 288 Elm Street in New Canaan.
 - x. 751 Weed Street in New Canaan.
18. If assessed or reviewed as a potential site, please provide any information, reports, coverage maps, or analyses for all of the locations discussed in Interrogatory 17 above.
19. Please provide all analyses, tests, studies, reports, and assessments of 1837 Ponus Ridge Road that have been conducted following the submission of the Application (on or around April 12, 2022), and any anticipated analyses, tests, studies, reports, and assessments of 1837 Ponus Ridge Road in the future.
20. Please state the names of all renters residing at 1837 Ponus Ridge Road.

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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