

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, : June 23, 2022  
CONNECTICUT :

**SUPPLEMENTAL RESPONSE OF NEW CANAAN NEIGHBORS (“NCN”) TO  
THE CONNECTICUT SITING COUNCIL PRE-HEARING  
INTERROGATORIES, SET ONE**

NCN respectfully requests to amend its interrogatory response to the Connecticut Siting Council’s Interrogatory 7 (submitted on June 20, 2022). Photos taken of the balloon float on April 7, 2021 at 331 Dan’s Highway have been recovered. These supplemental photos are attached hereto as Exhibit 7.

As provided below, NCN amends its previous response to CSC Interrogatory 7 as follows:

**Q7. Did the New Canaan Neighbors take photographs of the balloon test conducted by the Applicant on April 7, 2021? If yes, submit the photographs with descriptive captions.**

A7. The majority of the NCN members did not receive notice of the balloon test conducted on April 7, 2021. For one person in the NCN who happened to see the balloon, photos taken depicted a highly visible balloon float from the property located at 331 Dan's Highway in New Canaan. (See, Exhibit 7, Photos 1 – 11, with descriptions.)

Photos were also taken by the owner of 59 Squires Lane. Windy conditions made it impossible to accurately portray the height and position of the balloon float. Furthermore, the proposed plans for the site would remove virtually all of the trees impeding view of the cell facility from the locations the photos were taken. (See, Exhibit 6, Photos 1 through 6, with descriptions.)

RESPECTFULLY SUBMITTED,

By                     /s/Justin Nishioka                      
Justin Nishioka, NCN Representative

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically mailed to the following service list on June 23, 2022.

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*/s/Justin Nishioka*  
Justin Nishioka, NCN Representative

**NCN EXHIBIT 7, Photos 1 through 11, taken on April 7, 2021.**



PHOTO 1: 331 Dan's Highway- Photo from area west of home at property line. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height. All pictures are "as taken" without filters or adjustments.



PHOTO 2: 331 Dan's Highway- Photo from area west of home at property line. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height. Taken immediately after taking Photo 1.



PHOTO 3: 331 Dan's Highway- Photo from west property line, several yards south of the first two photos. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.



PHOTO 4: 331 Dan's Highway -Photo taken immediately after Photo 3 from west property line, several yards south of the first two photos. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.





PHOTO 5: 331 Dan's Highway- Photo from west property line, several yards south of Photos 3 and 4 . Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height. Despite this, the balloon was clearly visible from many vantage points on the property.



PHOTO 6: 331 Dan's Highway- Photo from west property line, several yards south of Photo 5. The roof of 359 Dan's Highway is visible on the left edge of this photo, showing how the height of the balloon towers above the structure. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.



PHOTO 7: 331 Dan's Highway- Photo taken from the street level at southwest corner of 331 Dan's Highway. Balloon was clearly visible from many vantage points on the street. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.



PHOTO 8: 331 Dan's Highway- Photo taken immediately after Photo 7 from the street level at southwest corner of 331 Dan's Highway. In this picture, balloon has continued to dip lower to the left, but is clearly visible. Balloon was clearly visible from many vantage points on the street.



PHOTO 9: Photo at street level in front of 1837 Ponus. Balloon was clearly visible from many vantage points on the street. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.



PHOTO 10 - Photo taken from street level in front of 1837 Ponus, several yards northwest of Photo 9, looking almost directly up the hill. Balloon was clearly visible from many vantage points on the street. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.



PHOTO 11: Photo at street level in front 1837 Ponus, several yards northwest of Photo 10. Balloon was clearly visible from many vantage points on the street. Windy conditions caused the balloon to sway significantly from a straight line, making it appear substantially lower than its actual height.