



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

June 9, 2022

David F. Sherwood, Esq.  
Moriarty, Paetzold & Sherwood  
2230 Main Street, P.O. Box 1420  
Glastonbury, CT 06033-6620  
[dfsherwood@gmail.com](mailto:dfsherwood@gmail.com)

RE: **DOCKET NO. 509** - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 1837 Ponus Ridge Road, New Canaan, Connecticut.

Dear Attorney Sherwood:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 21, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the June 21, 2022 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

MB/RM/lm

c: Service List dated May 26, 2022

**Docket No. 509**  
**Mark Buschmann**  
**Pre-Hearing Interrogatories**

1. Referring to Mark Buschmann Request for CEPA Intervenor Status, dated May 6, 2022, provide information as to how the Applicant did not properly evaluate the wetlands on the host parcel, including but not limited to, identification and delineation, and wetland characteristics and functions.
2. Provide information as to how the proposed facility will significantly impact avian populations. Identify the specific state-listed species that would be significantly impacted by the proposed facility.
3. Identify and describe Wren Knolls. Is there public access to this feature?
4. What specific areas of Centennial Watershed State Forest would have views of the proposed tower? What analysis was used to determine tower visibility from these areas?
5. Did Mr. Buschmann take photographs of the balloon test conducted by the Applicant on April 7, 2021? If yes, submit the photographs with descriptive captions.
6. What alternatives to the currently proposed location are available to the Applicant that would have less of an impact to the natural resources identified by Mr. Buschmann?