

State of Connecticut Siting Council

DOCKET NO. 488 —

Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for Certificate of Environmental Compatibility and Public Need for construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Assessor ID #M10, Block 22, Lot 28 “Bald Hill Road” or 93 Richards Road, Kent, Connecticut.

: July 2, 2020

INTERROGATORIES TO APPLICANT(S) — SET TWO

The undersigned, on behalf of the Bald Hill Neighbors, as Parties and Intervenors in this matter, hereby propounds the following Interrogatories to the Applicant(s), Homeland Towers LLC and New Cingular Wireless PCS LLC (AT&T). These requests are joint and should be answered by the representative of the Applicant(s) best suited to respond.

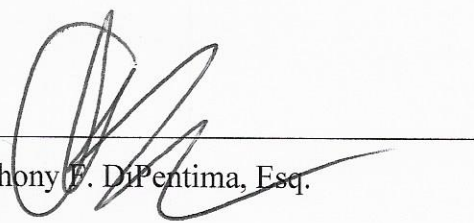
40. Has either Applicant Homeland Towers LLC (“Homeland”) or New Cingular/AT&T (“AT&T”) performed a Site inspection of the Site A property? If so, please disclose what physical on-site inspection was performed on Site A and produce any report from that inspection.
41. Did Applicant Homeland perform an inspection of the Site A property prior to executing its lease of June 13, 2012 (i.e., the lease with former Site A property own John Atwood)? If so, please disclose what physical on-site inspection was performed on Site A, the results of that inspection, and produce any report from that inspection.
42. If the response to either interrogatory 40 or 41 is in the affirmative, please identify all persons, and for whom they were employed, who performed the site inspection.
43. Is either Applicant in possession of any report indicating there are, or there were, areas of environmental concern on the Site A property? If so, please produce such report(s).
44. If the answer to interrogatory 43 is in the affirmative, to whom were the report(s) disclosed?
45. Was a physical, on-site inspection of the Site A property undertaken on the part of the Applicant(s) when Insite Towers Development 2 LLC purchased the property in 2019? If so, please produce any report relating thereto.

46. Was any physical on-site inspection by any interested party, lessee, or lessor prior to the sale of the Site A property in 2019? If so, please produce any report relating thereto.
47. If the answer to interrogatory 45 or 46 is in the affirmative, please identify all persons and for whom they were employed who performed the site inspection(s).
48. Please disclose the relationship to, including any ownership stake, parent-subsiary relationship, or other interest of the Applicant(s) with Insite Wireless Group LLC and Insite Towers Development 2 LLC.
49. Did the Applicant(s) make any inquiry of the Estate of John Atwood (including its Administratrix), or any inquiry of the subsequent purchaser (Insite Towers Development 2 LLC) or partner Insite Wireless Group LLC, as to how any refuse, debris or areas of environmental concern came to exist on the Site A property? If so, please produce such inquiry and the response(s) thereto.
50. Did areas of environmental concern or other environmental conditions play any role in the purchase price or lease or rental price of the Site A property? If so, please produce any report relating thereto.
51. Did the Applicant(s) discuss or request that Insite Towers Development 2 LLC or partner Insite Wireless Group LLC remedy any areas of environmental concern on the Site A property? If so, please produce any written records of such request/discussion and any reply or report related thereto.
52. Has the Applicant submitted its Phase 1 environmental report on the Site A property as requested by the Siting Council?
53. If the answer to interrogatory 52 is in the affirmative, please provide such report, disclose the individual who completed it, and disclose the individual who will be available at-hearing for cross-examination about it.
54. If the answer to interrogatory 52 is in the negative, why not?

- 55. Has the Applicant(s) retained the company that conducted such Phase 1 on the Site A property for other telecommunications facility projects in Connecticut? If so, which projects?
- 56. Please produce the contract whereby the Applicant(s) retained such contractor to perform the Phase 1 on Site A.
- 57. Please produce any photographs or video records, from January 1, 2012 or later, of the Site A property that are within the Applicant(s)' possession, custody or control of the Applicant(s).
- 58. If there are such photographs or videos as described in interrogatory 57, when and by whom were those photographs or videos taken?

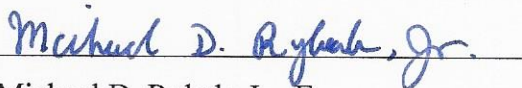
Respectfully Submitted,

The Bald Hill Neighbors.

By  _____
Anthony F. DiPentima, Esq.

July 2, 2020

Date

By  _____
Michael D. Rybak, Jr., Esq.

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Their Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true, original copy, of the foregoing were placed in the U.S. Mail on this 2nd day of July 2020 and addressed to:

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

I further certify that an electronic copy of the foregoing was sent to:

siting.council@ct.gov

And I certify that electronic copies of the foregoing were sent to:

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