STATE OF CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PSC, LLC d/b/a AT&T FOR A CERTIFICATE OF ENVIORNMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION MAINTENANCE, AND OPERATION OF A TELECOMMUNICATIONS FACILITY AT ONE OF TWO SITES IN THE TOWN OF KENT, CONNECTICUT

DOCKET NO.488

July 16, 2020

PLANNED DEVELOPMENT ALLIANCE OF NORTHWEST CONNECTICUT, INC. WITNESS AND EXHIBIT LIST

PDA intends to call the following witnesses and present exhibits as follows:

1. David Maxson, WCP of Isotrope, LLC (pre-filed testimony submitted)

Exhibits: Exhibit A -

Isotrope Coverage Analysis

Figure 1 – Height/Coverage Comparison for Bald Hill

Figure 2 – Height/Coverage Comparison for Richards Road

Figure 3 – Notional Small Cell Network Coverage

Exhibit B - CV/Resume of David Maxson

2. Robert Todd Powell, PDA of NW CT, Inc. (pre-filed testimony submitted)

Exhibits: A, A1, B, C, C1, D, E, F, G (9 photographs of balloon float on July 4, 2020)

- Ex. H Housatonic Valley Association Letter
- Ex. I List of Individuals Filing Letters of Objection
- 3. Paul Elconin, Northwest Connecticut Land Conservancy (f/k/a Weantinoge Heritage Land Trust, Inc.) (pre-filed testimony submitted)
- 4. Connie Manes, Kent Land Trust (pre-filed testimony Ex. A letter submitted)

REQUEST FOR ADMINISTRATIVE NOTICE ITEMS

- 1. CSC Decision and Order Docket #355 (New Milford)
- 2. CSC Decision and Order Docket #347 (New Milford)

- PUBLIC LAW 109–338—OCT. 12, 2006 §272 National Heritage Area Act establishing the Upper Housatonic Valley National Heritage Area https://www.congress.gov/109/plaws/publ338/PLAW-109publ338.pdf
- Upper Housatonic Valley National Heritage Area 2013 Management Plan https://housatonicheritage.org/wp-content/uploads/2019/10/UHVNHA_ManagementPlan_4.15.2014-B-web.pdf

Respectfully Submitted,

Planned Development Alliance of Northwest Connecticut, Inc.,

By_____ Keith R. Ainsworth, Esq. Law Office of Keith R. Ainsworth, Esq., L.L.C. #43269 51 Elm Street, Suite 201 New Haven, CT 06510-2049 (203)435-2014 keithrainsworth@live.com

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 16th day of July, 2020 and addressed to:

Ms. Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig plus 1 electronic) (US Mail/electronic). siting.council@ct.gov

Homeland Tower/AT&T c/o Lucia Ciocchio, Esq.,Cuddy & Feder, LLP, 445 Hamilton Avenue, 14th floor, White Plains, NY 10601 (203) 761-1300, lchiocchio@cuddyfeder.com (electronic and US Mail)

Town of Kent, Intervenor, c/o Daniel E. Casagrande, Esq., Cramer & Anderson, LLP 30 Main Street, Suite 204, Danbury, CT 06810; dcasagrande@crameranderson.com; daniel@rosemark.law

Bald Hill Road Neighbors, Intervenor, c/o Anthony F. DiPentima, Esq., Michael D. Rybak, Jr., Esq., Guion, Stevens & Rybak, LLP, 93 West Street, PO Box 338, Litchfield, CT 06759; afd@litchlaw.com; mdrjr@litchlaw.com

South Spectacle Lakeside Residents, Intervenor, c/o Marleen Donnenfeld <u>marleendonnenfeld@gmail.com</u>

Spectacle Ridge Association, Inc., Intervenor, c/o Matthew Sippel, MSippel@induscap.com

Keith R. Ainsworth, Esq.