

STATE OF CONNECTICUT
SITING COUNCIL

Homeland Towers and
New Cingular Wireless PCS, LLC : DOCKET # 445
Application for a Certificate of Environmental
Compatibility and Public Need for the construction,
Maintenance, and operation of a telecommunications
Facility located at
Old Stagecoach Road, Ridgefield, Connecticut.

: MAY 12, 2014

**SECOND SET OF INTERROGATORIES AND REQUESTS TO PRODUCE TO
APPLICANT**

The following Interrogatories are directed to the Applicant (both AT&T and Homeland Towers as appropriate) by the Intervenor.

1. As the application presents potential impacts to adjacent wetlands, please provide the construction detail for the proposed swale around the side of the compound.
2. Similarly, please produce any soil profile data you or your contractors collected for the area underlying the proposed compound, as well as location of test holes.
3. Did the Applicant's soil scientist or similar site analyst survey the area approximately 100 feet NW of Wetland Flag 1-03 where a Phragmites – Skunk Cabbage community occupies a level area on the slope? If so, what is the soil type in that location?
4. Please provide a copy of the Proposed Drainage Plan (DR-PR) cited on p4 of the Drainage Report.
5. Please provide a copy of Items 2-4 listed at the end of the Drainage Report on p9 Appendix B.
6. Please provide a detail section for the compound surface. Will it be gravel or asphalt, concrete, etc?

7. On Sheet SP3 "Gravel Road Section" there is this reference: "See Notes Sheet N-1". But there is no Sheet N-1 in the application materials filed online. Please provide a copy of the same.

8. Did you delineate or calculate the drainage areas for proposed subwatersheds 4S,6P,8S noted in the wetlands assessment? If so, please provide copies of these drainage areas.

Respectfully Submitted,

Intervenor,

By _____
Keith R. Ainsworth, Esq.
Evans Feldman & Ainsworth, L.L.C. #101240
261 Bradley Street
P.O. Box 1694
New Haven, CT 06507-1694
(203)772-4900
(203)782-1356 fax
krainsworth@EFandA-law.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 12th day of May, 2014 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

New Cingular Wireless PCS, LLC c/o Daniel Laub, Esq, Cuddy & Feder, LLP, 445 Hamilton Avenue, 14th Floor
White Plains, NY 10601 (914) 761-1300 (914) 761-5372 fax
cfisher@cuddyfeder.com
dlaub@cuddyfeder.com

Michele Briggs
AT&T
500 Enterprise Drive
Rocky Hill, CT 06067-3900
michele.g.briggs@cingular.com (all by e-mail)

Ray Vergati
Homeland Towers, LLC
22 Shelter Rock Lane,
Bldg. C
Danbury, CT 06810
rv@homelandtowers.us

Keith R. Ainsworth, Esq.