

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

In Re:

APPLICATION OF SBA TOWERS II, LLC ("SBA") FOR A  
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED FOR THE CONSTRUCTION,  
MAINTENANCE AND OPERATION OF A  
TELECOMMUNICATIONS FACILITY AT ONE OF TWO  
ALTERNATE SITES AT RABBIT HILL ROAD IN  
WARREN, CONNECTICUT

DOCKET: 378

April 20, 2009

**RESPONSE TO SBA OBJECTION TO CROWW**  
**REQUEST FOR PARTY STATUS**

On April 14, 2009, the applicant SBA Towers II LLC submitted an objection to the request for party status filed by Concerned Residents of Warren and Washington ("CROWW") dated April 7, 2009.

SBA's objection is legally unsound and invalid and should be rejected.

CROWW is a domestic non-profit association formed in part to promote conservation and natural beauty and therefore has an absolute statutory right to party status in this proceeding under the express provisions of Connecticut General Statutes §16-50n(a)(3).

Respectfully submitted,



Gabriel North Seymour  
Gabriel North Seymour P.C.  
Counsel to CROWW  
200 Route 126  
Falls Village, CT 06031  
Tel: 860-824-1412  
Fax: 860-824-1210  
Email: certiorari@earthlink.net

**RECEIVED**  
APR 21 2009  
CONNECTICUT  
SITING COUNCIL

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, an original and fifteen copies of the foregoing Response to SBA Objection to CROWW Request for Party Status was served on the Connecticut Siting Council by first class mail and copy of same was sent postage prepaid to:

Carrie L. Larson, Esq.  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 06103-3702

Christopher B. Fisher, Esq.  
Cuddy & Feder LLP  
445 Hamilton Avenue, 14th Floor  
White Plains, NY 10601


Kenneth Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597

Hon. Mark E. Lyon  
First Selectman  
Bryan Memorial Town Hall  
P.O. Box 383  
Washington Depot, CT 06794

Hon. Jack Travers  
First Selectman  
Warren Town Hall  
7 Sackett Hill Road  
Warren, CT 06754

Ray and Mary Ellen Furse  
26 Jack Corner Road  
Warren, CT 06777

Hon. F. Philip Prelli, Commissioner  
Department of Agriculture  
165 Capitol Avenue  
Hartford, CT 06106

  
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Gabriel N. Seymour  
Counsel to CROWW

Dated: April 20, 2009