

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

ARX WIRELESS INFRASTRUCTURE LLC
APPLICATION FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE, AND OPERATION OF A
TELECOMMUNICATIONS FACILITY LOCATED
AT 1061-1063 BOSTON POST ROAD IN THE
CITY OF MILFORD, CONNECTICUT

DOCKET NO. 500

Date: JULY 20, 2021

**SUPPLEMENTAL PRE-FILED TESTIMONY OF
KEITH COPPINS, DOUGLAS ROBERTS AND BRIAN GAUDET**

Q1. Based on the questions posed by the Connecticut Siting Council staff at the hearing on June 15, 2021, did you evaluate whether you could relocate the proposed tower on the site to move it into the ICD Zone?

A1. Yes.

Q2. What was the result of your evaluation?

A2. We determined that we could relocate the tower on the site entirely onto the portion of the property zoned ICD. We spoke with the owner of the site and confirmed that he would agree to the new location for the tower. We also prepared updated project plans that depict this alternate design for the site, which we have filed as Exhibit 41 in response to the Siting Council's Interrogatories – Set Two. Exhibit 41 contains a line denoted as "zone change" which marks the boundary between the ICD and R-12.5 zoned sections of the

property. As shown on Exhibit 41, the tower would be located entirely within the ICD zoned portion of the property (the "Alternate Site").

Q3. Does the Alternate Site design increase the distance from the tower to the nearest residence?

A3. Yes. The Alternate Site design (See Exhibit 40 in response to the Siting Council's Interrogatories – Set Two) increases the distance from the tower to the nearest residence from ±170 feet (as depicted on SK-2 of Exhibit 39) to ±275 feet (as depicted on SK-2 of Exhibit 40).

Q4. Will the Alternate Site design require the removal of any trees?

A4. Yes. In order to locate the tower in the area identified in Exhibits 40 and 41, we would need to remove one tree that is approximately 50' high and is currently situated in the ICD zoned section of the property.

Q5. Have you performed a visual assessment based on the tower being located in the Alternate Site?

A5. Yes. We have attached to this testimony Photographic Documentation & Simulations dated July, 2021, prepared by All-Points Technology Corporation, identifying the visual impact of the tower if it is constructed in the Alternate Site.

Q6. What are the visual impacts of the tower being located in the Alternate Site as compared to the original location?

A6. The Alternate Site and original location will share similar overall viewshed and visibility characteristics. The proposed Alternate Site is approximately 105' west/northwest of the original proposed Facility location and shares roughly the same ground elevation above mean sea level. On July 15, 2021, APT conducted a balloon float from a location approximately 22' northwest of the proposed Alternate Site (it was not possible to float a balloon at the exact location due to an existing tree). See Photographic Documentation & Simulations dated July, 2021 attached hereto. The field reconnaissance confirmed that year-round views would occur from roughly the same locations as the photos taken in December 2020 as depicted in Attachment H of the Application. However, siting the tower at the Alternate Site would reduce visibility at the southeastern extent of Home Acres Avenue. Overall, views of the Alternate Site would be similar to those of the currently proposed Facility.

Q7. Will there be additional costs if the tower is constructed in the Alternate Site?

A7. Yes. If the tower is constructed in the Alternate Site, we will not be able to use a "pad and pier" foundation. Instead, construction in this location would require a "caisson" foundation, which requires more concrete and added cost. In addition, as noted above, we would need to remove a 50' tree in order to construct the

tower in this location. The total additional costs for ARX to construct the tower in the Alternate Site would be approximately \$70,000.

Q8. Are you willing to construct the tower in the Alternate Site if ordered by the Siting Council?

A8. Yes. Notwithstanding the additional costs, we are willing to construct the tower in the Alternate Site, recognizing the benefits of moving the tower approximately 105 feet further away from the residents on Home Acres Avenue and the reduced visibility of the tower to those residents.

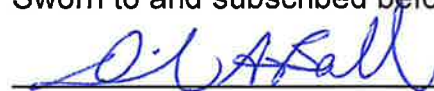
Q9. Does this conclude your testimony?

A9. Yes.

I hereby affirm that the foregoing is true and correct to the best of my knowledge.


Keith Coppins

Sworn to and subscribed before me this 20th day of July, 2021.


Commissioner of the Superior Court

I hereby affirm that the foregoing is true and correct to the best of my knowledge.



Douglas Roberts

Sworn to and subscribed before me this 20 day of July, 2021.



Notary Public
Commission expires:

DAVIANNE NAPIERKOWSKI
NOTARY PUBLIC
State of Connecticut
My Commission Expires 12/31/2023

I hereby affirm that the foregoing is true and correct to the best of my knowledge.

Brian Gaudet

Sworn to and subscribed before me this ____ day of July, 2021.

Notary Public
Commission expires:

I hereby affirm that the foregoing is true and correct to the best of my knowledge.

Brian Gaudet

Brian Gaudet

Sworn to and subscribed before me this th20 day of July, 2021.

Thomas M. Redding Notary
~~Commissioner of the Superior Court~~ Public



Photographic Documentation & Simulations

CT0030 MILFORD
1063 BOSTON POST ROAD
MILFORD, CT

Prepared in July 2021 by:
All-Points Technology Corporation, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

Prepared for ARX Wireless



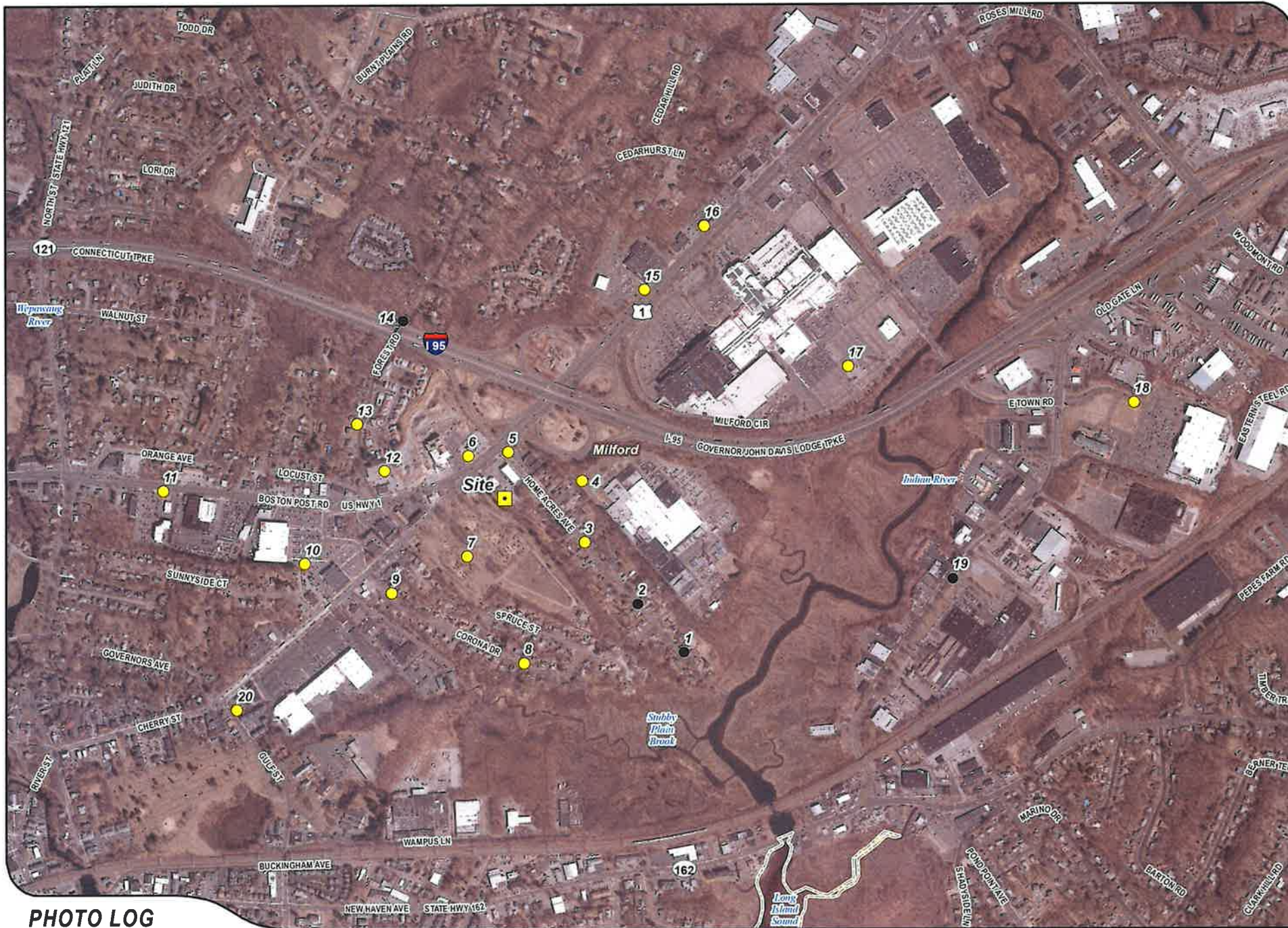
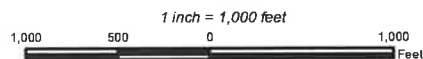


PHOTO LOG

Legend

- Site
- Visible
- Not Visible
- Municipal Boundary





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	HOME ACRES AVENUE	NORTHWEST	+/- 0.35 MILE	NOT VISIBLE





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	HOME ACRES AVENUE	NORTHWEST	+/- 0.26 MILE	NOT VISIBLE





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	HOME ACRES AVENUE	NORTHWEST	+/- 0.14 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	HOME ACRES AVENUE	NORTHWEST	+/- 0.14 MILE	VISIBLE





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	LEIGHTON ROAD	SOUTHWEST	+/- 0.12 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	LEIGHTON ROAD	SOUTHWEST	+/- 0.12 MILE	VISIBLE





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	HOME ACRES AVENUE	SOUTH	+/- 337 FEET	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	HOME ACRES AVENUE	SOUTH	+/- 337 FEET	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	ATHENIAN DINER III PARKING LOT - 1064 BOSTON POST ROAD	SOUTHEAST	+/- 430 FEET	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	ATHENIAN DINER III PARKING LOT - 1064 BOSTON POST ROAD	SOUTHEAST	+/- 430 FEET	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	KING'S HIGHWAY CEMETERY	NORTHEAST	+/- 0.10 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	KING'S HIGHWAY CEMETERY	NORTHEAST	+/- 0.10 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO 8	LOCATION CORONA DRIVE	ORIENTATION NORTH	DISTANCE TO SITE +/- 0.25 MILE	VISIBILITY VISIBLE
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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	CORONA DRIVE	NORTH	+/- 0.25 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	CORONA DRIVE	NORTHEAST	+/- 0.23 MILE	VISIBLE



PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	CORONA DRIVE	NORTHEAST	+/- 0.23 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	CORONA DRIVE	NORTHEAST	+/- 0.32 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
10	CORONA DRIVE	NORTHEAST	+/- 0.32 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
11	BOSTON POST ROAD	EAST	+/- 0.51 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
11	BOSTON POST ROAD	EAST	+/- 0.51 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	FOREST ROAD	SOUTHEAST	+/- 0.18 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	FOREST ROAD	SOUTHEAST	+/- 0.18 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
13	FOREST ROAD	SOUTHEAST	+/- 0.25 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
13	FOREST ROAD	SOUTHEAST	+/- 0.25 MILE	VISIBLE





PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO 14	LOCATION FOREST ROAD	ORIENTATION SOUTHEAST	DISTANCE TO SITE +/- 0.31 MILE	VISIBILITY NOT VISIBLE
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PHOTOGRAPHED ON 11/15/2011

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
15	BOSTON POST ROAD	SOUTHEAST	+/- 0.38 MILE	VISIBLE



PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
15	BOSTON POST ROAD	SOUTHEAST	+/- 0.38 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO 16	LOCATION BOSTON POST ROAD	ORIENTATION SOUTHWEST	DISTANCE TO SITE +/- 0.53 MILE	VISIBILITY YEAR ROUND
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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
16	BOSTON POST ROAD	SOUTHWEST	+/- 0.53 MILE	YEAR ROUND



PHOTOGRAPHED ON 7/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	CONNECTICUT POST MALL	SOUTHWEST	+/- 0.56 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	CONNECTICUT POST MALL	SOUTHWEST	+/- 0.56 MILE	VISIBLE



PHOTOGRAPHED 07/15/2021

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
18	ENTRANCE TO HILTON GARDEN INN - 291 OLD GATE LANE	WEST	+/- 0.94 MILE	VISIBLE





PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
18	ENTRANCE TO HILTON GARDEN INN - 291 OLD GATE LANE	WEST	+/- 0.94 MILE	VISIBLE



PHOTOGRAPHED ON 7/15/2011

EXISTING

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
19	THE EDGE FITNESS CLUB PARKING LOT - 125 OLD GATE LANE	WEST	+/- 0.70 MILE	NOT VISIBLE





PHOTOGRAPH BY ON 7/15/2021

EXISTING

PHOTO 20	LOCATION GULF STREET	ORIENTATION NORTHEAST	DISTANCE TO SITE +/- 0.54 MILE	VISIBILITY VISIBLE
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PROPOSED

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
20	GULF STREET	NORTHEAST	+/- 0.54 MILE	VISIBLE

