

DAVID A. BALL

Please Reply To Bridgeport E-Mail: dball@cohenandwolf.com

August 2, 2022

#### Via e-mail and Hand Delivery

Attorney Melanie Bachman Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re: Docket No. 510 – New Cingular Wireless PCS, LLC d/b/a AT&T and Tarpon Towers II, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at 92 Greens Farms Road, Westport, Connecticut

New Cingular Wireless PCS, LLC d/b/a AT&T and Tarpon Towers II, LLC Pre-Filed Testimony and Pre-Hearing Submission

Dear Attorney Bachman:

On behalf of the applicants, I've enclosed an original and fifteen (15) copies of the following:

- o Pre-Filed Testimony of Keith Coppins
- o Pre-Hearing Submission
- o Attachment to Pre-Hearing Submission

Thank you.

Very truly yours,

David A. Ball

cc: Service List

# STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

DOCKET NO. 510

NEW CINGULAR WIRELESS PCS, LLC D/B/A
AT&T AND TARPON TOWERS II, LLC
APPLICATION FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE AND OPERATION OF A
TELECOMMUNICATIONS FACILITY
LOCATED AT 92 GREENS FARMS ROAD,
WESTPORT, CONNECTICUT

August 2, 2022

### NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T AND TARPON TOWERS II, LLC PRE-HEARING SUBMISSION

Applicants New Cingular Wireless PCS, LLC d/b/a AT&T and Tarpon Towers II, LLC respectfully submit this pre-hearing information regarding the above-referenced Application.

#### A. List of Witnesses

- Martin Lavin, Radio Frequency Engineer, C Squared Systems, LLC, on behalf of AT&T
- 2. David Walsh, Program Manager, Smart Link Group
- 3. Harry Carey, Director, External Affairs, AT&T
- 4. Keith Coppins, CEO of ARX Wireless Infrastructure LLC, on behalf of Tarpon Towers, II, LLC
- 5. Douglas Roberts, on behalf of Tarpon Towers, II, LLC
- 6. Brian Gaudet, Project Manager, All-Points Technology Corporation
- 7. Dean Gustafson, Senior Wetland Scientist, All-Points Technology Corporation

#### B. Exhibits to be Offered

- 1. Application for a Certificate of Environmental Compatibility and Public Need dated May 26, 2022, including Exhibits A through T to the Application
- 2. Bulk Filing exhibits, including:
  - Town of Westport Zoning Regulations and Subdivision Regulations as supplemented and amended
  - b. Town of Westport 2017 Plan of Conservation and Development
  - c. Town of Westport Wetlands and Watercourses Regulations dated August9, 2004
  - d. Technical Report dated August 30, 2021
- 3. Affidavit of Publication of the Legal Notice published in the Westport News on May 13, 2022 and May 20, 2022
- 4. Sign Posting Affidavit dated July 27, 2022
- 5. Pre-Filed Testimony of Keith Coppins
- Applicants' Responses to Connecticut Siting Council Pre-Hearing Interrogatories dated August 1, 2022
- 7. Applicants' Responses to Town of Westport Pre-Hearing Interrogatories dated August 1, 2022

#### C. Exhibits to be Administratively Noticed

 State of Connecticut Siting Council, DOCKET NO. 488 - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut. The applicants reserve the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as may be necessary during the course of the hearing.

#### D. Remote Public Comment Session Presentation

Keith Coppins and Douglas Roberts are the designated presenters for the 6:30 p.m. remote public comment session.

The presentation drawings include the Site Project Plans attached to the Application as Exhibit G and last revised May 3, 2022, Sheets T-001, C-1, C-2, C-101, C-102, and C-103. Electronic copies of plan sheets T-001, C-1, C-2, C-101, C-102, and C-103 are attached to this filing.

#### RESPECTFULLY SUBMITTED,

#### TARPON TOWERS II, LLC

**NEW CINGULAR WIRELESS PCS, LLC** 

David A. Ball, Esq.

Philip C. Pires, Esq.

Cohen and Wolf, P.C.

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Juris No. 010032

Lucia Chiocchio, Esq.

Kristen Motel, Esq.

Cuddy & Feder LLP

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White Plains, NY 10601 Tel. No. (914) 761-1300

E-Mail: lchiocchio@cuddyfeder.com

E-Mail: kmotel@cuddyfeder.com

Juris No. 434865

#### **CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing was sent via electronic mail on this 2<sup>nd</sup> day of August, 2022, to the following:

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Nicholas R. Bamonte, Esq.
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nbamonte@berchemmoses.com

Lucia Chiocchio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
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White Plains, NY 10601
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<a href="mailto:kmotel@cuddyfeder.com">kmotel@cuddyfeder.com</a>

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103 Tel: (860) 275-8200 kbaldwin@rc.com

Donald L. Bergmann 32 Sherwood Drive Westport, CT 06880 donlbergmann@sbcglobal.net

David A. Ball



# WIRELESS COMMUNICATIONS FACILITY CT1024A WESTPORT

# 92 GREENS FARMS ROAD WESTPORT, CONNECTICUT

SHEET NUMBER

T - 001

C - 1

C - 2

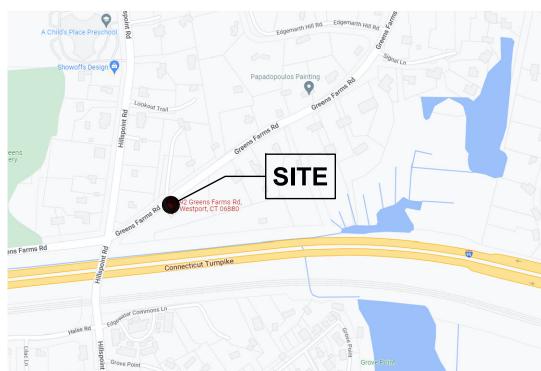
C - 101

C - 102

C - 103

SCOPE OF WORK

# VICINITY MAP



A Child's Place Preschool  Showoffs Design   Lookout Trail  Partitions  Partit	Papadopoulos Painting  Greens farms Rd  Greens Rd  CT 06880
ens Farms Rd  A Connecticut To September Commons Ln  Edder Commons	

CODE REFERENCES

2018 Connecticut State Building

Buildings & Facilities

2015 International Building Code

2015 International Plumbing Code

2015 International Mechanical Code

2015 International Residential Code

2015 International Existing Building Code

2017 National Electrical Code (NFPA 70) 2009 ICC A117.1 Accessible and Usable

2015 International Energy Conservation Code

	CDVD 811
	CBYD.com
2	Call Before You Dig, Inc.

	PROJECT	SUMMARY
-		

CT1024A WESTPORT PROJECT NAME: SITE ADDRESS: 92 GREENS FARMS ROAD

PARCEL ID: E06/ / 074/000 /

PROPERTY OWNER: MEHESH PRADIV & SHARUNA MOOLA

> 92 GREENS FARMS ROAD WESTPORT, CONNECTICUT

WESTPORT, CONNECTICUT

ARX WIRELESS CONTACT: KEITH COPPINS

110 WASHINGTON AVENUE FOURTH FLOOR NORTH HAVEN, CT 06473

203.623.3287

LANDLORD CONTACT: PRADIV MAHESH & SHARUNA MOOLA-MAHESH

92 GREEN FARMS ROAD WESTPORT, CT 06610

ARCHITECT: DOUGLAS J. ROBERTS - ARCHITECT

> 110 WASHINGTON AVENUE FOURTH FLOOR NORTH HAVEN, CT 06473

SURVEYOR NORTHEAST SURVEY CONSULTANTS

**3 FERRY STREET** STUDIO 1 EAST

EASTHAMPTON, MA 01027

LATITUDE: N 41° - 07' - 25.39" LONGITUDE: W 73° - 20' - 41.26"

GRADE (PROPOSED) 19'-0" +/- AMSL

1. NEW 35' x 64' FENCED COMPOUND, 35' x 64' LEASE AREA ON EXISTING PARCEL OF LAND. INSTALL NEW 124' MONOPOLE AND FOUNDATION.

> NEW POWER AND TELCO SERVICES WILL BE ROUTED UNDERGROUND FROM THE EXISTING UTILITY POLE TO THE PROPOSED ELECTRICAL METER CENTER AND HOFFMAN BOX ON PROPOSED H-FRAME. FINAL UTILITY ROUTING TO BE DETERMINED/VERIFIED BY UTILITY COMPANIES.

**SHEET INDEX** 

TITLE SHEET

ABUTTERS PLAN

**EXISTING CONDITIONS PLAN** 

SITE PLAN

SITE DETAILS

**COMPOUND PLAN AND ELEVATION** 

ARX WIRELESS IS PROPOSING TO INSTALL THE FOLLOWING IMPROVEMENTS ON PROPOSED TELECOMMUNICATION SITE:

AT&T EQUIPMENT CABINETS WITH GENERATOR ON 13'x8' CONCRETE PAD, TWELVE (12) AT&T ANTENNAS, AND TWELVE (12) RRHs WITH ASSOCIATED CABLING AND APPURTENANCES. VERIZON EQUIPMENT ON 9'-4"x16' STEEL PLATFORM TWELVE (12) VERIZON ANTENNAS, SIX (6) RADIOS (RRH) WITH ASSOCIATED CABLING AND APPURTENANCES.

# COUNCIL CONNECTIC

# **WESTPORT**

92 GREENS FARMS ROAD WESTPORT, CT

Prepared For:

# **TARPON TOWERS II**

8916 77TH TERRACE EAST LAKEWOOD RANCH, FL 34202

Project No. 2021.12

**DOUGLAS J. ROBERTS - ARCHITECT** 

Fourth Floor North Haven, CT 06473

Email: droberts - architect@outlook.com



CURRENT REVISION | CURRENT REVISION DATE

05/03/2022

03/09/2022

03/09/2022

05/03/2022

05/03/2022

05/03/2022

Do not scale dimensions from drawings Site verify all dimensions prior to construction Report all discrepancies to Architect immediately This drawing is to be read in conjunction with all relevant

**REVISION SCHEDULE** 

REVISION	DESCRIPTION	DATE
0	REVIEW	03/09/2022
1	FINAL	05/03/2022

Kimberly A. Molitierno Drawing Date: February 25, 2022 Niddrie Rowe

2021.12

AS SHOWN

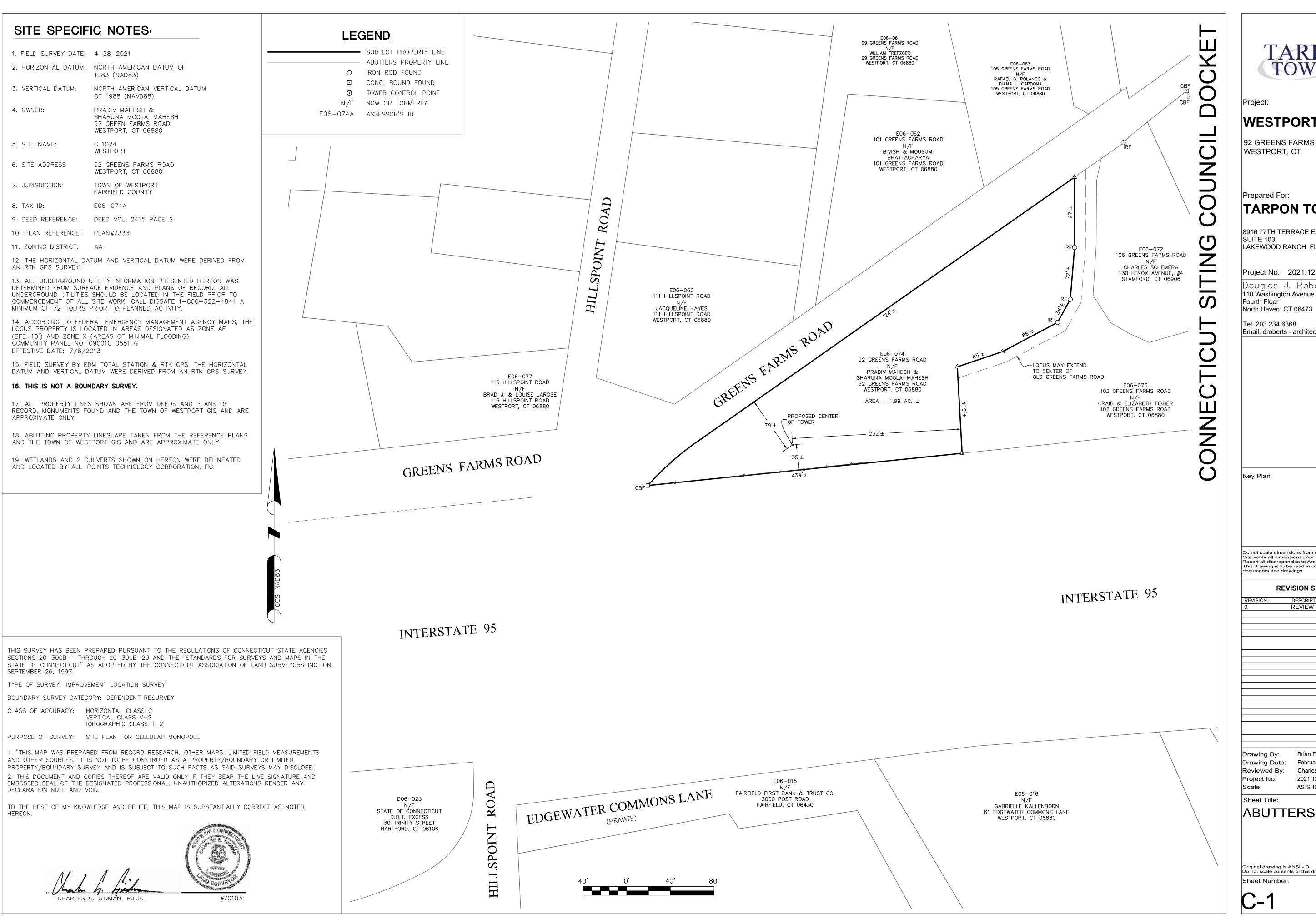
Revision:

Scale: Sheet Title:

Project No:

TITLE SHEET

Original drawing is ANSI - D. Sheet Number:





## **WESTPORT**

92 GREENS FARMS ROAD WESTPORT, CT

Prepared For:

# TARPON TOWERS II

8916 77TH TERRACE EAST SUITE 103 LAKEWOOD RANCH, FL 34202

Project No: 2021.12

Douglas J. Roberts- Architect 110 Washington Avenue

Tel: 203.234.6368

Email: droberts - architect@outlook.com

Do not scale dimensions from drawings Site verify all dimensions prior to construction Report all discrepancies to Architect immediately This drawing is to be read in conjunction with all relevant documents and drawings

## **REVISION SCHEDULE**

DESCRIPTION

REVIEW 03/09/2022

Drawing By: Drawing Date:

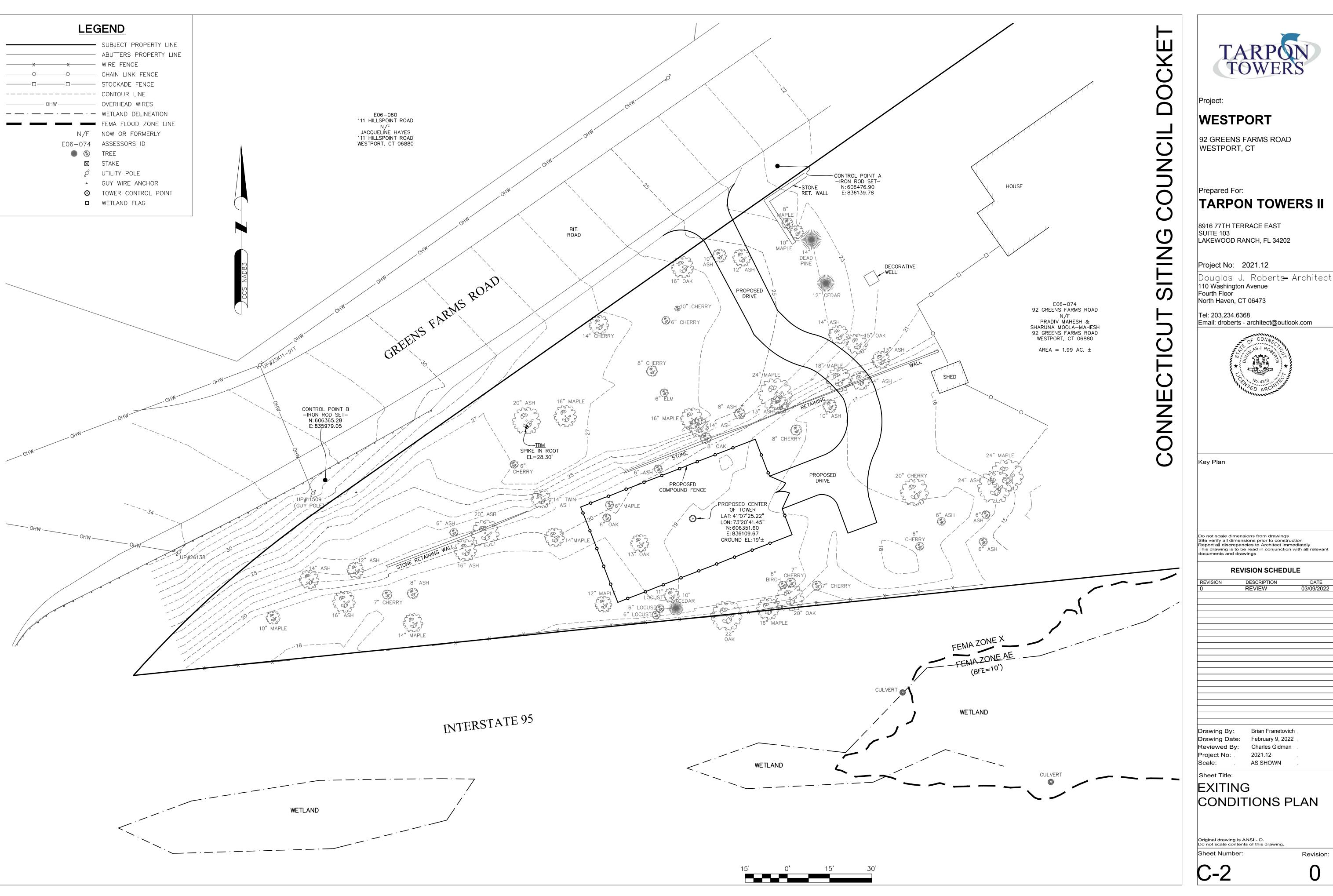
Brian Franetovich February 9, 2022 Charles Gidman 2021.12 AS SHOWN

ABUTTERS PLAN

Original drawing is ANSI - D.

Do not scale contents of this drawing.

Revision:





# **TARPON TOWERS II**

Email: droberts - architect@outlook.com



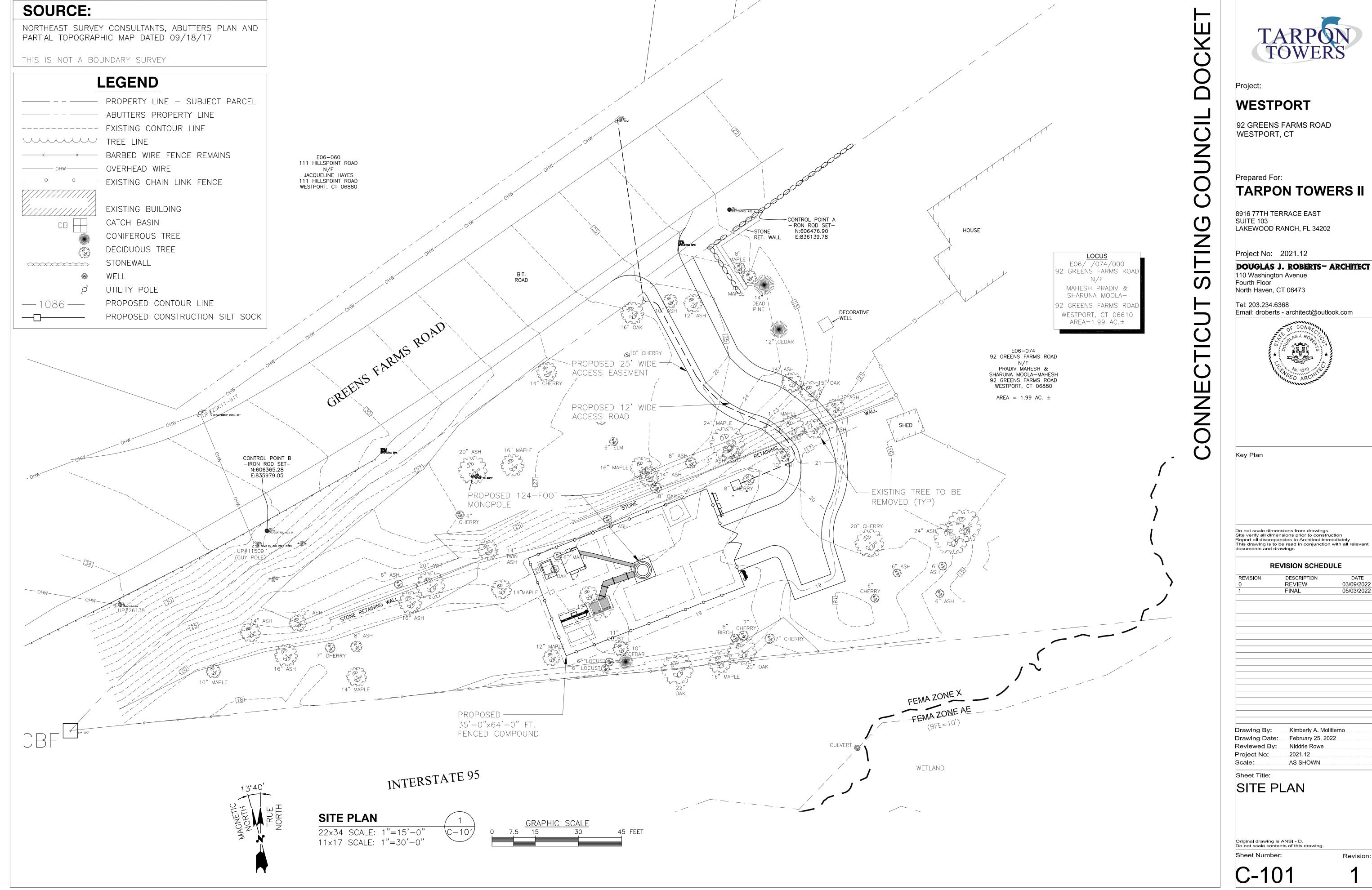
**REVISION SCHEDULE** 

03/09/2022

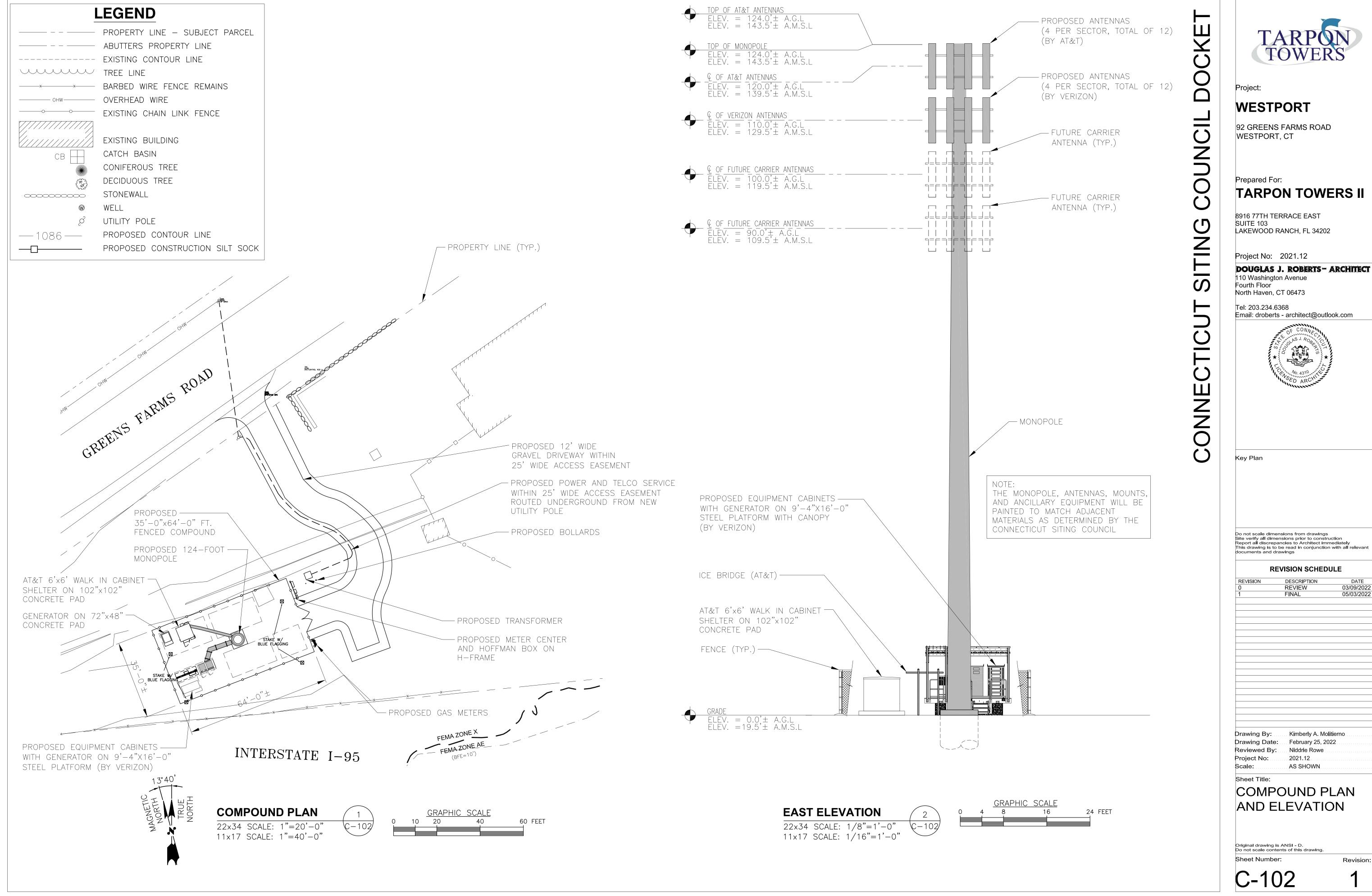
February 9, 2022 Charles Gidman

CONDITIONS PLAN

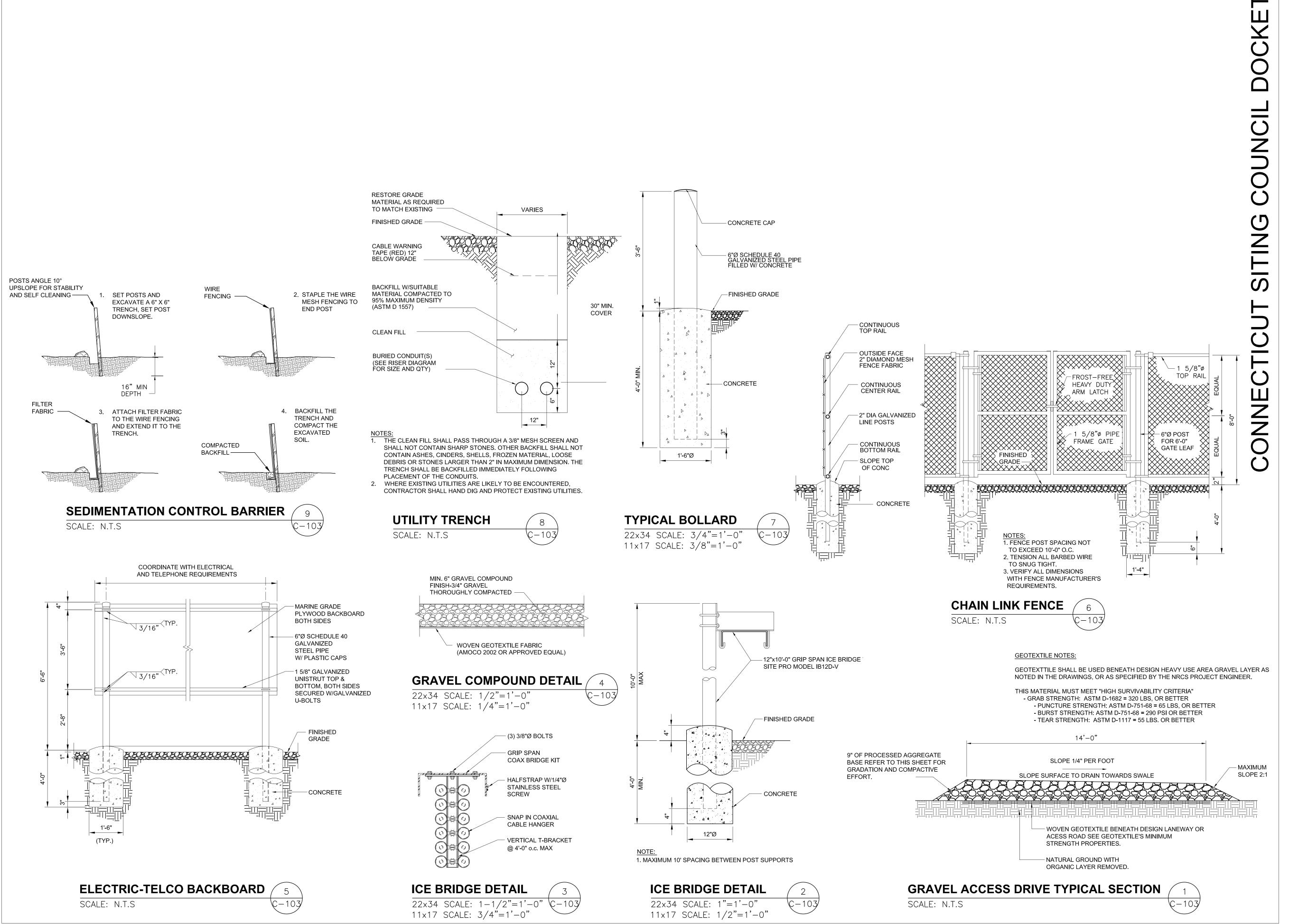
Revision:



SION	DESCRIPTION	DATE
	REVIEW	03/09/2022
	FINAL	05/03/2022



ON	DESCRIPTION	DATE
	REVIEW	03/09/2022
	FINAL	05/03/2022





Proje

# **WESTPORT**

92 GREENS FARMS ROAD WESTPORT, CT

Prepared For:

# **TARPON TOWERS II**

8916 77TH TERRACE EAST SUITE 103 LAKEWOOD RANCH, FL 34202

Project No. 2021.12

**DOUGLAS J. ROBERTS - ARCHITECT**110 Washington Avenue

Fourth Floor North Haven, CT 06473

Tel: 203.234.6368

Email: droberts - architect@outlook.com



Key Plan

Do not scale dimensions from drawings Site verify all dimensions prior to construction Report all discrepancies to Architect immediately This drawing is to be read in conjunction with all relevant

REVISION SCHEDULE

VISION	DESCRIPTION	DATE
	REVIEW	03/09/2022
	FINAL	05/03/2022

Drawing By: Kimberly A. Molitierno

Drawing Date: February 25, 2022
Reviewed By: Niddrie Rowe
Project No: 2021.12
Scale: AS SHOWN

Sheet Title:

SITE DETAILS

Original drawing is ANSI - D.

Sheet Number:

Revision:

C-103