

**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

**PRE-FILED TESTIMONY OF KEITH COPPINS**

**Q1. Mr. Coppins, please summarize your professional background in the telecommunications industry.**

A1. I am a representative of Tarpon Towers II, LLC ("Tarpon"), a co-applicant in this proceeding. I am also the founder and CEO of ARX Wireless Infrastructure LLC. I have been part of the telecommunications industry for thirty years with a primary focus on property development, lease contract negotiations, and construction of newly-approved towers. I have successfully completed all aspects of development activities for more than 450 sites in Connecticut, Massachusetts, Rhode Island and New York. I personally handled or directly managed the leasing, zoning and construction of every site. I also coordinate with wireless carriers to address their coverage needs and determine their interest in occupying each location.

In addition, I am the principal/owner of Phoenix Partnership LLC, a telecommunications site development company. I was formerly the Vice President of Development at Optasite where I led a development team in the Northeast Region telecommunications development and site acquisition activities. I joined Optasite from Site Acquisitions, Inc. where I was Vice-President and oversaw the leasing, zoning and construction of new tower sites. I also managed a consulting team for AT&T Wireless and T-Mobile.

Previously, I was also General Manager for American Tower Corporation and managed a consulting group for Cellular One and Southern New England Telephone. My primary responsibilities were site acquisitions, lease negotiations and zoning of new cellular sites in the New England and New York markets.

**Q2. What is the purpose of your testimony?**

A2. My testimony provides background information relating to this Application for a Certificate of Environmental Compatibility and Public Need (“Application”) for the proposed facility (“Facility”) at 92 Greens Farms Road, Westport, Connecticut (the “Site”).

**Q3. What was your role in this Application?**

A3. I was responsible for Tarpon’s site search, site acquisition, coordination with the landowner, and communication with the wireless carriers for this Application.

**Q4. Please describe your site search process for the Facility.**

A4. As detailed in Exhibit F to the Application, before concluding that the Site at 92 Greens Farms Road was the best location to meet the carrier's needs, we affirmatively reached out to the owners of nine (9) other properties in the area. In some instances, such as the locations at 300 Sherwood Island Connector and 200 Nyala Farms, the properties were not suitable to meet AT&T's coverage needs. In other instances, property owners indicated that they were not interested in having a tower on their property, such as the locations at Corporation of the Catholic Church Assumption Cemetery and 197 Compo Rd South (CL&P). The property owners at 102 Greens Farms Rd (next door to the proposed Site) did show interest in having a tower on their property, but sought lease payment terms that Tarpon was unable to meet.

**Q5. Describe the municipal consultation process. Did the Town of Westport ("Town") suggest any particular locations as potential alternatives for the proposed Facility?**

A5. The municipal consultation period lasted for more than eight (8) months, as Tarpon worked collaboratively with the Town to evaluate other potential locations for a tower, since the Town had expressed opposition to the proposed Site. Tarpon devoted an enormous amount of time considering every location that the Town suggested, and only when it was clear that none of these locations were viable alternatives did Tarpon file the Application for the proposed Site.

The primary alternate property suggested by the Town was located at 55 Greens Farms Road, the location of a large commercial office park. Tarpon representatives spent months in discussions with the property owner and the Town to identify potential locations in the office park for a tower. However, the only viable location on this property would have resulted in significant wetlands impacts (including, but not limited to, the filling of wetlands to construct an access road), and the Town's Conservation Commission convened site inspections and special meetings at which its members and numerous residents expressed opposition to the location. Accordingly, on February 2, 2022, in part due to neighborhood opposition, the owner of 55 Greens Farms Road advised Tarpon that it was not interested in continuing lease negotiations and that it was no longer interested in having a cell tower on the property.

The Town also raised the possibility of siting the tower on State of Connecticut Department of Transportation ("CDOT") property located at Hales Road. As detailed in Exhibit F to the Application, Tarpon representatives spent many weeks trying to get the attention of CDOT representatives, but nearly all of Tarpon's e-mails were ignored by CDOT. After months of Tarpon trying to meet with CDOT (to no avail), on May 5, 2022, CDOT communicated that it did not have the resources to begin the process of licensing its land for a cell tower, and that it had other projects that were of greater priority. Accordingly, it was clear by that time that the CDOT property was not a viable option, leaving the Applicants with no choice but to move forward with the Application at the proposed Site.

Tarpon is confident that it explored every potential alternative site, including locations that it identified and locations suggested by the Town. The municipal consultation period for this project was as collaborative a process as any that I have been involved in, in my 30 years in this industry.

**Q6. Is the proposed Site an appropriate site for the siting of the Facility?**

A6. Yes. While the Town has raised concerns about the location of the Site being in a residential zone, the property itself is extremely well-suited for a tower. The property slopes downward from Greens Farms Road towards I-95. The location of the tower would be set back off the street, and as detailed in the All-Points Visual Assessment (attached as Exhibit H to the Application), the primary visibility of the tower will be along the I-95/Greens Farms Road/Metro North transportation/utility corridor as well as areas to the south over open water and tidal marshland. Furthermore, as set forth in the Application, there will be no significant environmental impact caused by siting the tower at the Site.

**Q7. Should the fact that the proposed Site is located in a residential zone be the basis to deny this application?**

A7. No. Connecticut's statutes governing the siting of telecommunications facilities contain no prohibition on siting towers in residential zones. To the contrary, the statutes require the Council to balance a multitude of factors, including the need for enhanced wireless service in this area. Moreover, while the Town opposes the Site primarily because of its location, the Town's local land use ordinances contain no prohibition on locating a telecommunications tower in a residential

zone, as the Applicants detailed extensively in Section VII(c) of the Application Narrative.

After completing the exhaustive site search as set forth in the Application, I am confident that 92 Greens Farms Road is an appropriate location for the tower, and the only viable option to meet the carriers' coverage and service objectives in this area.


**Q8. Does this conclude your testimony?**

A8. Yes.

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

  
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Keith Coppins

Sworn to and subscribed before me this 29<sup>th</sup> day of July, 2022.

  
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Commissioner of the Superior Court  
DAVID A. BALL

## 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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