

KENNETH C. BALDWIN

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts
and New York

June 5, 2024

Via Electronic Mail and Federal Express

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 521 – Application of Tarpon Towers III, LLC and Cellco Partnership d/b/a Verizon Wireless for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility at 1021-1041 South Main Street in Cheshire, Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's directive, enclosed please find the Applicant's Pre-hearing Submission identifying its witnesses and exhibits filed in advance of the June 13, 2024 evidentiary and public hearing sessions in Docket No. 521.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Kenneth C. Baldwin

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF TARPON TOWERS III,	:	DOCKET NO. 521
LLC AND CELLCO PARTNERSHIP D/B/A	:	
VERIZON WIRELESS FOR A CERTIFICATE	:	
OF ENVIRONMENTAL COMPATIBILITY	:	
AND PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT	:	
1021-1041 SOUTH MAIN STREET,	:	
CHESHIRE, CONNECTICUT	:	JUNE 5, 2024

PRE-HEARING SUBMISSION

Tarpon Towers III, LLC (“Tarpon”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Brett Buggeln, Chief Operating Officer, Tarpon Towers III, LLC
2. Tim Parks, Real Estate Regulatory Specialist, Verizon Wireless
3. Shiva Gadasu, Radio Frequency Engineer, Verizon Wireless
4. Robert Burns P.E., All-Points Technology Corp. P.C.
5. Matthew Gustafson, Wetland Scientist, Professional Soil Scientist, All-Points Technology Corp. P.C.
6. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.

B. Exhibits to be offered

The Applicant intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco on March 13, 2024.
2. Bulk file exhibits including:
 - a. Cellco's "Technical Report" dated December 11, 2023, filed with the Town of Cheshire;
 - b. Town of Cheshire Zoning Regulations;
 - c. Town of Cheshire Inland Wetlands and Watercourses Regulations; and
 - d. Town of Cheshire Plan of Conservation & Development.
3. Affidavit of Publication dated March 27, 2024.
4. Applicant's Motion for Protective Order dated May 29, 2024.
5. Applicant's Sign Posting Affidavit filed on May 29, 2024.
6. Applicant's Responses to Council Interrogatories dated May 30, 2024.


The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, the Applicant's Project Engineer, Robert Burns will make a brief presentation describing the site features and proposed site improvements. Mr. Burns will refer to Site Plan Sheets SP-1 and CP-1, included in Attachment 1 of the Docket No. 521 Application. Electronic copies of Plan Sheets SP-1 and CP-1 are attached to this filing.

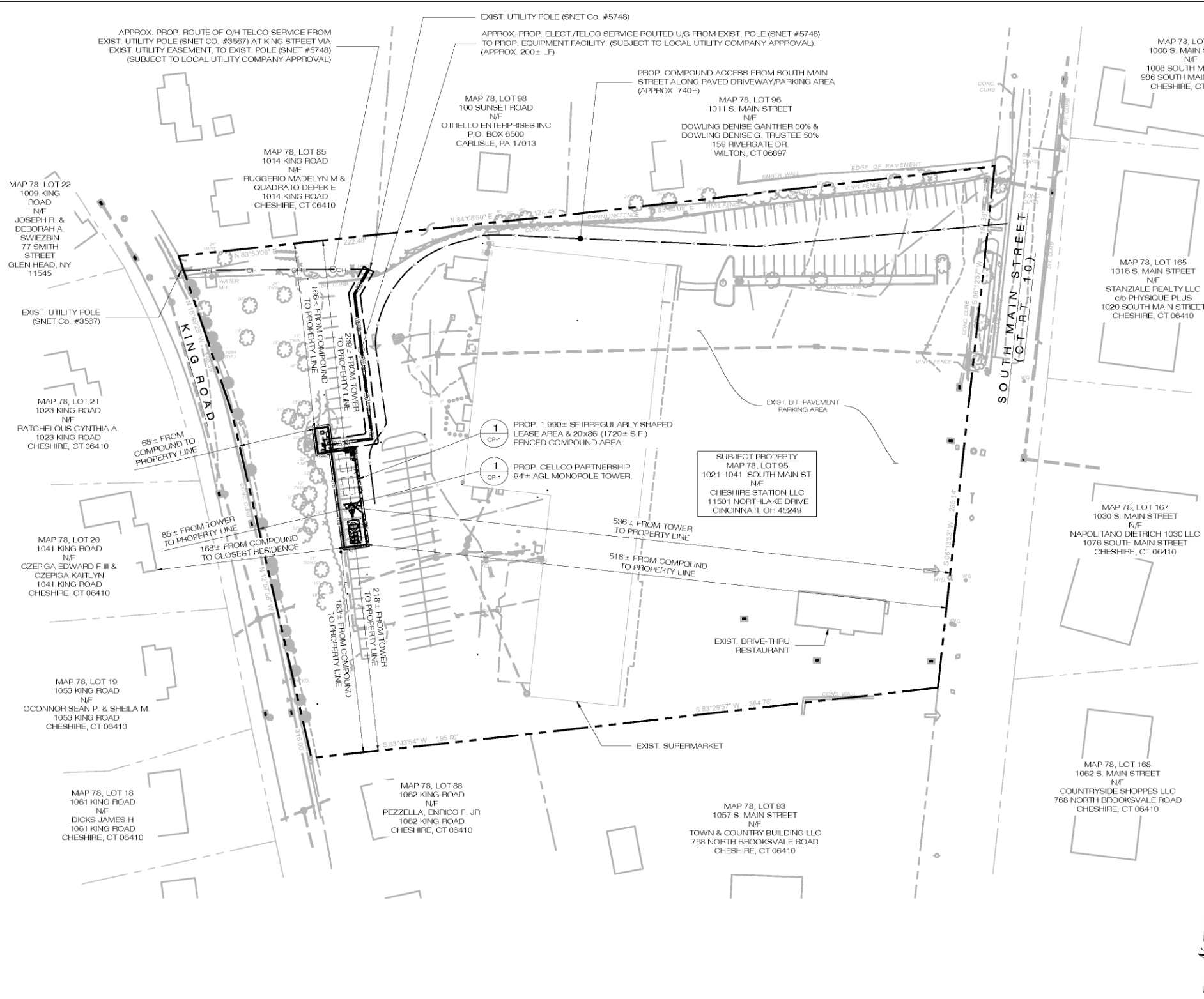
Respectfully submitted,

HOMELAND TOWERS LLC AND
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: _____

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

ATTACHMENT 1



MAP REFERENCE:

1. "TOPOGRAPHIC SURVEY LAND OF CHESHIRE STATION LLC", MAP 78 LOT. 95 1021 SOUTH MAIN STREET (CT ROUTE 10), CHESHIRE, CONNECTICUT, PREPARED BY MARTIN SURVEYING ASSOCIATES, LLC, DATED: 2023-10-31
2. BASE MAPPING SUPPLEMENTED W/ FIELD MEASUREMENTS OBTAINED BY ALL-POINTS TECHNOLOGY CORPORATION ON 05/05/22 & 05/18/22.
3. "ALTA/ASCM LAND TITLE SURVEY", 1021-1041 SOUTH MAIN STREET, CHESHIRE, CT, PREPARED BY KRATZERT, JONES & ASSOCIATES, INC., DATED: 12/29/15

SITE AREAS & VOLUMES OF EARTHWORK

SITWORK ENTAILS APPROXIMATELY 100 CUBIC YARDS OF EXCAVATION. THE COMPOUND WILL IMPORT APPROXIMATELY 50 CUBIC YARDS OF CLEAN BROKEN STONE. THE UTILITY TRENCH FROM THE EXIST. UTILITY POLE TO THE COMPOUND WILL EXCAVATE APPROXIMATELY 90 CUBIC YARDS OF MATERIAL THAT WILL BE USED TO BACKFILL THE TRENCH.

COMPOUND AREA SLOPES:
 EXISTING - 2.0%
 PROPOSED - 2.0%

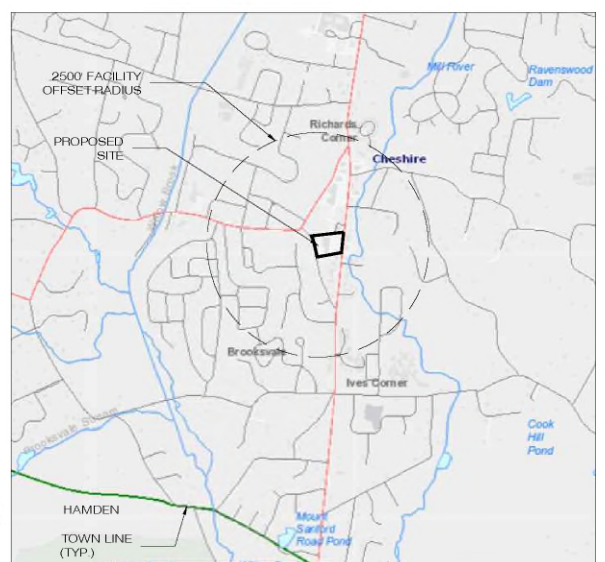
TOTAL AREA OF DISTURBANCE = 3,000± SF

STORMWATER VELOCITY:
 PRIOR TO GROUND COVER < 3.0 FT/SEC
 FOLLOWING GROUND COVER < 3.0 FT/SEC

STORMWATER VOLUME:
 PROPOSED IMPERVIOUS AREA = 1,720 SF
 WATER QUALITY STD VOLUME (1") = 75 CF
 STORAGE VOLUME (6" DEPTH, 40% VOIDS) = 345 CF

GROUND COVER TO BE ESTABLISHED AS FOLLOWS (U.O.N.):
 - WHITE CLOVER @ 0.20#/- SF
 - TALL FESCUE @ 0.45#/- SF
 - RYEGRASS @ 0.10#/- SF

NOTE:
NO TREES WILL NEED TO BE REMOVED IN CONSTRUCTION OF THE FACILITY.



1 ABUTTERS MAP
 SP-1 SCALE: 1" = 50'

2 MUNICIPALITY NOTIFICATION LIMIT MAP
 SP-1 SCALE: 1" = 2000'

Cellco Partnership d/b/a
verizon
 20 ALEXANDER DRIVE
 WALLINGFORD, CT 06492

ALL-POINTS TECHNOLOGY CORPORATION
 567 VAUXHALL STREET EXTENSION - SUITE 311
 WATERFORD, CT 06385 PHONE: (860)-663-1867
 WWW.ALLPOINTS TECH.COM FAX: (860)-663-0635

PERMITTING DOCUMENTS

NO	DATE	REVISION
0	12/11/23	FOR REVIEW: RCB
1	01/15/24	ATTORNEY COMMENTS: RCB
2		
3		
4		
5		
6		

DESIGN PROFESSIONALS OF RECORD
 PROF: ROBERT C. BURNS, P.E.
 COMP: ALL-POINTS TECHNOLOGY CORPORATION, P.C.
 ADD: 567 VAUXHALL STREET EXT. SUITE 311
 WATERFORD, CT 06385

OWNER: CHESHIRE STATION LLC
 ADDRESS: 11501 NORTHLAKE DRIVE
 CINCINNATI, OH 45249

CHESHIRE DT CT

SITE: 1021-1041 SOUTH MAIN ST.
 ADDRESS: CHESHIRE, CT 06410

APT FILING NUMBER: CT141_13390

DRAWN BY: ELZ

DATE: 12/11/23 CHECKED BY: RCB

VZW PROJECT CODE: 20171645495

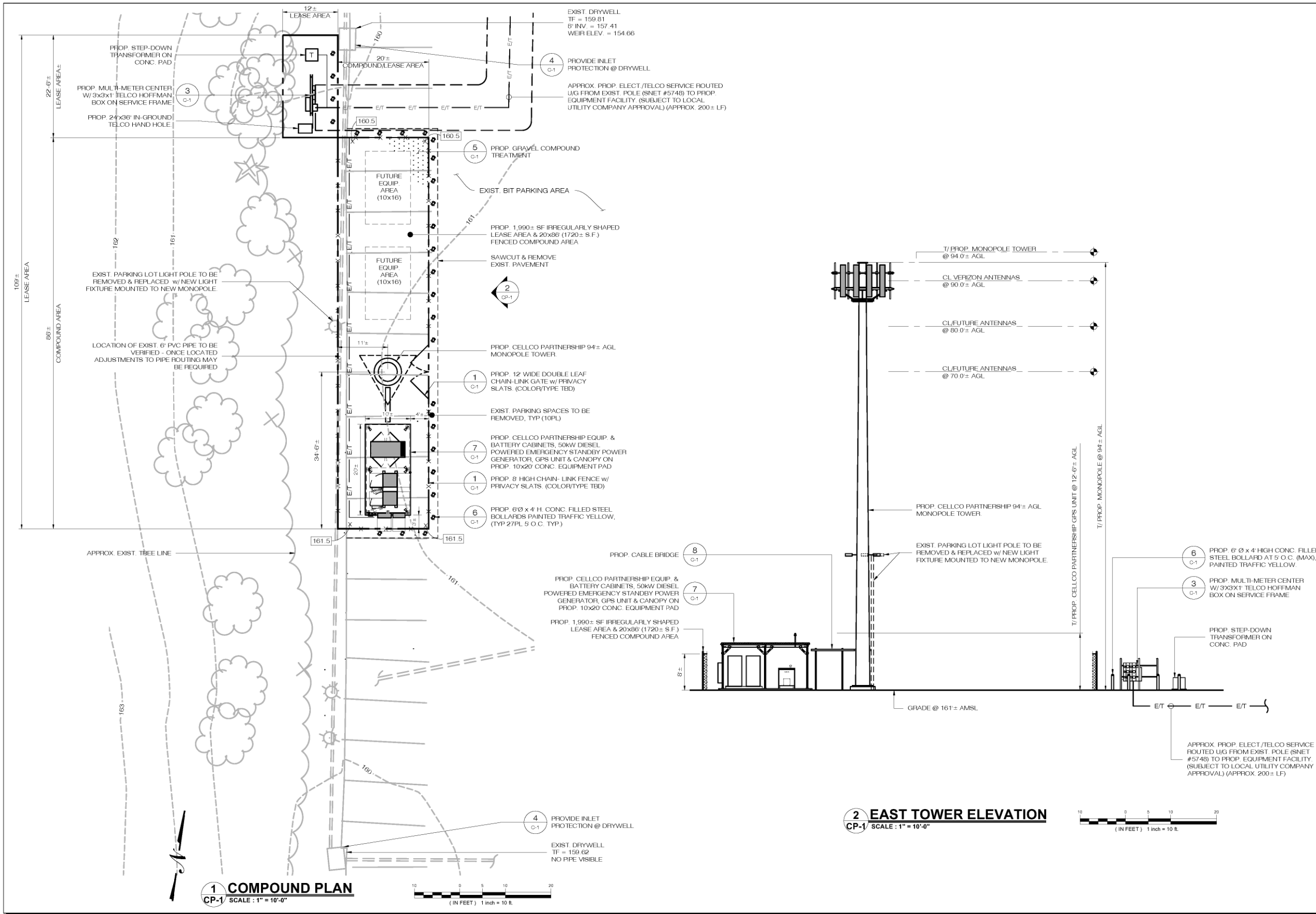
VZW LOCATION CODE: 469929

VZW FUZE ID: 2223597

SHEET TITLE:
ABUTTERS & MUNICIPALITY NOTIFICATION MAP

SHEET NUMBER:
SP-1





Cellco Partnership d/b/a
verizon
20 ALEXANDER DRIVE
WALLINGFORD, CT 06492

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 DATE: 12/11/23 CHECKED BY: RCB
 VZW PROJECT CODE: 20171645495
 VZW LOCATION CODE: 469929
 VZW FUZE ID: 2223597

SHEET TITLE:
COMPOUND PLAN & ELEVATION

SHEET NUMBER:
CP-1