

Jesse A. Langer  
(t) 203.786.8317  
(f) 203.772.2037  
jlanger@uks.com



February 25, 2021

***VIA ELECTRONIC MAIL  
AND FEDERAL EXPRESS***

Ms. Melanie A. Bachman, Esq., Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Re: Prehearing Submission Concerning the Application for Certificate of Environmental Compatibility and Public Need for a proposed monopole wireless telecommunications facility at 800 Prospect Hill Road, Windsor, Connecticut**

Dear Attorney Bachman:

This office represents the applicant, Tarpon Towers II, LLC (“Tarpon”). On behalf of Tarpon, I have enclosed a prehearing submission in connection with the above referenced Application for Certificate of Environmental Compatibility and Public Need.

Please do not hesitate to contact me with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jesse A. Langer', with a stylized flourish at the end.

Jesse A. Langer

Enclosure

3158417

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

APPLICATION OF TARPON TOWERS	:	DOCKET NO. 496
II, LLC FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY	:	
AND PUBLIC NEED FOR THE	:	
CONSTRUCTION, MAINTENANCE	:	
AND OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY	:	
AT 800 PROSPECT HILL ROAD,	:	
WINDSOR, CONNECTICUT	:	February 25, 2021

**PREHEARING SUBMISSION BY THE APPLICANT, TARPON TOWERS II, LLC**

In accordance § 16-50j-22a of the Regulations of Connecticut State Agencies, Tarpon Towers II, LLC (“Tarpon”) respectfully files this Prehearing Submission in connection with the above-captioned Docket pending before the Connecticut Siting Council (“Council”).

**A. Witness List**

1. Keith Coppins, Principal and Owner, Phoenix Partnership LLC;
2. Thomas E. Johnson (“Johnson”), P.E., Managing Partner, ProTerra Design Group, LLC;
3. David Archambault, Vice President of Sales & Business Development, Virtual Site Simulations, LLC; and
4. Brian Gaudet, Project Manager, All-Points Technology Corporation, P.C.

Professional biographies of the aforementioned witnesses are appended hereto as Attachment 1.

Johnson will provide a brief presentation during the public comment session at 6:30p.m. on March 4, 2021. For illustrative purposes, Johnson will refer to Sheets A-1 and A-2 from the detailed site plan appended to Tarpon’s Application as Attachment 1. Sheets A-1 and A-2 are appended hereto as Attachment 2 for the Council’s convenience.

**B. Exhibit List**

1. Tarpon's Application, dated December 4, 2020, including the twenty attachments appended thereto and the bulk filing submission, which includes (a) Tarpon's Technical Report, (b) the Town of Windsor's ("Town") Zoning Regulations, (c) the Town's Inland Wetlands and Watercourses Regulations, (d) the Town's Plan of Conservation and Development, and (e) the Town's Future Land Use Plan;
2. The Council's signed Protective Order concerning an unredacted lease agreement, dated January 14, 2021;
3. Tarpon's responses to the Council's first set of interrogatories, dated February 18, 2021;
4. Tarpon's Sign Posting Affidavit, dated February 17, 2021;
5. Witness professional biographies appended hereto as Attachment 1; and
6. Any other exhibits that may be obtained prior to the hearing and are relevant to the Application or as rebuttal to positions taken by the other parties and intervenors of record.

**C. Items to be Noticed Administratively**

Tarpon does not wish to notice any items administratively at this time.

**D. Direct Testimony**

At the hearing on this Docket, Tarpon intends to adopt the aforementioned exhibits as its direct testimony and thereafter make its representatives available for cross-examination and re-direct examination. Tarpon respectfully reserves the right to offer additional exhibits, witnesses, testimony and administratively noticed materials as may be necessary during the course of the proceedings, including for purposes of rebuttal.

Respectfully submitted by,

TARPON TOWERS II, LLC



By: \_\_\_\_\_

Jesse A. Langer  
Updike, Kelly & Spellacy, P.C.  
8 Frontage Road  
East Haven, CT 06512  
(203) 786-8310  
Email: [jlanger@uks.com](mailto:jlanger@uks.com)

**ATTACHMENT 1**

*(Professional Biographies)*

## **Biography: Keith Coppins**

I am the founder and Managing Director of ARX Wireless, LLC as well as principal/owner of Phoenix Partnership LLC, and am responsible for the development of new wireless telecommunications sites in Connecticut, Massachusetts, Rhode Island and New York, which includes leasing, zoning, construction management and coordination with the wireless carriers to address their coverage needs. 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 have been part of the telecommunications industry for thirty years and my primary focus is on property development, lease contract negotiations, and construction of newly-approved towers. I joined Optasite from Site Acquisitions, Inc. where I was Vice-President and oversaw the leasing, zoning and construction of new towers sites. I also managed a consulting team for AT&T Wireless and T-Mobile.

Prior to Site Acquisitions, I was 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. I have successfully completed all aspects of development activities for more than 450 sites in Connecticut, Massachusetts, Vermont and New York.

## Areas of Expertise

Telecommunication Facility Design  
Project Management  
Site and Subdivision Design  
Structural Evaluation  
Construction Inspection

## Years of Experience

21 Years

## Education

University of Massachusetts  
BS Civil Engineering/ 2000  
Northeastern University  
MS Structural Engineering/2004

## Registration

Professional Engineer/ CT / #28192  
Professional Engineer/ ME / #10915  
Professional Engineer/ PA / #077809  
Title 5 Soil Evaluator / MA / #SE1141  
OSHA Construction Safety & Health  
Training #001417703  
RF Site Safety Awareness Training

## Professional Affiliates

American Society of Civil Engineer  
New England Wireless Association

## Overview

Mr. Johnson has twenty-one years of professional experience in the civil and environmental engineering field, providing services in both the public and private sectors. He has worked on a wide range of development projects including: telecommunication facility design, site design, residential and commercial subdivision design, stormwater analysis, environmental permitting and land planning. His responsibilities have included design development, project permitting, public presentation, site design, and construction administration.

## Project Specific Experience

### New England Telecommunication Facilities Design

Mr. Johnson has managed the engineering design of over 1000 telecommunication facilities for many of the major national carriers and tower development companies throughout New England. The range of services provided for telecommunications sites begin with leasing and design, and continue throughout the construction process with construction coordination, inspections and closeouts.

Through the leasing and design process, Mr. Johnson has worked with the carriers and tower development companies to prepare leasing documents and plans to present to the property owners. The development of zoning and construction drawings needed for filing is managed with an eye towards site-specific requirements and experience in code compliance.

Plan preparation for telecommunication facilities requires extensive collaboration with the multiple parties including: land surveyors required to generate existing conditions and topographical surveys; geotechnical engineers to evaluate existing soils and proposed foundation subbase; coordination with the structural engineer or tower manufacturer on placement and design parameters; and, working with the local utility company for the placement of utility easements and power and telco routing.

Oversight continues during construction with an array of construction coordination services including: the review of shop drawings for steel fabrication; soil resistance testing and equipment grounding design; and, preparation of as-built surveys. This also includes various on-site inspections during the construction process. Subsequent field inspection reports are compiled along with supporting documentation as needed to close out any permits for the site.



F: 401 228 0825

24 Salt Pond Rd, Suite C-3 | Wakefield, RI 02879 | T: 844 838 1450 |

David Archambault  
Founder / Vice President  
Virtual Site Simulations

**VSS**

Your Visual Data Partner

David Archambault, Vice President of Virtual Site Simulations (VSS) is an industry leader and innovator in the field of visual data collection, management and presentation. Since the founding of VSS in 2013, David has performed visual assessments of hundreds of wireless facilities from Florida to Canada on the east coast and out to the Great Lakes, the majority of which were in the New England area, including Connecticut. David's 25 years of industry experience began in 1996 with site acquisition and progressed through both project and zoning management. David owned and sold a small tower company in the early 2000's, then taking on project management overseeing several large carrier builds, before moving on to start VSS. With his extensive knowledge and understanding, David has presented testimony before numerous state, city and municipal zoning, permitting and historical boards, providing impartial data to show an accurate and easy to understand visual representation of a wireless facilities true visual impact on a given area.





**Brian Gaudet**  
**Project Manager, Telecom**  
**Environmental, Siting and Permitting**

**All-Points Technology Corporation, P.C.**  
**567 Vauxhall Street Extension**  
**Suite 311**  
**Waterford, CT 06320**  
**860-581-4482**  
[bgaudet@allpointstech.com](mailto:bgaudet@allpointstech.com)

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## **General Background**

Mr. Gaudet is a Project Manager with over 14 years of professional experience in the wireless telecommunications field, including program, construction and permitting management. His expertise includes siting, zoning and permitting; construction oversight; and regulatory compliance.

Brian assists clients by managing all aspects of a project's siting and permitting requirements for new and modified telecommunications facilities. He has supervised hundreds of sites from initial design through construction. Brian also manages and represents his clients' projects at municipal and state commission hearings.

## **Representative Projects**

### **Environmental Permitting Services for Wireless Telecommunications Clients, Northeast and Mid-Atlantic US**

Brian has been providing siting, land planning and permitting services on behalf of various telecommunications and wireless service providers and tower builders throughout the Northeast and Mid-Atlantic States. He has testified on behalf of numerous clients regarding environmental and aesthetic considerations in front of local municipalities, the CT Siting Council and state and federal agencies. Representative services include: due diligence and land use evaluations; preliminary site screenings; preparation of environmental compliance documentation, environmental assessments to fulfill NEPA requirements; and management of wetlands and vernal pool assessments; vegetative/biological surveys; noise analyses; visibility analyses; graphic support; securing regulatory, zoning, and building permits; and, environmental monitoring during and post-construction.

### **Visibility and Aesthetic Assessments**

Brian has been involved in evaluating visual effects of small and large-scale projects on the environment, primarily in wireless telecommunication development. Utilizing a technique that incorporates a combination of predictive computer modeling and in-field analysis, he can assess visibility on both a quantitative and qualitative basis. The predictive model provides a measurable assessment of visibility throughout a pre-defined study area, including private properties and other areas inaccessible for direct observations. The field review includes a balloon float or crane test and field reconnaissance to record existing conditions, verify results of the model, inventory visible and non-visible locations, and provide photographic documentation from publicly accessible areas. These assessments typically include photographic simulations depicting scaled renderings of a project to demonstrate the character of the development in its setting.

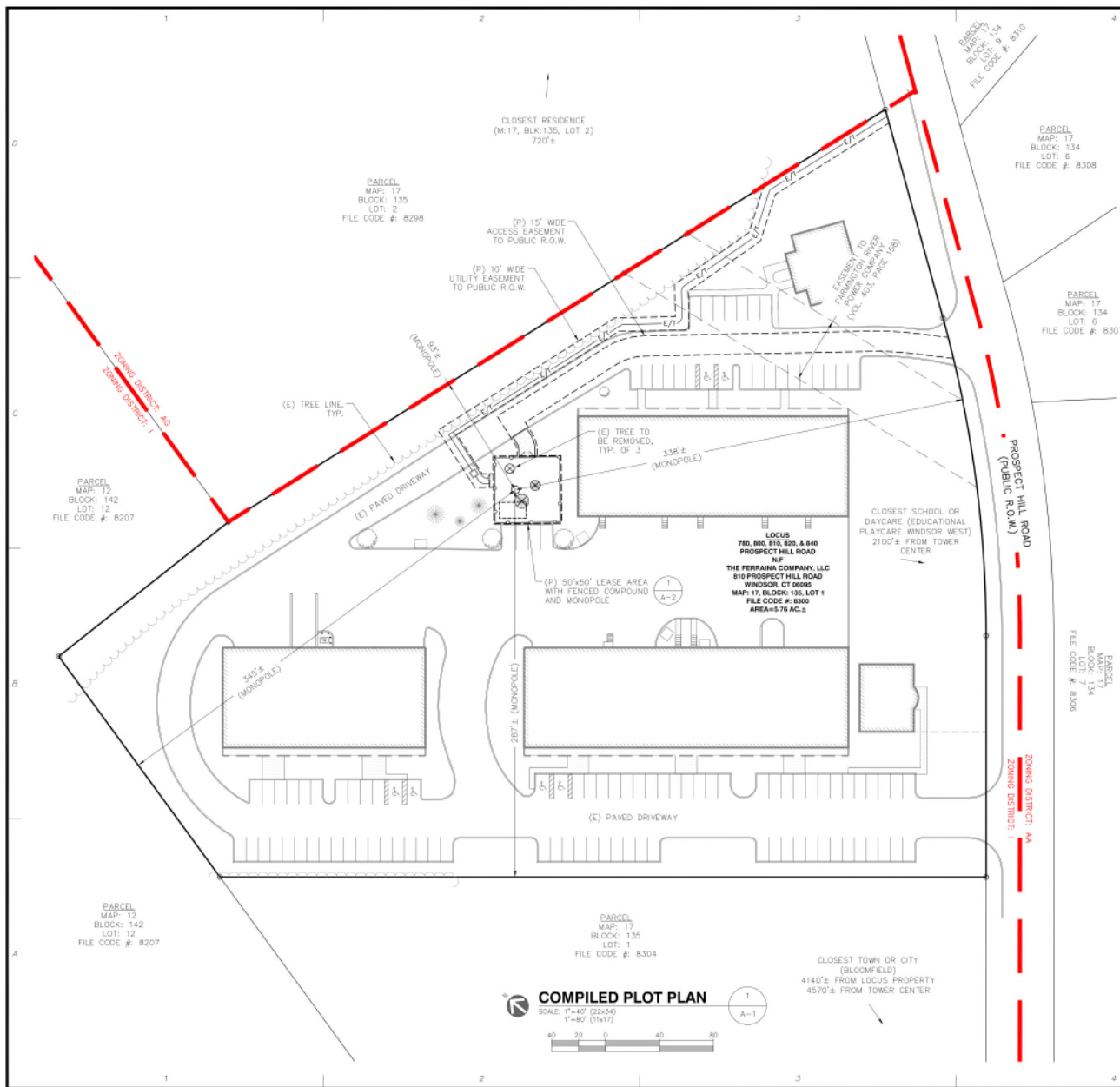
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### **Education**

Muhlenberg College, B.A. Business Administration, May 2011  
Concentration in Entrepreneurial Studies

**ATTACHMENT 2**

*(Sheets A-1 and A-2 of the Detailed Site Plan)*



**GENERAL NOTES**

1. THE TYPE, DIMENSIONS, MOUNTING HARDWARE, AND POSITIONS OF ALL PROJECT OWNER'S EQUIPMENT ARE SHOWN IN ILLUSTRATIVE FASHION. THESE DRAWINGS ARE NOT INTENDED FOR CONSTRUCTION. ACTUAL HARDWARE DETAILS AND FINAL LOCATIONS MAY DIFFER SLIGHTLY FROM WHAT IS SHOWN.
2. THE PROJECT OWNER'S PCS FACILITY IS AN UNMANNED PRIVATE AND SECURED EQUIPMENT INSTALLATION. IT IS ONLY ACCESSED BY TRAINED TECHNICIANS FOR PERIODIC ROUTINE MAINTENANCE AND THEREFORE DOES NOT REQUIRE ANY WATER OR SANITARY SEWER SERVICE. THE FACILITY IS NOT GOVERNED BY REGULATIONS REQUIRING PUBLIC ACCESS PER ADA REQUIREMENTS.
3. THE DESIGN OF THE TOWER, FOUNDATION AND ANTENNA MOUNTING HARDWARE WILL MEET THE ANSI/EIA/TIA-222 STANDARDS FOR STRUCTURAL STEEL ANTENNA SUPPORTING STRUCTURES AND STATE BUILDING CODE REQUIREMENTS. DETAILED CONSTRUCTION DRAWINGS AND STRUCTURAL CALCULATIONS WILL BE PREPARED BY A REGISTERED PROFESSIONAL ENGINEER AND SUBMITTED WITH A BUILDING PERMIT APPLICATION FOR REVIEW AND APPROVAL BY THE LOCAL BUILDING CODE ENFORCEMENT OFFICIAL.
4. ONCE THE FACILITY BECOMES FULLY OPERATIONAL, NORMAL AND ROUTINE MAINTENANCE BY TOWER OWNER'S AND CARRIER'S TECHNICIANS WILL BE PERFORMED. THE ESTIMATED VEHICULAR TRAFFIC GENERATED BY THESE VISITS IS PREDICTED TO BE LESS THAN THE TYPICAL TRAFFIC GENERATED BY A SINGLE-FAMILY DWELLING.

**REFERENCES**

PROPERTY LINE, TOPOGRAPHY AND EXISTING FEATURES - SEE SHEET C-1 PREPARED BY ALFORD ASSOCIATES, INC. A PROPERTY LINE AND/OR BOUNDARY RE-TRACEMENT HAS NOT BEEN PERFORMED. A A-2 SURVEY MAY BE REQUIRED PER CSC APPLICATION REVIEW.

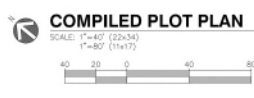
ZONING DISTRICTS - TOWN OF WINDSOR, CT GIS DATA PORTAL

FLOODPLAIN - FLOOD INSURANCE RATE MAP (FIRM) MAP NUMBER 09003C0214F EFFECTIVE DATE SEPTEMBER 26, 2008 PREPARED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA), US DEPARTMENT OF HOMELAND SECURITY. ENTIRE AREA SHOWN IS WITHIN ZONE "X" UNSHADED. AREAS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL FLOOD CHANCE FLOODPLAIN.

**CSC DIMENSIONS**

ASSESSORS ID: MAP 17, BLOCK 135, LOT 1  
(P) USE: WIRELESS COMMUNICATION FACILITY

MONOPOLE HEIGHT (HIGHEST APPURTENANCE)	135'± (139'±)
EXISTING SITE ACCESS LENGTH	360'±
PROPOSED SITE ACCESS LENGTH	20'±
NUMBER OF TREES OVER 6" DBH TO BE REMOVED	3
NUMBER OF RESIDENCES WITHIN 1000 FEET	13
CLOSEST TOWN OR CITY TO LOCUS PARCEL	4140'± (BLOOMFIELD)
FOLLOWING DISTANCES FROM TOWER CENTER	
NEAREST WETLANDS (ON LOCUS PROPERTY)	N/A
NORTHERN PROPERTY BOUNDARY	93'±
SOUTHERN PROPERTY BOUNDARY	287'±
WESTERN PROPERTY BOUNDARY	345'±
EASTERN PROPERTY BOUNDARY	338'±
CLOSEST RESIDENCE	720'± (M:17; BHL:135 L:2)
CLOSEST SCHOOL OR DAYCARE	2100'± (EDUCATIONAL PLAYCARE WINDSOR WEST)
CLOSEST TOWN OR CITY	4570'± (BLOOMFIELD)



CONSULTANTS:

NO.	DATE	REVISIONS
1	12/21/18	ISSUED FOR REVIEW
2	01/16/19	PERMITTING REVISED
3	02/12/19	PERMITTING REVISED
4	02/12/19	PERMITTING REVISED
5	03/18/19	PERMITTING REVISED

NO.	DATE	REVISIONS
1	12/21/18	ISSUED FOR REVIEW
2	01/16/19	PERMITTING REVISED
3	02/12/19	PERMITTING REVISED
4	02/12/19	PERMITTING REVISED
5	03/18/19	PERMITTING REVISED

**SITE NAME: WINDSOR**  
**SITE NUMBER: CT 1209**  
**ADDRESS: 800 PROSPECT HILL ROAD**  
**WINDSOR, CT 06095**

**TARAPON TOWERS II, LLC**  
**1001 3RD AVENUE WEST**  
**SUITE 420**  
**BRADENTON, FL 34205**

TOWER OWNER:  
**TARAPON TOWERS**



DATE: 12/21/18  
 DRAWN: BLM  
 CHECK: JMM/TEJ  
 SCALE: SEE PLAN  
 JOB NO.: 18-027

SHEET TITLE:  
**COMPILED PLOT PLAN**  
**A-1**

CONSULTANTS:

NO.	DATE	REVISIONS
1	12/21/18	ISSUED FOR REVIEW
2	12/21/18	PERMITTING REVISED
3	12/21/18	PERMITTING REVISED
4	12/21/18	PERMITTING REVISED
5	12/21/18	PERMITTING REVISED

**SITE NAME: WINDSOR**  
**SITE NUMBER: CT 1209**  
**ADDRESS: 800 PROSPECT HILL ROAD**  
**WINDSOR, CT 06095**

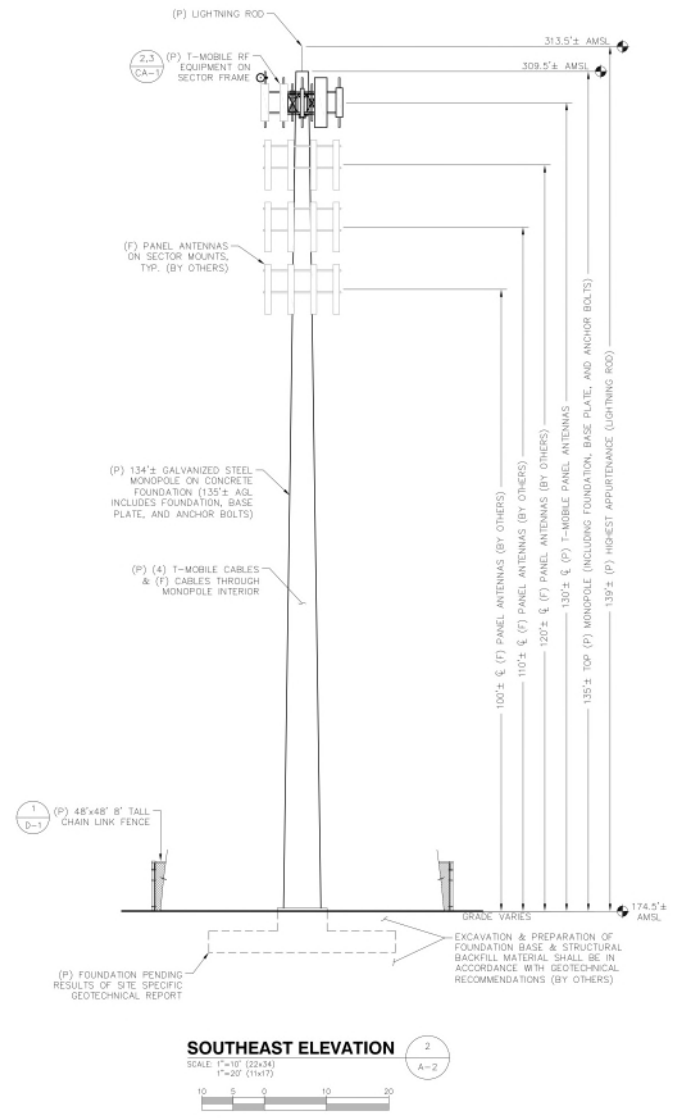
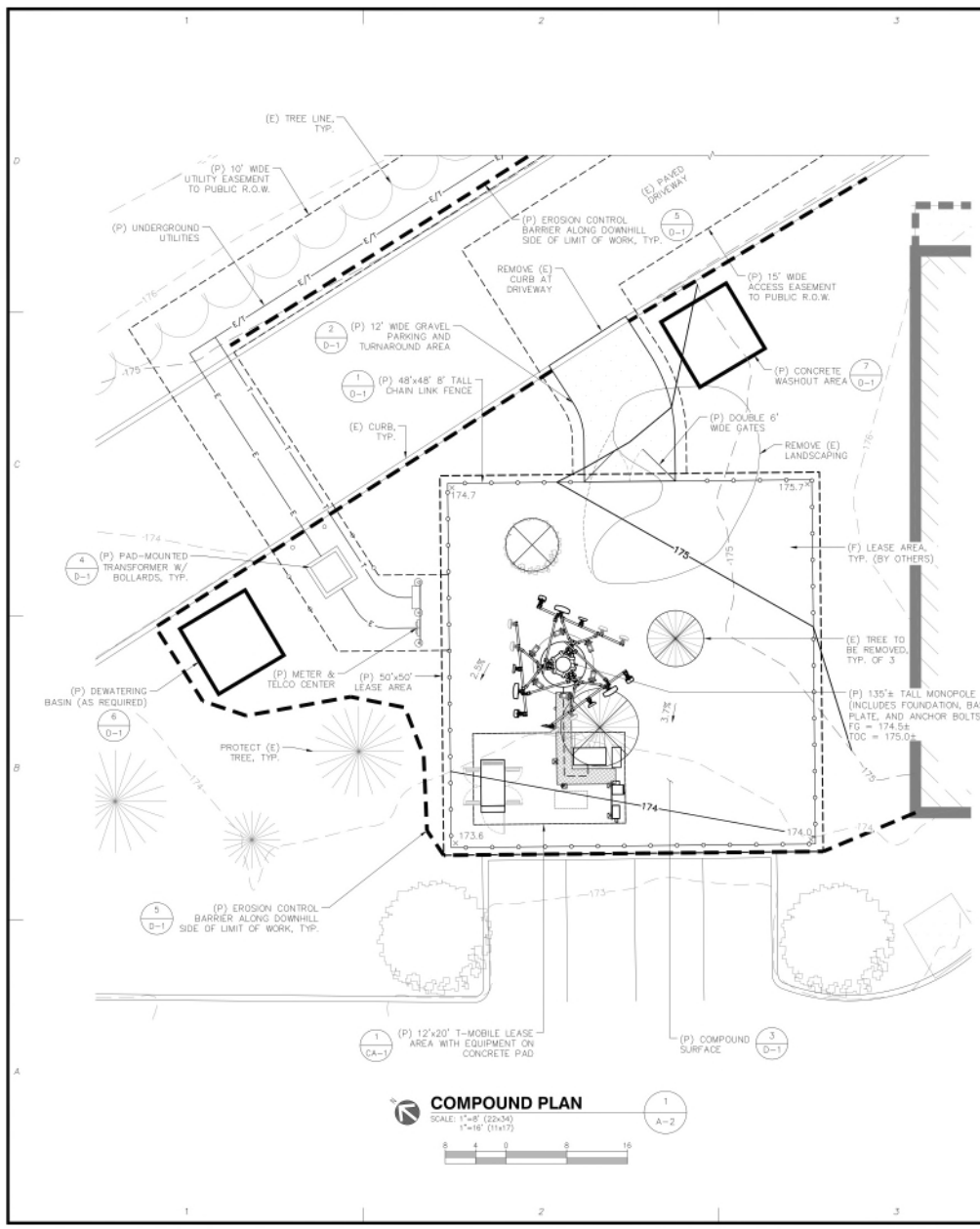
TOWER OWNER:  
**TARPOON TOWERS II, LLC**  
1001 3RD AVENUE WEST  
SUITE 420  
BRADENTON, FL 34205



DATE: 12/21/18  
DRAWN: BLM  
CHECK: JMM/TEJ  
SCALE: SEE PLAN  
JOB NO.: 18-027

SHEET TITLE:  
**COMPOUND PLAN & ELEVATION**

**A-2**



**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Docket No. 496 on February 25, 2021:

*Counsel for T-Mobile Northeast LLC*

Jesse A. Langer

Updike, Kelly & Spellacy, P.C.

8 Frontage Road

East Haven, CT 06512

(203) 786-8310

Email: [jlanger@uks.com](mailto:jlanger@uks.com)



By: \_\_\_\_\_

Jesse A. Langer

Updike, Kelly & Spellacy, P.C.