

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE
NORTHEAST, LLC FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 123 PINE ORCHARD ROAD IN THE
TOWN OF BRANFORD, CONNECTICUT

DOCKET NO. 386

Date: December 7, 2009

PRE-FILED TESTIMONY OF SCOTT M. CHASSE

Q1. Please state your name and profession.

A1. Scott M. Chasse and I am a civil engineer and co-founder of All-Points Technology Corporation ("All-Points").

Q2. What kind of services does All-Points provide?

A2. All-Points is a civil and structural engineering firm with offices located in Killingworth, Connecticut and North Conway, New Hampshire that provides design and permitting services to wireless providers in the northeast including Connecticut and New York. All-Points develops zoning and construction drawings for the installation of prefabricated equipment shelters and equipment cabinet arrays with supporting antennae on existing structures and for new stand-alone cellular towers. All-Points also manages surveys, wetland delineations, coastal consistency analyses and visual resource evaluations for proposed telecommunications facilities.

Q3. Please summarize your professional background in telecommunications.

A3. I have a B.S. in civil engineering from the University of Connecticut. I have been licensed as a professional engineer in Connecticut since 1997 and in New York since 2001. I have over thirteen years of experience in the telecommunications industry. My experience includes the zoning, design and construction of more than 1250 wireless telecommunications facilities.

Q4. What services did All-Points provide T-Mobile with respect to the proposed Facility?

A4. T-Mobile retained All-Points to design and prepare the site plans for the proposed telecommunications facility at 121 & 123 Pine Orchard Road, Branford, Connecticut (the "Facility"). The site plans included the site access plan, the compound plan and tower elevation for the Facility. In addition, All-Points evaluated the proposed development and the tree inventory to determine whether the proposed Facility would require the removal of any trees.

Q5. Please describe the site of the proposed Facility?

A5. The site of the proposed Facility and access thereto is located at 121 & 123 Pine Orchard Road, Branford, Connecticut (the "Property"). The Property is a 4.15 acre parcel and is designated on the Assessor's Tax Map as Map F08, Block 6, Lots 49 & 50. The Property is zoned for residential and some commercial uses. Malavasi Investments LLC d.b.a. Ace Trucking, owns the Property and currently uses the Property for commercial storage (trailers) and residential use. T-Mobile would lease a 5,625 square foot area located in the southeasterly portion of the Property.

Q6. Please describe the access to the proposed Facility.

A6. Vehicular access to the Facility would extend from Pine Orchard Road. T-Mobile proposes to add a nominal expansion to the existing bituminous driveway and curb cut currently serving the Property. This minor expansion of the existing access is being proposed to ensure that T-Mobile's access to the Property is located entirely on the landlord's parcel, and not on any land designated as a common drive/easement. The remainder of the access would remain unchanged and run over the existing paved driveway and gravel parking lot. An updated site plan is attached hereto as Attachment A. The expansion would require minimal disturbance and the removal of one mature tree. The updated tree inventory letter is attached hereto as Attachment B.

Q7. Please describe the proposed Facility.

A7. The Facility would consist of a 125-foot monopole structure with antenna arrays mounted thereon and related equipment on the ground at the base on a concrete pad. The Facility would sit within a 2,500 square foot compound within the 5,625 square feet leased area. T-Mobile would install panel antennas mounted on standoff cross arms at 122'9" above grade level. The Facility would also accommodate three additional carriers in the Connecticut marketplace. The compound would be enclosed by an eight-foot chain link fence. T-Mobile would extend utility services underground from existing overhead utility demarcations located on Pine Orchard Road to the proposed Facility.

Q8. Would the construction, operation and maintenance of the proposed Facility require the removal or relocation of any trees?

A8. No. T-Mobile would not have to remove or relocate any trees with respect to the Facility itself. As discussed above, T-Mobile would only have to remove one tree to expand the access to the site.

Q9. How much clearing and grading is necessary?

A9. There would be approximately 8,800 +/- square feet of disturbed area required for the proposed installation (i.e. compound, utilities and access). In my opinion, with appropriate sedimentation and erosion controls installed, this amount of disturbance would be minimal.

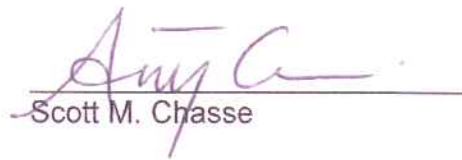
Q10. Please describe the results of the on-site wetlands inspection.

A10. At the request of T-Mobile, All-Points retained Vanasse Hangen Brustlin, Inc. ("VHB") to conduct a wetlands inspection of the Property, the results of which are found at Exhibit K of the Application. All-Points and VHB reviewed the materials concerning the location of the proposed Facility, access drive and utility easements. VHB then conducted an in-field review of the property to determine the location of wetlands on or near the Property and the impact of the proposed Facility on any wetlands. Based upon VHB's inspection, there are no wetland systems on the Property. The nearest wetland system is approximately 150 feet from the proposed leased area on an adjacent property. T-Mobile would install erosion control measures prior to start of any construction and removed upon completion and stabilization of the construction area.

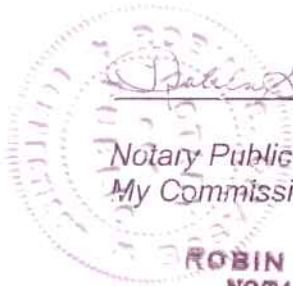

Therefore, the proposed Facility would not directly or indirectly affect the identified wetlands or watercourses.

Q11. Can the tower be designed with a pre-engineered fault to prevent encroachment on adjacent properties?

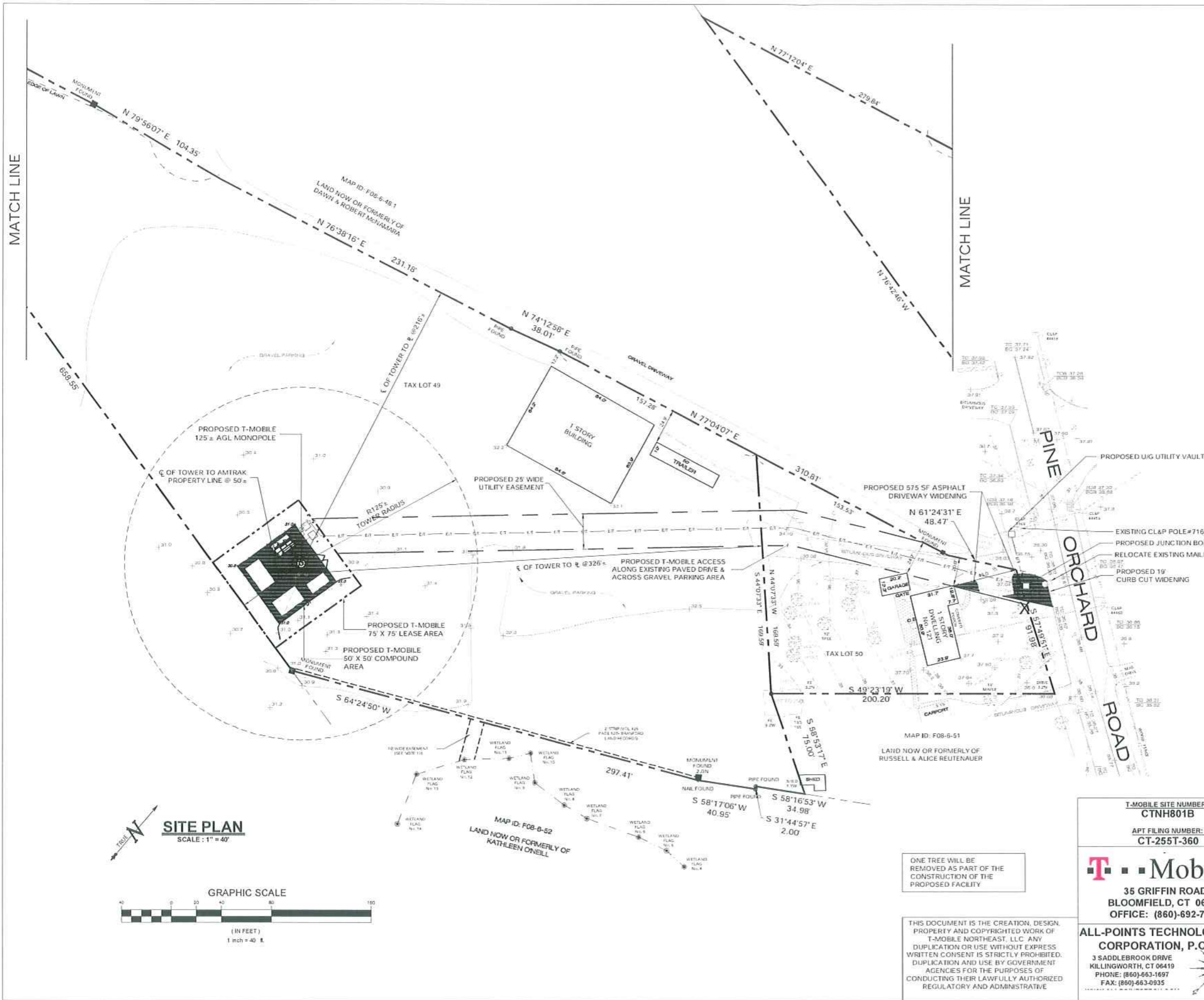
A11. Yes, it is common practice to design towers with such engineered faults and in fact many of the facilities approved by the Council have been designed in this manner.


Scott M. Chasse

Sworn and subscribed to before me this
7th day of December, 2009.



Notary Public
My Commission expires
ROBIN S. CHASSE
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2014

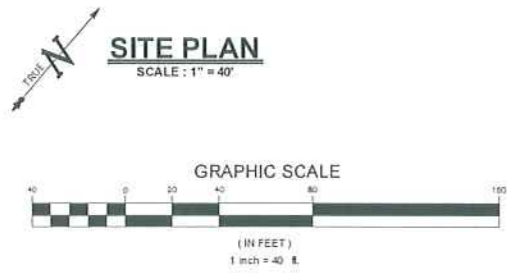
ATTACHMENT A



LEGEND

	BITUMINOUS CURB		WETLAND FLAG
	EDGE OF PAVEMENT		MAIL BOX
	OVERHEAD WIRES		HYDRANT
	UTILITY POLE		WATER VALVE
	CONTOUR		STRUCTURE - MANHOLE
	SPOT ELEVATION		CATCH BASIN
	CONCRETE		GAS VALVE
	GUY WIRE		TREE
			STONE WALL

- NOTES**
- THIS MAP AND SURVEY HAVE BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-300b-1 THROUGH 20-300b-20 AND THE "STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT," AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. ON SEPTEMBER 25, 1996.
 - THE TYPE OF SURVEY PERFORMED AND THE MAPPED FEATURES DEPICTED HEREON ARE IN ACCORDANCE WITH THE REQUIREMENTS OF A PROPERTY SURVEY.
 - BOUNDARY DETERMINATION CATEGORY: DEPENDENT RESURVEY OF REFERENCE MAP 'A'.
 - HORIZONTAL ACCURACY CLASS: A-2.
 - VERTICAL ACCURACY CLASS: T-2. ELEVATIONS REFER TO NATIONAL GEODETIC VERTICAL DATUM 1929. TOPOGRAPHIC INFORMATION IS DEPICTED ONLY FOR A PORTION OF THE PROPERTY.
 - LOT AREA = 100,986 SQUARE FEET OR 4.1549 ACRES.
 - ALL MONUMENTATION FOUND OR SET ON THE SUBJECT PREMISES IS DEPICTED HEREON.
 - NORTH ARROW AND BEARINGS REFER TO REFERENCE MAP 'A'.
 - REFERENCE MAPS:
 - (A) MAP OF PROPERTIES OF BARBARA A. PRIFITERA, #121 PINE ORCHARD ROAD & ANTHONY GIORDANO, #123 PINE ORCHARD ROAD, BRANFORD, CONNECTICUT, PREPARED BY WOODWORTH ASSOCIATES, P.C. DATED 10/11/02, REVISED 11/16/02, AND FILED WITH THE BRANFORD TOWN CLERK AS MAP NUMBER 3170.
 - (B) PROPOSED DIVISION OF FRANK T. & SANDRA M.J. DAMATO LOCATED AT 117 PINE ORCHARD ROAD, BRANFORD, CT, PREPARED BY ASSOCIATED SURVEYS, DATED MARCH 17, 1992, REVISED AUGUST 10, 1995, AND FILED WITH THE BRANFORD TOWN CLERK AS MAP NUMBER 2728.
 - (C) PROPERTY TO BE CONVEYED TO ANTHONY & HELEN GIORDANO FROM VINCENT DOMKOWSKI, PINE ORCHARD ROAD, BRANFORD, CT, PREPARED BY S.A. HANCHURUCK, JR. DATED MARCH 26, 1987 AND FILED AS MAP NUMBER 2111 WITH THE BRANFORD TOWN CLERK.
 - THE PROPERTY IS SUBJECT TO:
 - (A) AN EASEMENT IN FAVOR OF TAX LOT 49 OVER TAX LOT 50 RECORDED IN VOLUME 698 AT PAGE 925 OF THE BRANFORD LAND RECORDS (BLR).
 - (B) RIGHTS GRANTED TO THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY RECORDED IN VOL. 49 AT PAGE 431 OF THE BLR.
 - TAX LOT 49 IS TOGETHER WITH (A) AN EASEMENT TO DRAIN & DISCHARGE WATER ACROSS A 10' STRIP OF LAND TO THE ROAD ON TAX LOT 52 FORMERLY OF DOMKOWSKI (SEE VOL. 425 PAGE 520 OF THE BLR, REFERENCE MAP 'C'). LOCATION SCALED FROM REFERENCE MAP, NO DIMENSIONS GIVEN; (B) THE RIGHT TO PASS AND REPASS OVER TAX LOT 50 AS RECORDED IN VOLUME 698 AT PAGE 925 OF THE BLR.
 - PARCEL OWNER OF RECORD: MALAYAS INVESTMENTS, 35 STONY CREEK ROAD, BRANFORD, CT.
 - WETLAND FLAGS SET BY: VANASSE, HANGEN, BRUSTLIN, INC.
 - THE OFFSETS OR DIMENSIONS SHOWN FROM STRUCTURES TO THE PROPERTY LINES ARE FOR A SPECIFIC PURPOSE AND USE. THEY ARE NOT INTENDED TO GUIDE IN THE ERECTION OF FENCES, RETAINING WALLS, POOLS, PATIOS, PLANTING AREAS, ADDITIONS TO BUILDINGS, OR ANY OTHER CONSTRUCTION.
 - SUBSURFACE AND ENVIRONMENTAL CONDITIONS WERE NOT EXAMINED OR CONSIDERED AS PART OF THIS SURVEY.



ONE TREE WILL BE REMOVED AS PART OF THE CONSTRUCTION OF THE PROPOSED FACILITY.

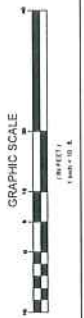
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T-MOBILE SITE NUMBER: CTNH801B	PERMITTING DOCUMENTS AMTRAK BRANFORD 123 PINE ORCHARD ROAD BRANFORD, CT 06405-3939	SITE PLAN
APT FILING NUMBER: CT-255T-360	DESIGN TYPE: RAW LAND	
	35 GRIFFIN ROAD BLOOMFIELD, CT 06002 OFFICE: (860)-692-7100	APT FILING NUMBER: CT-255T-360 APT DRAWING NUMBER: CTNH810B SP-1 DRAWN BY: RCB CHECKED BY: SMC SCALE: AS NOTED DATE: 04/22/09
ALL-POINTS TECHNOLOGY CORPORATION, P.C.	3 SADDLEBROOK DRIVE KILLINGWORTH, CT 06419 PHONE: (860)-663-1697 FAX: (860)-663-0935	SHEET NUMBER: SP-1
	REVISIONS: REV.0: 05/15/09: FOR REVIEW: SMC REV.1: 05/20/09: FOR REVIEW: SMC REV.2: 05/26/09: FINAL REV.3: 07/27/09: FOR CSC: SMC REV.4: 12/01/09: REVISED DRIVEWAY: SMC	



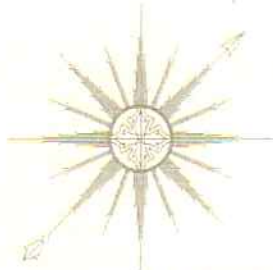
PERMITTING DOCUMENTS AMTRAK BRANFORD 123 PINE ORCHARD ROAD BRANFORD, CT 06405-3935		DRAWING NUMBER: CT-2551-360 SCALE: AS NOTED CHECKED BY: LMC DATE: 04/20/09	
GENERAL TITLE: RAW LAND		SHEET NUMBER: D-1	
PROJECT: 35 GRIFRN ROAD BLOOMFIELD, CT 06002 OFFICE: (860) 492-7100		PERMITS: REG. 200909 FOR REVIEW, INC. REG. 200909 FOR REVIEW, INC. REG. 200909 FINAL REG. 200909 FOR REG. INC. REG. 200909 FOR REG. INC.	
PROJECT CLIENT: Mobile 35 GRIFRN ROAD BLOOMFIELD, CT 06002 OFFICE: (860) 492-7100		PROJECT ARCHITECT: ALL-POINTS TECHNOLOGY CORPORATION, P.C. 3 BACLOBROOK DRIVE HARTFORD, CT 06103 PHONE: (860) 492-7100 FAX: (860) 492-9393 WWW.ALLPOINTSTECH.COM	

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DRIVEWAY ENTRANCE PLAN
 SCALE: 1" = 10'-0"

ATTACHMENT B



ALL-POINTS TECHNOLOGY CORPORATION, P.C.

Ms. Julie D. Kohler, Esq.
Cohen and Wolf P.C.
1115 Broad Street
Bridgeport, CT 06604

December 2, 2009

RE: Tree Inventory
Site: CTNH801B Amtrak – Branford
123 Pine Orchard Road
Branford, CT 06405

Dear Ms. Kohler:

A Tree Inventory was completed at the subject site on November 25, 2009 to determine size and quantity of existing trees that will need to be removed for the installation of the proposed facility. Access to the facility is via a proposed expansion of the existing bituminous driveway and curb cut currently situated adjacent to and partially serving the subject site. T-Mobile proposes a minor expansion of the existing access to ensure that its access to the property is located entirely on the landlord's parcel. The expansion of said driveway will require the removal of one tree (38" oak). Installation of the proposed 50' x 50' compound area and underground utilities will not require the removal any additional trees.

Sincerely,

ALL-POINTS TECHNOLOGY CORPORATION, P.C.

Scott M. Chasse, P.E.
Principal



Tree Inventory Letter - CTNH801B Branford REV1.doc