

JULIE D. KOHLER

PLEASE REPLY TO: Bridgeport
WRITER'S DIRECT DIAL: (203) 337-4157
E-Mail Address: jkohler@cohenandwolf.com

May 26, 2015

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

Re: Docket No. 458: Florida Tower Partners LLC d/b/a North Atlantic Towers Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation, of a telecommunications facility at one of two locations at Bethel Tax Assessor's Map 65, Block 57, Lot 122, 62-64 Codfish Hill Road, Bethel, Connecticut.

Dear Attorney Bachman:

On behalf of Florida Tower Partners LLC d/b/a/ North Atlantic Towers, enclosed please find the following items:

1. Applicant's Pre-hearing Submission dated May 26, 2015;
2. Affidavit of Public Notice Sign Posting;
3. Applicant's Responses to Siting Council Interrogatories dated May 26, 2015;
4. Pre-filed testimony of Keith Coppins dated May 26, 2015; and
5. Pre-filed testimony of Michael Libertine dated May 26, 2015.

If you have any questions regarding the enclosed, please do not hesitate to contact me.

Very truly yours,


Julie D. Kohler

JDK/lcc
Enclosures

May 26, 2015
Page 2

cc: Service List (*via overnight mail*)
Keith Coppins, Phoenix Partnership (via electronic mail)
Brett Buggeln, North Atlantic Towers (via electronic mail)
Todd Bowman, North Atlantic Towers (via electronic mail)

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY FLORIDA TOWER
PARTNERS LLC D/B/A NORTH
ATLANTIC TOWERS FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 62-64 CODFISH HILL ROAD IN THE
TOWN OF BETHEL, CONNECTICUT

DOCKET NO. 458

Date: May 26, 2015

**PRE-HEARING SUBMISSION OF
FLORIDA TOWER PARTNERS LLC d/b/a NORTH ATLANTIC TOWERS**

Florida Tower Partners LLC d/b/a North Atlantic Towers ("Applicant") provides the following hearing information in the above captioned proceeding:

List of Witnesses

1. Keith Coppins, Principal/Owner, Phoenix Partnership, LLC;
2. Carlo F. Centore, P.E., Civil Engineer for Centek Engineering, Inc.;
3. Michael P. Libertine, Director of Siting and Permitting, All Points Technology, Inc.; and
4. Dean E. Gustafson, Senior Wetlands Scientist and Professional Soil Scientist, All Points Technology, Inc.

Resumes/professional biographies are provided as Attachment 1.

Exhibits to be Offered

1. Application for a Certificate of Environmental Compatibility and Public Need submitted by Florida Tower Partners LLC d/b/a North Atlantic Towers dated March 19, 2015, including attachments and the following bulk filed exhibits:
 - a. Town of Bethel Wetland and Watercourses Regulations, adopted December 12, 1991;
 - b. Town of Bethel Zoning Regulations, effective August 15, 2014;

- c. Town of Bethel Zoning Map;
 - d. Town of Bethel Plan of Conservation and Development, effective October 15, 2007; and
 - e. Applicant's Technical Report submitted to the Town of Bethel on June 28, 2013.
2. Affidavit of Sign Posting dated May 21, 2015 and photographs dated May 15, 2015.
 3. Applicant's responses to Siting Council Interrogatories dated May 26, 2015.
 4. Prefiled testimony of Keith Coppins dated May 26, 2015.
 5. Prefiled testimony of Michael Libertine dated May 26, 2015.

The Applicant reserves the right to offer additional exhibits, witnesses, testimony, and administratively noticed materials as may be necessary when new information comes to its attention during the hearing process or in rebuttal to positions taken by the Siting Council, parties or intervenors.

Dated at Bridgeport, Connecticut, this 26th day of May, 2015.

Respectfully submitted,

By: 

Julie D. Kohler, Esq.
Rachel Schwartzman
Cohen and Wolf, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by electronic mail and overnight mail to all parties and intervenors of record, as follows:

Daniel M. Laub, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
dlaub@cuddyfeder.com

Keith R. Ainsworth, Esq.
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P.O. Box 1694
New Haven, CT 06507-1694
krainsworth@EFandA-law.com

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
kbaldwin@rc.com



Julie D. Kohler, Esq.

ATTACHMENT 1

KEITH E. COPPINS

110 Washington Avenue North Haven, CT 06473 (203) 623-3287

Telecommunications Industry Professional:
Tower Ownership, Construction Management, Leasing and Zoning Consultant

Qualifications Over twenty years in the wireless industry working with carriers, tower owners, contractors and landlords in the siting of wireless infrastructure. The ability to work closely with wireless carriers to identify and address coverage deficiencies, successfully negotiate leases, coordinate zoning applications and manage teams to develop wireless telecommunications facility solutions.

Professional Experience

Phoenix Partnership, LLC February 2008 - Present
Principal/Owner

Responsible for the development of new tower sites for Phoenix Partnership and North Atlantic Towers in the Northeast. Consultant to wireless and tower companies to provide services which include leasing, zoning, construction and maintenance of new and existing tower sites.

Optasite, Inc July 2004 – January 2008
Vice President of Development

Responsible for the development of tower sites in the northeast and New York and managed a team of consultants for T-Mobile in Connecticut, Massachusetts and Rhode Island.

Site Acquisitions, Inc August 2001 – June 2004
Vice President of Development

Developed new tower sites in New York, Massachusetts and Connecticut. Worked as a consultant for Nextel Communications.

American Tower/B&E Associates March 1993 – July 2001
General Manager

Oversaw a team of consultants for Albany Telephone in leasing and zoning of new facilities. B&E Associates was purchased by American Tower in 1997 and I continued to be the General Manager working with Southern New England Telephone and Cellular One performing the same duties as for B&E Associates.

PROFILE

Mr. Centore has over 30 years of experience in engineering and construction. He has been responsible for the planning, design, construction, and project management on a broad set of publicly and privately developed projects. He has gained considerable insight into the requirements of project planning, practical engineering solutions, and fast-track projects. Significant projects have included schools, public housing projects building restoration, high-rise construction and most recently the planning and design of over 3,000 wireless telecommunications facilities.

REPRESENTATIVE PROJECTS

Major Construction Projects; 100 Pearl Street, a 17-story office building and parking garage (\$6.0 million); and Goodwin Square, a 32-story office building, hotel and parking garage (\$10.5 million); both located in Hartford, CT.

Additional Construction Projects; Banks - \$1.5 million, Hospitals - \$1.0 million, Commercial Office Buildings - \$1.3 million and Misc. Projects - \$1.0 million.

Additional Engineering Projects; Projects included the design of public housing projects, commercial and institutional facilities, including parking structures, office buildings, nursing homes, and federal prison housing; prepared property evaluations including budget estimates for building owners and property managers; and the supervision of numerous mechanical and electrical renovation projects.

Verizon Wireless; wireless facility planning/design and engineering support services including: co-location projects, water tanks, chimneys, rooftop facilities, structural feasibility studies, tower analysis, survey support and easement resolution, siting council support and easement resolution, siting council support, and professional testimony.

Sprint PCS; wireless facility planning/design and engineering support services including: co-location projects, water tanks chimneys, rooftop facilities, structural feasibility studies, tower analysis, survey support and easement resolution, siting council and zoning support, geotechnical reports and professional testimony.

AT&T Wireless Services; wireless facility planning/design and engineering support services including : co-location projects, water tanks, chimneys, rooftops, structural feasibility studies, tower analysis, survey support and easement resolution, siting council support, environmental studies, geotechnical reports, and professional testimony.

Cingular; wireless facility design and engineering support services including rooftop facilities, co-location projects and tower location surveys.

EDUCATION

B.S., Civil Engineering, University of New Haven, West Haven, Connecticut

REGISTRATIONS AND MEMBERSHIPS

- Professional Engineer; Connecticut, New York, Massachusetts Rhode Island, and Vermont, Pennsylvania, Virginia.
- National Council of Examiners for Engineering & Surveying (NCEES)
- National Society of Professional Engineers (NSPE)
- American Institute of Steel Construction (AISC)
- American Concrete Institute (ACI)

WORK EXPERIENCE

Centek Engineering, Inc. – Senior Project Manager, Structural (Since 1997); Structural Engineer/Project Manager providing consulting services for public housing projects; commercial, manufacturing and institutional facilities; and the design of wireless telecommunications facilities. Responsible for the solution of engineering problems. Determining of program objectives and requirements, organizing programs and projects, and developing standards and guides, team building, quality assurance and control for diverse engineering activities. Guidance is provided to the staff as related to overall objectives, critical issues, design concepts and policy matters.

The Deluca Construction Company; Project Manager (3 years)

Fisher & Salamone, P.C.; Structural Engineer/Project Manager (3 years)

Girard & Company Engineers; Structural Engineer (4 years)

The Fusco Corporation; Project Manager (3 years)

Michael Libertine, LEP
Director of Siting and Permitting
All-Points Technology Corporation, P.C.
3 Saddlebrook Drive, Killingworth, CT 06419
860-663-1697 860-983-5153

General Background

Mr. Libertine has over 22 years of professional experience in the environmental consulting field. His experience includes regulatory compliance and permitting for utility clients involving extensive interactions with the local, state and federal agencies; environmental assessments/impact statements for NEPA compliance; site assessments and field investigations for property transfers; remedial strategy development; environmental due diligence; Brownfields redevelopment projects; and remedial investigations at RCRA facilities as well as state and federally recognized hazardous waste sites. Mike is a Licensed Environmental Professional in Connecticut and has been Project Manager on over 1700 environmental site assessments and field investigations for property transfers throughout New England.

Employment History

Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, Connecticut

- Director, Environmental Services May 1997 to January 2012

Atlantic Environmental Services, Inc./GEI Consultants, Colchester, Connecticut

- Project Manager/Team Leader, January 1991 to May 1997

Key Projects

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY

Program Manager for environmental due diligence, siting and permitting services in support of various telecommunications clients throughout New England and New York. Mike has worked directly for licensed wireless service providers and tower management firms since 1997. Representative project-related services include due diligence and land use evaluations; preliminary site screenings; preparation of compliance documentation, environmental assessments and Memorandums of Agreement to fulfill NEPA requirements; Phase I ESAs and Phase II field investigations; remedial planning and oversight; wetland assessments; vegetative/biological surveys; noise analyses; visibility analyses; graphic support; preparation of regulatory permit applications, and construction support. Mr. Libertine has testified on behalf of telecommunications clients in front of local municipalities and the Connecticut Siting Council on over 300 applications and petitions.

Environmental Siting and Permitting Services, Electrical Utilities

Program Manager in support of various electrical transmission projects, including assessment and permitting of bulk power substations, transmission line corridors, structures, and underground utility installations in CT and MA. Services include overseeing civil engineering feasibility studies, pre-acquisition due diligence evaluations, natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineations, noise analysis, hazardous waste investigations, site survey, layout and design drawings, landscape architecture, visual analyses, preparation of technical documents, coordination with federal, state and local agencies, regulatory permitting, public outreach, and expert witness testimony. Mike assisted in the siting, design and permitting of five new bulk power substations, the modification of three substations, establishment of multiple transition stations, as well as transmission line corridor studies from 2004 through 2012.

Constructability Review, Greater Springfield Reliability Project, Massachusetts and Connecticut

Project Manager responsible for assessing the environmental and construction feasibility associated with the installation of a new 345-kV overhead transmission line, as well as existing electric distribution and transmission infrastructure upgrades, within approximately 57 miles of existing transmission line right-of-way (ROW) in Massachusetts and Connecticut. Project tasks included assessing the suitability of existing access roads to and within the ROW to determine their viability as construction routes; evaluating new access roads, developing primary access routes, identifying appropriate locations for construction pads at each proposed structure location, developing data collection and management methodologies, and, providing a GIS geo-database and mapping depicting field data. Mike also assisted the client on environmental permitting and compliance-related issues associated with the reconfiguration of three substations along the route, two in MA and one in CT.

Permitting Support Services, Interstate Reliability Project, Connecticut

Project Manager responsible for preparing Location Review documents associated with the Card Street Substation upgrades and overhead transmission line interconnections in Lebanon, Connecticut. Project tasks included evaluations of environmental impacts, including wetland resources and wildlife habitat, roadway improvements, site design, landscaping and visual impacts. Mr. Libertine acted as liaison with local officials during the technical review process and assisted in securing letters of support from the First Selectman, Planning and Zoning and Inland Wetlands Commissions.

Environmental Assessment and Constructability Review, Central Connecticut

Project Manager for natural resources inventory/assessment and construction evaluation along 35 miles of ROW corridor. Environmental tasks included Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessment, inventory of threatened and endangered species and critical habitats, biological surveys, and cover-type mapping. Once existing conditions were documented, a feasibility analysis was conducted to identify environmental and constructability conflicts associated with proposed new line installation and facility upgrades.

Certificates of Environmental Compatibility and Public Need, Electrical Substations, Connecticut

Project Manager in support of Applications to the CSC for the permitting of five new bulk power substations in Killingly, Guilford, Windsor, Waterford and Westport, Connecticut. These projects required extensive coordination of numerous team members, including client's in-house discipline managers and engineers, consultants, legal counsel, staff, and subcontractors. Mike was responsible for overseeing pre-acquisition environmental due diligence services, site survey, site data collection and analysis, site/civil layout, and drafting of municipal documents and the Application to the CSC. Services included conducting natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineation, noise analyses, hazardous waste investigations, site layout and design drawings, landscape architecture, preparation of technical documents, coordination with State and local agencies, and permitting. Mike was also responsible for the preparation of Development and Management Plans to the CSC and providing environmental monitoring for adherence to the CTDEP's General Permit for Construction Activities and environmental requirements set forth in the Client's contract documents and specifications.

Environmental Evaluations and Regulatory Permitting, Wind Farm, Colebrook, Connecticut

Project Manager for environmental considerations associated with the development of Connecticut's first commercial wind farm in northwest Connecticut. Responsibilities included overseeing due diligence, natural resource studies and environmental permitting activities. The 3.2 MW project involved extensive evaluations of wetland and other natural resources, flora and fauna studies, sound studies, flicker analyses, visual evaluations and expert testimony at the local and state level, including multiple public hearings. Mike assisted this client in preparing the Development and Management Plan and pre-construction coordination efforts.

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Education

University of Connecticut, B.S. Natural Resources Management,
December 1990
Stonehill College, B.A. Marketing, May 1981

**Certifications/
Licenses**

Licensed Environmental Professional, State of Connecticut,
LEP No. 345
OSHA Hazardous Waste Operations and Emergency Response
(HAZWOPER) Training (29 CFR 1910.120)

Dean Gustafson
Senior Environmental & Wetland Biologist
Professional Soil Scientist
All-Points Technology Corporation, P.C.
3 Saddlebrook Drive, Killingworth, CT 06419
860-663-1697 860-836-6576

General Background

Mr. Gustafson has over 25 years of professional experience in the environmental consulting field. His experience includes NEPA documentation, wetlands (delineation, evaluation, mitigation design, monitoring, stream restoration, and local, state and federal permitting), water-quality investigations, coastal-zone-management studies, natural-resource and ecological evaluations and rare species investigations. Mr. Gustafson has over 16 years of servicing the telecommunications industry and has been involved in hundreds of NEPA compliance investigations. Mr. Gustafson also has extensive experience with the Connecticut Department of Energy and Environmental Protection Natural Diversity Data Base and has resolved numerous potential rare species conflicts with proposed telecommunication developments. Mr. Gustafson has particular expertise in wetland identification, soil mapping, soil classification, vegetative and hydrology surveys, wetland impact assessment, wetland mitigation design and oversight. In addition, he has extensive experience in local, state, and federal wetland permitting including having worked on over 100 Connecticut Siting Council dockets along with providing expert testimony at Council hearings. Mr. Gustafson has consulted on numerous projects which involve soils related issues such as erosion and sediment control planning, vegetative soil stabilization and storm water management BMP evaluation and selection. He is experienced in vernal pool monitoring and assessment, including identification of a wide variety of native amphibians and reptiles that utilize vernal pool habitats. He has served as the Environmental Compliance Monitor on numerous telecommunication construction projects ensuring the implementation of rare species protection plans, wetland protection plans and monitoring or erosion and sedimentation controls.

Employment History

Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, Connecticut

- Natural Resource Group Leader 1997 to 2012

Atlantic Environmental Services, Inc./GEI Consultants, Colchester, Connecticut

- Senior Project Scientist 1992 to 1997

Soil Science & Environmental Services, Cheshire, Connecticut

- Professional Soil Scientist 1988 to 1992

Key Projects

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY

Task Manager for environmental due diligence and permitting services in support of various telecommunications clients throughout New England and New York. Mr. Gustafson has worked directly with the major licensed PCS carriers since 1997. Projects include due diligence and land use evaluations; preliminary site screenings; preparation of compliance documentation, Environmental Assessments and Memorandums of Agreement to fulfill NEPA requirements; wetland delineation, assessments, and mitigation; local, state and federal wetland permitting; vegetative/biological surveys; rare species investigations; floodplain compliance; preparation of regulatory applications (including SEQRA submissions); permit compliance monitoring; and permitting support. Mr. Gustafson has testified on behalf of telecommunications clients in front of local municipalities and the Connecticut Siting Council on over 100 applications and petitions.

Telecommunications Carrier Wetland Compliance Program

Project Manager for major telecommunications carrier's wetland compliance program. Responsible for wetland delineation, assessment, mitigation and alternatives analysis, habitat evaluations, vernal pool identification and assessment, design review for permit feasibility, and successful permitting of over 100 wireless telecommunications facilities with local wetland/conservation commissions in the Connecticut, Massachusetts, and Rhode Island market areas. Responsible for erosion and sediment control planning and construction monitoring for projects in Connecticut and Massachusetts that represent a potential to impact sensitive wetland resources during construction.

On Call Environmental Services, Town of Manchester, CT

Managed environmental compliance and permitting for the Town of Manchester's Roadway Improvement Project from 2008 to 2011. Identified various environmental constraints including wetlands, floodplains and rare species and assisted engineers in environmentally sensitive designs to minimize impact to resource areas. Prepared and successfully secured wetland, erosion and sedimentation and floodplain permit applications.

Environmental Compliance Monitor, Structure Replacement Project, Montague/Leverett, Massachusetts

Environmental Compliance Monitor in accordance with Massachusetts Department of Environmental Protection 401 Water Quality Certificate permit conditions for 345 kV structure replacement project. Monitoring included installation of wooden timber swamp mats across a 65-acre beaver impoundment for the removal of eight existing wooden structures and replacement with four steel structures. Environmentally sensitive compliance monitoring across this approximate 3,500 linear foot span included monitoring of drilling activities for deep caisson foundations within wetlands including in the middle of the beaver impoundment. The project was completed without a single environmental or permit non-compliance incident.

Connecticut DOT West Haven/Orange Railroad Station, Environmental Assessment

Task manager for assessing natural resources, including wetlands, floodplain, aquatic habitats, and wildlife, associated with a proposed railroad station at one of two possible sites. Prepared technical documents in support of FHA NEPA Compliance including Draft Federal Environmental Assessment/Draft State Environmental Impact Evaluation.

Certificate of Environmental Compatibility and Public Need, Rood Avenue, Windsor, CT

Task Manager responsible for the preparation of environmental sections of a Certificate of Environmental Compatibility and Public Need to the Connecticut Siting Council for the construction of a new substation. The project included the construction of a substation in wooded uplands with direct wetland impacts. Responsibilities included conducting natural resource inventories, wetland delineation, and local and state permit documents and coordination with the U.S. Army Corps of Engineers New England Division. The project also included the successful transplanting of pink lady-slippers (*Cypripedium acaule*).

Environmental Assessment and Constructability Review, Central Connecticut Reliability Project

Project Scientist for natural resources inventory/assessment and construction evaluation along 35 miles of ROW corridor. Environmental tasks included Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessment, inventory of threatened and endangered species and critical habitats, biological surveys, and cover-type mapping. Once existing conditions were documented, a feasibility analysis was conducted to identify environmental and constructability conflicts associated with proposed new line installation and facility upgrades.

Education	B.S. University of Massachusetts, Plant and Soil Sciences, 1988 Graduate coursework, University of New Hampshire
Affiliations	Member, Lebanon Inland Wetlands and Watercourses Commission, since 1995. Member, Connecticut Audubon Society
Registration	Professional Soil Scientist, Society of Soil Scientists of Southern New England, since 1988. Connecticut Association of Wetland Scientists. Association of Massachusetts Wetland Scientists.
Certifications	OSHA Hazardous Water Operations and Emergency Response (HAZWOPER) Training (29 CFR 1910.120)

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY FLORIDA PARTNERS LLC
d/b/a NORTH ATLANTIC TOWERS APPLICATION
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 62-64 CODFISH HILL ROAD IN THE
TOWN OF BETHEL, CONNECTICUT

DOCKET NO. 458

Date: May 26, 2015

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL
FROM APPLICANT FLORIDA TOWER PARTNERS, LLC
d/b/a NORTH ATLANTIC TOWERS**

The Applicant, Florida Tower Partners LLC d/b/a North Atlantic Towers ("Applicant"), submits the following responses to the Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. Were return receipts received for each abutting landowner identified in the application? If not, list the abutters that did not receive notice and describe any additional effort to serve notice. When was the abutter list compiled?

A1 Return receipts were received for all abutting landowners, except the following:

1. **Ryan G. Marcoux and Kelly P. Marcoux;**
2. **Christopher Oberhammer;**
3. **William F. Hayes and Brian F. Hayes, Co-Trustee;**
4. **James A. Barge and Sherie C. Barge;**
5. **Jeffrey A. Pagelson and Renee E. Pagelson; and**
6. **Douglas Summers and Joan F. Summers.**

Second notices were sent via first class mail on April 10, 2015 to each abutting landowner above. The abutter list was compiled on December 23, 2014.

2. Would blasting be required to develop the site?
A2 The Applicant does not anticipate the need to blast in order to construct the Codfish Hill Road Facility. However, a full Geotechnical Survey will be completed following Council approval of this docket and submitted as a part of the Development & Management (“D&M”) Plan.
3. What security measures would be employed to prevent vandalism and unwanted intrusion into the facility?
A3 The compound will be gated and locked. The fence surrounding the compound is a weave chain link fence that prevents climbing.
4. What is the distance, direction and address of the nearest off-site residential dwelling from the proposed sites.
A4 The nearest off-site residence is owned by BFM Limited Partnership and has an address of 74 Codfish Hill Road. That residence is located 495 feet to the south of Site No. 1, and 610 feet to the southeast of Site No. 2.

5. Is it feasible to install a single generator capable of supplying emergency power to multiple carriers? Please explain.

A5 It is possible that a properly sized generator at this site could be shared by two or more wireless carriers. Generally, larger generators will maintain larger fuel tanks resulting in run times comparable to that of a smaller generator.

6. Why was the original lease location, as shown in Application Attachment Q, Exhibit B, abandoned? Would the landowner be willing to locate the tower in this location?

A6 The original lease location was a preliminary location that was established in early negotiations with the landowner. Since the time of those negotiations in 2010, the landowner's development plans fell through and additional locations on the property became available. The Applicant then sought to relocate the Facility on the property to make the best use of the topography and/or natural screening. As an example, Site No. 1 was chosen by the Applicant as it benefits from a higher elevation and greater natural screening than the original site. Site No. 2 was chosen by the Applicant as an alternative to that original location at the request of the Town, and as the original location would have required the removal of a cluster of trees. Site No. 2 sites the Facility in a way so as to use the existing rock outcropping for natural screening and reduces the need for

mature tree removal. (It should be noted that Site No. 2 is much closer to the landowner's own residence than original lease location.) At this time the landowner does not wish to site the Facility in the original lease location on the property.

7. In regards to the Visibility Analysis in Application Attachment I, please provide the following;

a) the Aerial Base maps for both sites depict partial year-round visibility on portions of the open areas on the parcel at 74 Codfish Hill Road. It appears the residence area and side yards also consist of open areas, and if so, would year-round visibility include these areas as well? Please characterize the visibility of both towers from this parcel;

A7(a) Yes, some areas in the northern portion of the 74 Codfish Hill Road parcel have the potential to achieve year-round views of the top of the tower at either site location. The majority of the structure would be shielded by intervening trees at any time of the year. At the time of the balloon floats for the two sites (November and January, respectively), the rear part of the residence at 74 Codfish Hill Road could be seen from Site 1 obscured through trees. At that time, this residence was not visible from the Site 2 location.

b) estimate the number of residences with year-round visibility within 0.75 miles of each site; and

A7(b) Site 1: It is estimated that approximately 25 residential properties within 0.75 mile of Site 1 could have year-round visibility of at least a portion of a tower at this location.

Site 2: It is estimated that approximately 12 residential properties within 0.75 mile of Site 2 could have year-round visibility of at least a portion of a tower at this location.

c) Provide 11x17 copies of the visibility mapping.

A7(c) 11 x 17 copies of the aerial and topographic visibility mapping for Site 1 are provided as Attachment 1.

11 x 17 copies of the aerial and topographic visibility mapping for Site 2 are provided as Attachment 2.

Respectfully Submitted,

**FLORIDA TOWER PARTNERS LLC
d/b/a NORTH ATLANTIC TOWERS**

By:



Julie D. Kohler, Esq.

Rachel A. Schwartzman, Esq.

Cohen and Wolf, P.C.

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Bridgeport, CT 06604

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Fax (203) 394-9901

jkohler@cohenandwolf.com

rschwartzman@cohenandwolf.com

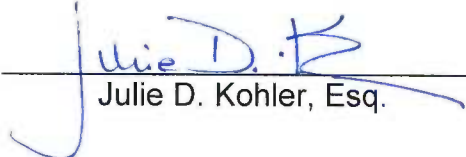
CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by electronic mail and overnight mail to all parties and intervenors of record, as follows:

Daniel M. Laub, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
dlaub@cuddyfeder.com

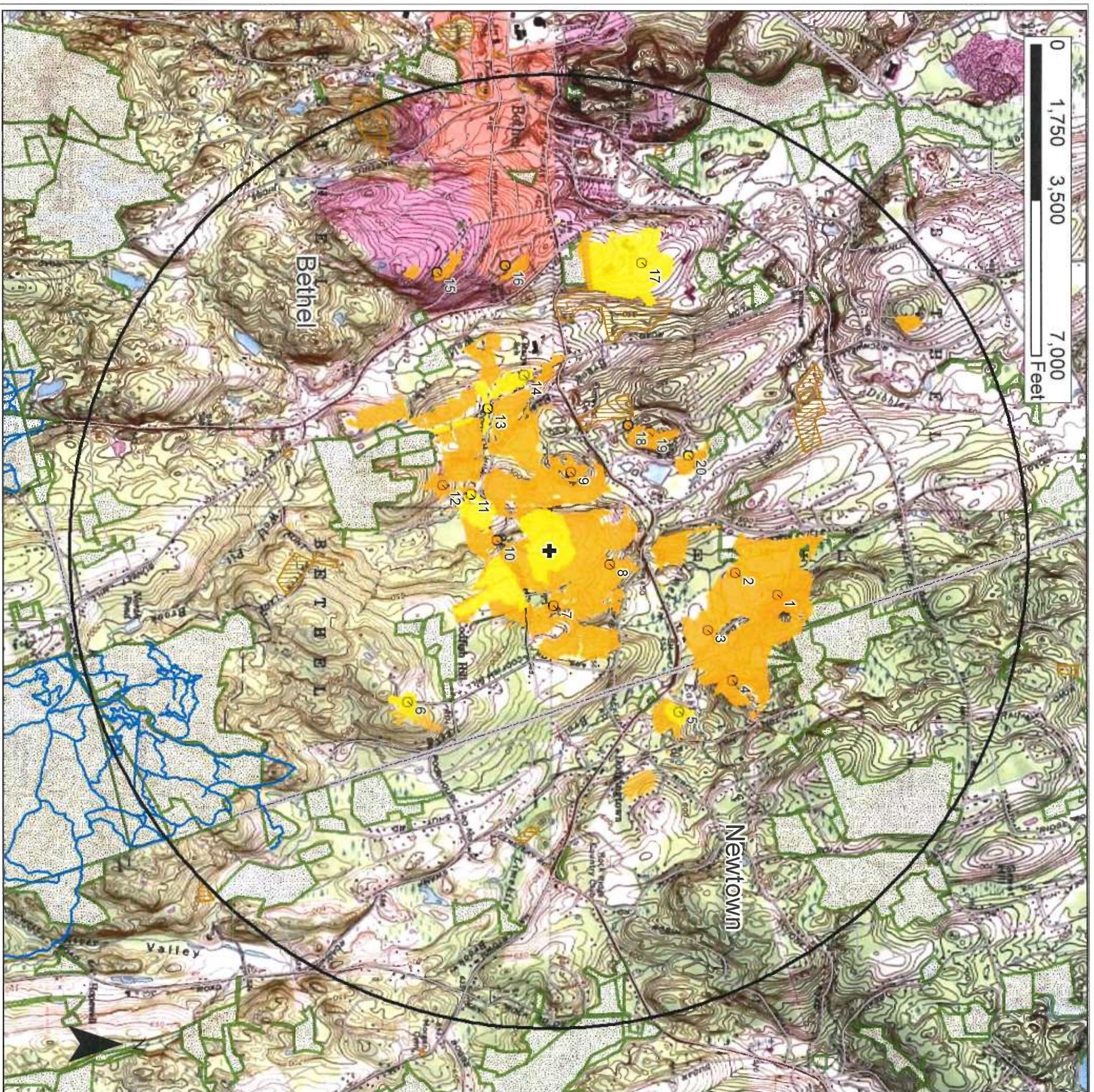
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Evans Feldman & Ainsworth, L.L.C.
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New Haven, CT 06507-1694
krainsworth@EFandA-law.com

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
kbaldwin@rc.com



Julie D. Kohler, Esq.

ATTACHMENT 1



Visibility Analysis – Topo Base

Proposed Wireless Telecommunications Facility
 Bethel CT 1155C – Site 1
 62-64 Codfish Hill Road, Bethel, CT

Proposed facility height is 150 feet AGL.
 Existing tree canopy height estimated as 65 feet.
 Study area encompasses a two-mile radius and includes 8,042 acres of land.

Map compiled 12/3/2013

Map information field verified by APT on 11/30/2013.

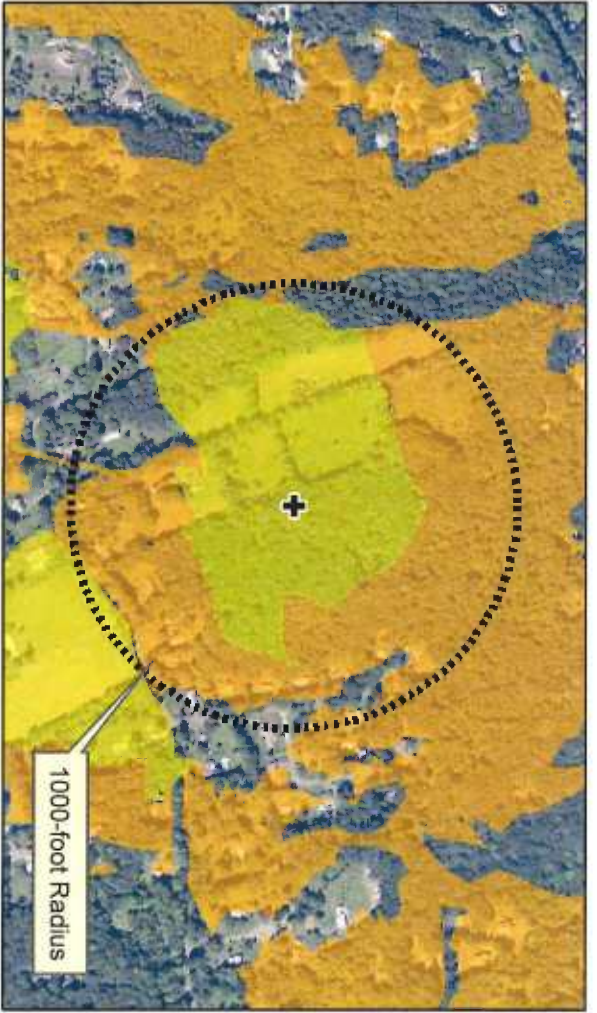
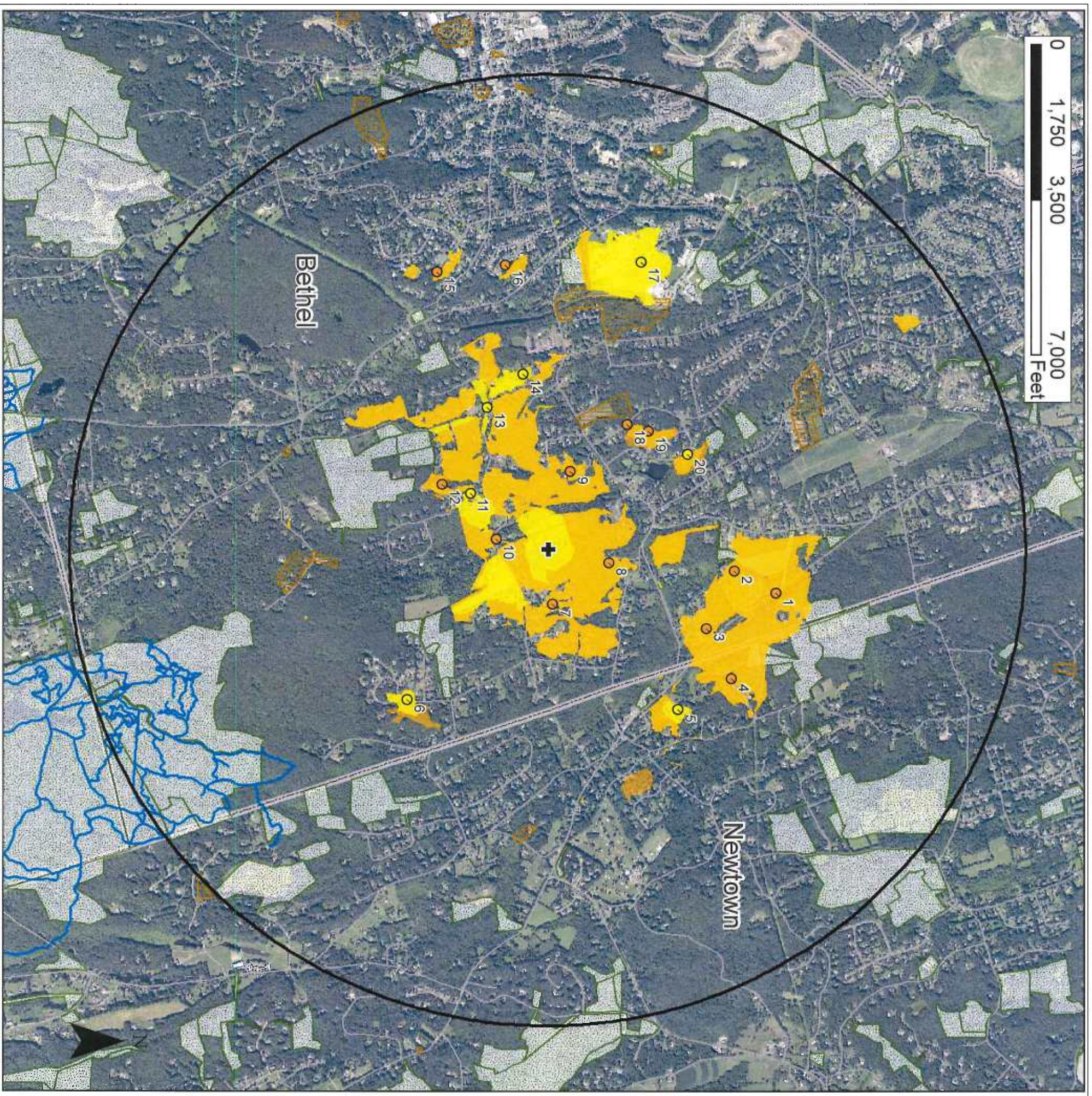
Only those resources located within the extent of the map are depicted. For a complete list of data sources consulted for this analysis, please refer to the Documentation Page.

Legend

- +** Proposed Tower
- Photo Locations
- Seasonal Views
- Year-round Views
- Trails
- Predicted Seasonal Visibility (492 Ac.)
- Predicted Year-Round Visibility (120 Ac.)
- Towns
- 2-Mile Study Area
- Open Space
- Municipal Private Open Space



NORTH ATLANTIC
TOWERS



Visibility Analysis – Aerial Base

Proposed Wireless Telecommunications Facility
 Bethel CT1155C – Site 1
 62-64 Codfish Hill Road, Bethel, CT

Proposed facility height is 150 feet AGL.
 Existing tree canopy height estimated as 65 feet.
 Study area encompasses a two-mile radius and includes 8,042 acres of land.

Map compiled 12/3/2013

Map information field verified by APT on 11/30/2013.

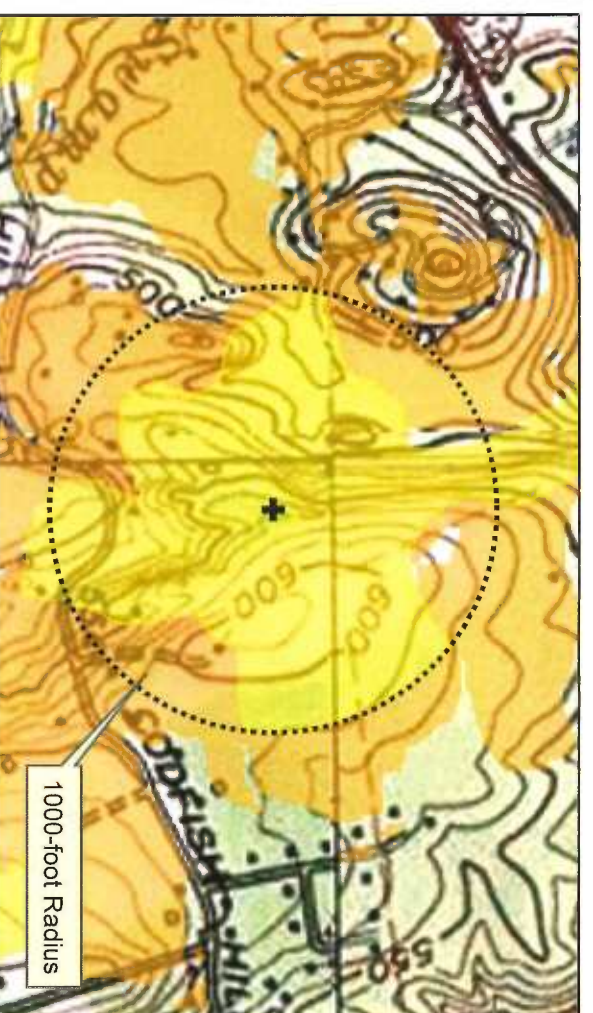
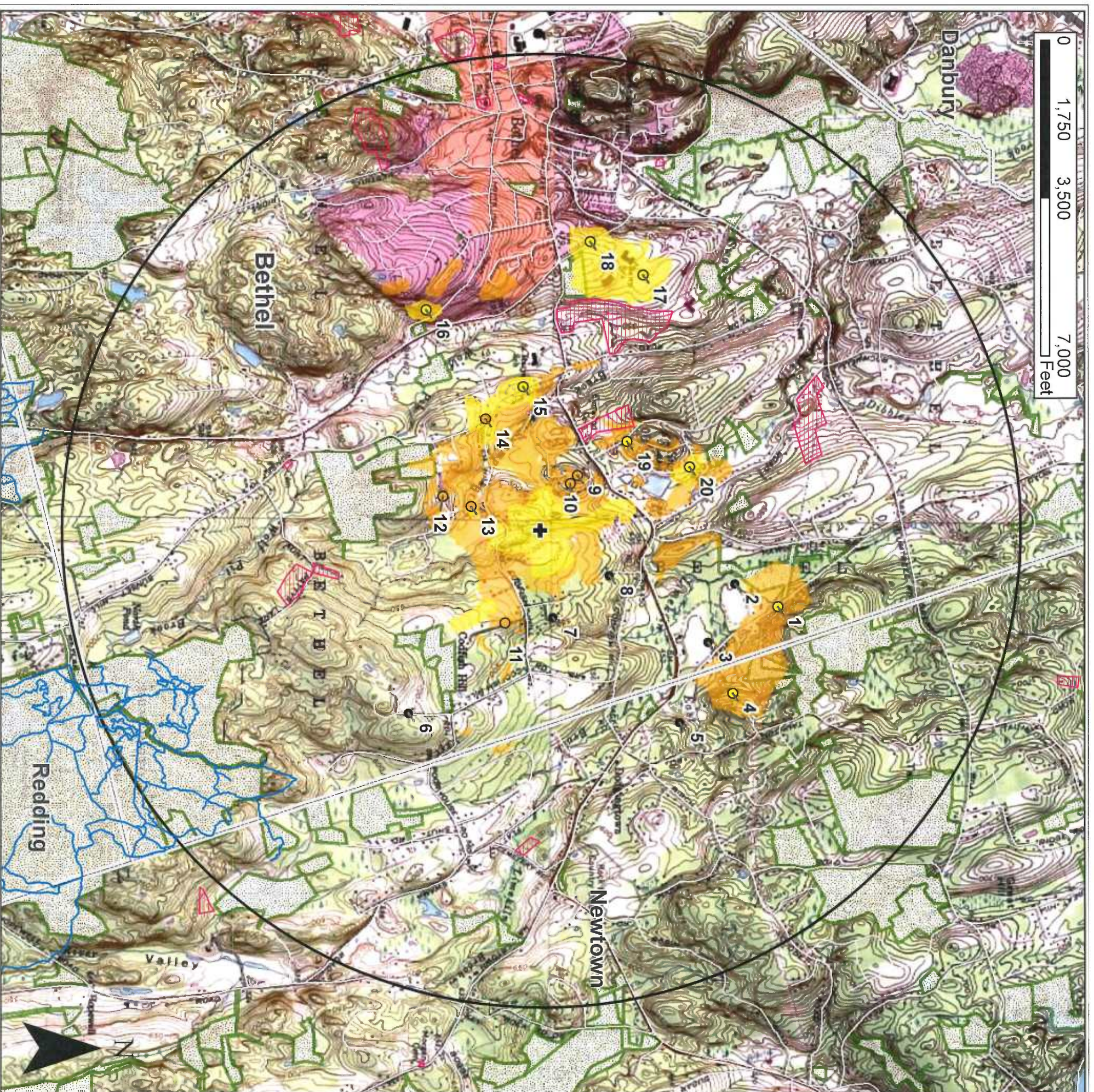
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- Legend**
- +** Proposed Tower
 - Photo Locations
 - Seasonal Views
 - Year-round Views
 - Trails
 - Predicted Seasonal Visibility (492 Ac.)
 - Predicted Year-Round Visibility (120 Ac.)
 - Towns
 - 2-Mile Study Area
 - Open Space
 - Municipal Private Open Space



NORTH ATLANTIC
 TOWERS

ATTACHMENT 2



Visibility Analysis – Topo Base

Proposed Wireless Telecommunications Facility
 Bethel CT 1155C – Site 2
 62-64 Codfish Hill Road, Bethel, CT

Proposed facility height is 170 feet AGL.
 Existing tree canopy height estimated as 65 feet.
 Study area encompasses a two-mile radius and includes 8,042 acres of land.

Map compiled 02/20/2014

Map information field verified by APT on 01/17/2014.

Only those resources located within the extent of the map are depicted. For a complete list of data sources consulted for this analysis, please refer to the Documentation Page.

Legend

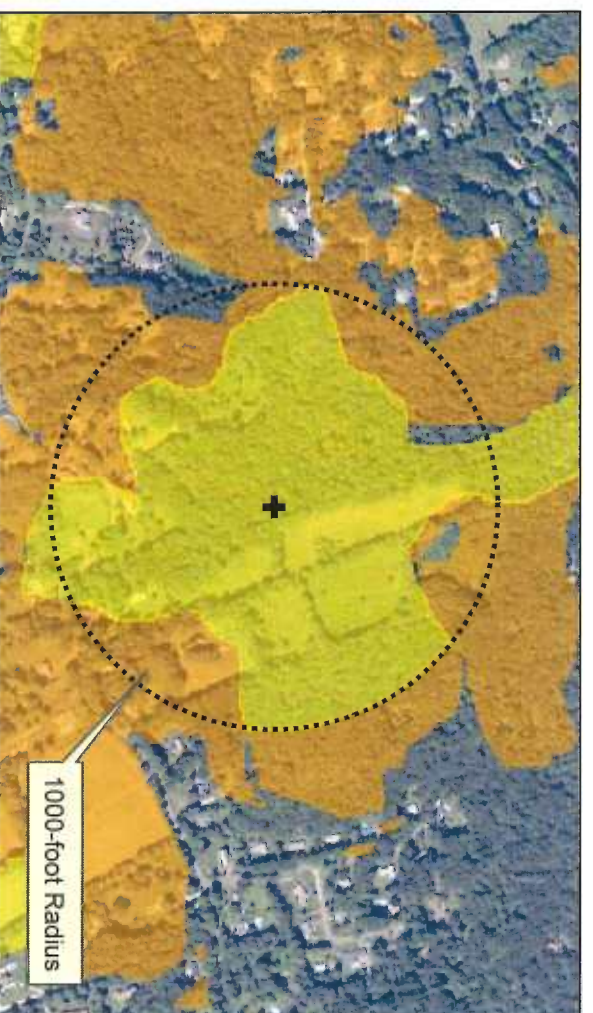
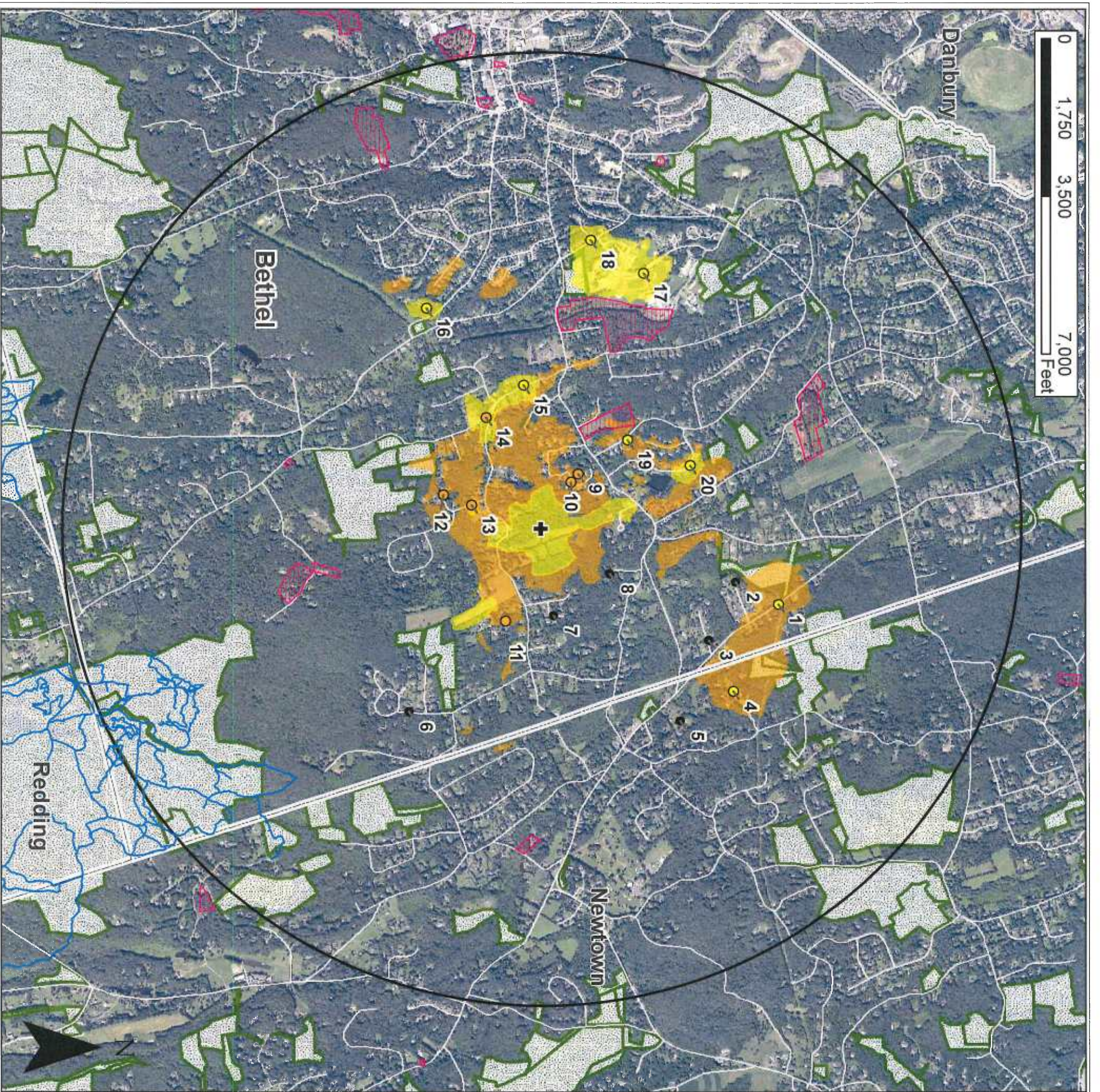
- Proposed Tower
- Photo Locations
- Not Visible
- Seasonal Views
- Year-round Views
- Trails
- Predicted Seasonal Visibility (382 Ac.)
- Predicted Year-Round Visibility (162 Ac.)
- Towns
- 2-Mile Study Area
- Open Space
- Municipal Private Open Space



Location

NORTH ATLANTIC
 TOWERS





Proposed Wireless Telecommunications Facility
 Bethel CT1155C – Site 2
 62-64 Codfish Hill Road, Bethel, CT

Proposed facility height is 170 feet AGL.
 Existing tree canopy height estimated as 65 feet.
 Study area encompasses a two-mile radius and includes 8,042 acres of land.

Map compiled 02/10/2014

Map information field verified by APT on 01/17/2014.

Only those resources located within the extent of the map are depicted. For a complete list of data sources consulted for this analysis, please refer to the Documentation Page.

Legend

- Proposed Tower
- Photo Locations**
- Not Visible
- Seasonal Views
- Year-round Views
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- Predicted Seasonal Visibility (382 Ac.)
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Location

NORTH ATLANTIC
 TOWERS



**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY FLORIDA PARTNERS LLC
d/b/a NORTH ATLANTIC TOWERS APPLICATION
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 62-64 CODFISH HILL ROAD IN THE
TOWN OF BETHEL, CONNECTICUT

DOCKET NO. 458

Date: May 26, 2015

PRE-FILED TESTIMONY OF KEITH COPPINS

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

A1. I am the principal/owner of Phoenix Partnership LLC, and am responsible for the development of new wireless telecommunications sites in Connecticut 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 more than two decades 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.

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 Bethel facility ("Facility").

Q3. What was your role in this Application?

A3. I represent Florida Tower Partners LLC d/b/a North Atlantic Towers in its wireless development projects in the northeast. I was responsible for the site search, site acquisition, coordination with the landowner, and communication with the wireless carriers for this Application.

Q4. Did the Town of Bethel ("Town") request any changes to the proposed Facility design after the Technical Report was filed?

A4. Yes, Attorney Julie Kohler and I met with the First Selectman, Town Planner Steven Palmer and Inlands Wetland Agent Beth Cavagna approximately three weeks after the Technical Report was filed. Mr. Palmer requested that the access road be relocated and we agreed to revise the access road design accordingly.

Q5. Did the Town request any further changes to the Facility design?

A5. Yes, after the December 5, 2013 public information meeting Mr. Palmer sent a letter dated December 16, 2013 requesting that the Facility be more centrally located on the property, citing a plan from April 2011. We took the necessary steps to obtain the rights to provide an alternative site (Site No. 2) located more centrally on the property, in the approximate location identified by the Town.

Q6. Are you aware of any feedback received from the Town as to Site No. 2?

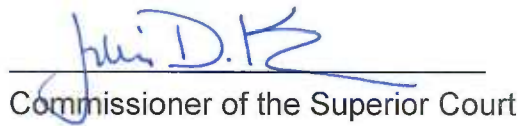
A6. Yes, in a meeting held on January 22, 2015 Mr. Palmer indicated to the Applicant's representative that he was pleased with the location of Site No. 2 and if the Facility were to be located on this property he would support the Site No. 2 location.

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



Keith Coppins

Sworn to and subscribed before me this 26th day of May, 2015



Commissioner of the Superior Court

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

RE: APPLICATION BY FLORIDA PARTNERS LLC
d/b/a NORTH ATLANTIC TOWERS APPLICATION
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 62-64 CODFISH HILL ROAD IN THE
TOWN OF BETHEL, CONNECTICUT

DOCKET NO. 458

Date: May 26, 2015

PRE-FILED TESTIMONY OF MICHAEL LIBERTINE


Q1. Mr. Libertine, are you familiar with the letter dated April 20, 2015 from First Selectman Matt Knickerbocker to the Connecticut Siting Council in opposition to this Application in which the First Selectman asserts that the above referenced property is located in a historic district?

A1. Yes, I have reviewed this correspondence.

Q2. Can you confirm whether the proposed facility will have an impact on historic properties?


A2. Contrary to the information in the First Selectman's letter, the referenced property is not located within a historic district; in fact, no such districts or resources (listed on or eligible for listing on the National Register of Historic Places) are located proximate to the area. Based upon the SHPO determination dated September 8, 2014 (see a copy attached) the proposed facility will not have an impact on historic properties. ("SHPO concurs that no historic properties will be affected by this project.")

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



Michael Libertine

Sworn to and subscribed before me this 26th day of May, 2015



Commissioner of the Superior Court



Department of Economic and
Community Development

Connecticut
still revolutionary

September 8, 2014

Mr. Lucas Karmazinas
FuturePast Preservation
940 West Boulevard
Hartford, CT 06105

Subject: Proposed Telecommunications Facility
62 & 64 Codfish Hill Road
Bethel, CT
North Atlantic Towers

Dear Mr. Karmazinas:

The State Historic Preservation Office is in receipt of the amended proposal for the above-referenced project, submitted for review and comment pursuant to the National Historic Preservation Act and in accordance with Federal Communications Commission regulations.

After completing review, FuturePast Preservation has in their professional opinion stated that there will be no historic properties affected by a new 150' monopole style tower with associated 100' by 100' lease area and an alternative site with a 170' monopole with associated 100' by 100' lease area. While the subject property at 64 Codfish Hill Road, built c. 1768, appears to be eligible for listing as a contributing resource to a National Register of Historic Places district, the surrounding buildings do not support such a designation. Furthermore, SHPO staff concurs with the Office of State Archaeology's opinion that no further archaeological testing of the cell tower corridors are warranted, and the project will have no effect to the state's cultural resources. Based on the information provided to this office, SHPO concurs that no historic properties will be affected by this project.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act and Section 106 of the National Historic Preservation Act. For further information please contact Todd Levine, Environmental Reviewer, at (860) 256-2759 or todd.levine@ct.gov.

Sincerely,

Mary B. Dunne
Deputy State Historic Preservation Officer

State Historic Preservation Office

One Constitution Plaza | Hartford, CT 06103 | P: 860.256.2800 | Cultureandtourism.org

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