

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION OF OPTASITE TOWERS LLC  
AND OMNIPOINT COMMUNICATIONS, INC.  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR  
THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
FACILITY AT 651 PADDOCK AVENUE IN  
CITY OF MERIDEN, CONNECTICUT

DOCKET NO. 329

Date: APRIL 26, 2007

**PRE-FILED TESTIMONY OF DOUGLAS ROBERTS, AIA**

Q1. Mr. Roberts, please state your name and position.

A. Douglas Roberts and I am a Senior Project Manager at URS Corporation ("URS"). URS is located at 500 Enterprise Drive, Rocky Hill, Connecticut. URS is the engineering, architectural and surveying company retained by Optasite Towers LLC ("Optasite") to provide the architecture, engineering and other design services for the proposed telecommunication facility at 651 Paddock Avenue, Meriden ("Facility").

Q2. Please state your qualifications.

A. I attended the University of Bridgeport from 1974 to 1978. I am a licensed architect in the State of Connecticut. I have worked in the field of architecture for 25 years and have been employed by URS for the last 10 years. My expertise includes project management of architectural and engineering designs for over one thousand wireless telecommunications facilities in Connecticut, New York, Massachusetts, Rhode Island, and New Jersey. I have assisted in the

development of and served on the management team for the URS Telecommunications Group in Rocky Hill since its inception in 1997. URS has worked in the development of wireless telecommunication facilities in Connecticut since 1984. I am currently responsible for the development of telecommunications facilities throughout Connecticut and Massachusetts, New York, Rhode Island, and New Jersey.

Q3. Please describe your involvement in this matter.

A. URS was responsible for designing and preparing the site plans for the proposed Facility including the site access plan, compound plan and tower elevation. In addition, URS conducted a tree inventory of the site to determine the number of trees with a diameter of 6 inches or larger that would need to be removed for the construction of the site access driveway and compound.

Q4. Please describe the site.

A. The site is located at 651 Paddock Avenue in Meriden (the "Property"). The Property is located in the S-R Suburban Residential zone and is located on Assessor's Map 0906, Block 098D, Lot 0020-0005. The Property consists of 3.89 acres and is currently used as a church. The rear portion of the Property is undeveloped and backs up to the Merritt Parkway. The leased area is located in the north-central portion of the Property.

Q5. Please describe the access driveway.

A. The access driveway would result in minimal land disturbance and would require minimal tree removal due to the fact that the co-applicants will utilize an existing driveway on the Property. Vehicular access to the Facility would extend from Paddock Avenue along an existing asphalt paved driveway extending in a westerly direction off Paddock Avenue.

Q6. Please describe the proposed Facility.

A. The proposed Facility would consist of a 120-foot stealth monopole, associated equipment compound and access driveway. The compound area is 50 foot by 90 foot and will be fenced in with an 8 foot high security fence and associated gate. The proposed Facility will accommodate antenna arrays (flush mounted) and equipment initially for co-applicant Omnipoint Communications, Inc. ("T-Mobile"). In addition, the proposed Facility is able to accommodate antenna arrays and equipment for three additional carriers.

Q7. How much clearing and grading is necessary?

A. There is approximately 3,900 sq. ft. of clearing required for the compound, access road and grading area. In my opinion this amount of clearing and grading is minimal.

Q8. Please describe the results of the on-site wetlands inspection.

A. At the request of Optasite, URS retained Soil Science and Environmental Services, Inc ("SSES") to conduct a wetlands inspection conducted of the

property located at 651 Paddock Avenue in Meriden, the results of which are found at Exhibit I of the Certificate Application. URS and SSES reviewed the materials provided by Optasite concerning the location of the proposed Facility, access drive and utility easements. SSES then conducted an in-field review of the property to determine the location of wetlands on the property and the impact of the proposed Facility on any wetlands. Based upon SSES' inspection, the nearest wetland is approximately 18 feet of the proposed leased area. In order to protect the wetlands during construction, Optasite will utilize sedimentation erosion control measures which includes the installation of sedimentation erosion control fencing to protect wetland areas from construction activities as well as the implementation of best management practices for the protection of the environment during construction. Erosion control measures will be installed prior to start of any construction and removed upon completion and stabilization of construction. Therefore, the proposed Facility will not directly or indirectly affect any wetlands or watercourses.

Q9. Can the tower be designed with a pre-engineered fault to prevent any possibility of encroachment on adjacent properties?

A. 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.

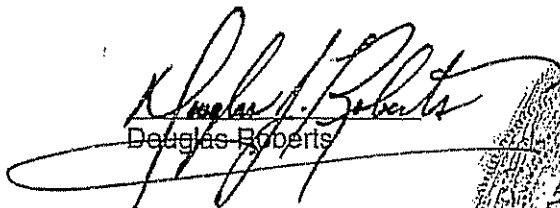
Q10. Are you aware of any other telecommunications facilities in the State of Connecticut that utilized a pre-engineered fault and are similarly located adjacent to a highway?

A. Yes. I was the project engineer for a telecommunications facility constructed by Spectrasite Communications, Inc. at 180-182 Bayberry Lane in Westport.(Council Docket No. 278; See Request for Administrative Notice dated April 27, 2007). As approved and constructed the facility is 140 feet high and located approximately 50 feet from the Merritt Parkway, which is a designated historic roadway . URS designed the tower with a pre-engineered fault at 90 feet in order to prevent encroachment on the Merritt Parkway in the very unlikely event that the tower failed.

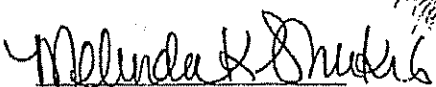
For this site in Meriden, the proposed 120-foot tower is located approximately 109 feet from the Wilbur Cross Parkway much further away from the roadway than the facility in Docket 278. (Of note, the Wilbur Cross Parkway is not a designated historic roadway). Therefore, a pre-engineered fault could be utilized again in order to avoid the 11 foot encroachment that may occur in the very unlikely event that the tower failed.

The statements above are true and complete to the best of my knowledge.

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Date

  
Douglas Roberts

Subscribed and sworn before me this 26<sup>th</sup> day of April, 2007.

By:   
Notary

**MELINDA K. SHUKIS**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES JAN. 31, 2012

