

**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 387 SHORE ROAD IN THE TOWN  
OF OLD LYME, CONNECTICUT

DOCKET NO. 392

Date: January 20, 2010

**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 387 Shore Road, Old Lyme, 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 is 387 Shore Road, Old Lyme, Connecticut (the "Property"). The Property is a 2.11 acre parcel and is designated on the Assessor's Tax Map as Map 10, Lot 8. The Property is zoned for commercial uses. Gregory Benoit owns the Property and currently uses the Property as a Laundromat. T-Mobile would lease a 2,400 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 Shore Road. The access would extend over an existing bituminous driveway and parking area and along an existing dirt road, which T-Mobile would improve.

**Q7. Please describe the proposed Facility.**

A7. The Facility would consist of an 80 foot monopole structure with antenna arrays mounted thereon and related equipment on the ground at the base on a concrete pad. The Facility would consist of an 800 square foot compound, which would sit within the 2,400 square feet leased area. T-Mobile would install panel antennas mounted on T-Arms at 77'9" feet above grade level to the centerline of the antennas. The compound would be enclosed by an eight-foot chain link fence. T-Mobile would extend utility service underground from a new utility pole placed along the existing overhead utility distribution lines along the south side of Shore Road.

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

A8. Yes. T-Mobile would have to remove three trees in connection with the construction, installation and maintenance of the Facility. Two of the trees would be between 8" and 10" in diameter and one tree would be greater than 14" in diameter. See Exhibit M attached to the Application.

**Q9. How much clearing and grading is necessary?**

A9. The Facility compound would require approximately 70 cubic yards of cut and 30 cubic yards of fill. The access would require approximately 10 cubic yards of cut and 10 cubic yards of fill. The utility trench would require approximately 35 cubic yards of cut and 35 cubic yards of fill. In my opinion, with appropriate sedimentation and erosion controls installed, this amount of disturbance would be minimal.

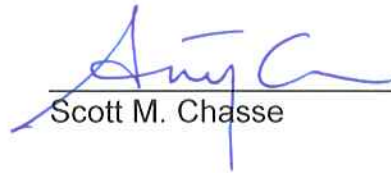
**Q10. Please describe the results of the on-site wetlands inspection.**

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 is a wetland system located approximately 250 feet west of the proposed Facility. This wetland system contains a small pond. There is a larger pond associated with the impoundment of the Threemile River located on the Property approximately 500 feet west of the proposed Facility. T-Mobile would install erosion control measures prior to start of any construction and removed upon completion and stabilization of the construction area. Accordingly, 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  
20th day of January, 2010.

  
\_\_\_\_\_

*Notary Public*  
*My Commission expires*

**ROBIN S. CHASSE**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES JUNE 30, 2014