

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

DOCKET NO. 391

Date: January 26, 2010

PRE-FILED TESTIMONY OF DEAN E. GUSTAFSON

Q1. Please state your name and profession.

A1. Dean E. Gustafson and I am a professional soil scientist and senior wetland scientist for Vanasse Hangen Brustlin, Inc. ("VHB"). VHB is located at 54 Tuttle Place in Middletown, Connecticut.

Q2. What kind of services does VHB provide?

A2. Among many other services, VHB provides a full array of services for the permitting of telecommunications facilities, including wetlands compliance, visual impact analyses and environmental assessments under the National Environmental Policy Act of 1969 (the "NEPA").

Q3. Please summarize your professional background in telecommunications.

A3. I have a B.S. in plant and soil sciences from the University of Massachusetts. I am a professional soil scientist with over twenty-one years of experience in wetlands consulting. My experience includes wetlands delineation, evaluation, mitigation design, monitoring, stream restoration and permitting before local, state and federal bodies. I have a particular expertise in wetland identification, wetland impact assessments, wetland mitigation design and oversight, and soil mapping and classification. I have

provided wetland consultation in connection with more than fifty telecommunications facilities.

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

A4. T-Mobile retained VHB to perform a Visual Resource Evaluation Report, a wetland delineation, a wetlands compliance analysis and a coastal consistency analysis for the proposed telecommunications facility at 232 Shore Road, Old Lyme, Connecticut (the "Facility"). I performed the wetland delineation, wetlands compliance assessment and coastal consistency analysis for the proposed Facility.

Q5. What did you do to determine the existence of wetlands on or near the site of the proposed Facility?

A5. On April 22, 2009, I performed an on-site investigation of the site of the proposed Facility at 232 Shore Road, Old Lyme, Connecticut (the "Property"). I also reviewed the site plans prepared by All-Points Technology Corporation for the proposed Facility. Based upon the on-site investigation and review of the site plans, I completed a wetlands delineation report, which is attached to the Application as Exhibit K.

Q6. Based upon your investigation, are there any wetlands located on the Property?

A6. Yes. There is a wetland system located on the Property to the east of the existing bituminous access ("Wetland 1"). There is another wetland system located approximately 20 feet west of the proposed Facility on the Property ("Wetland 2").

Q7. Please describe the wetland systems located on the Property?

A7. Wetland 1 is located immediately adjacent to the existing bituminous drive that serves the storage facility located on the Property. It is a dug drainage swale and a forested wetland that drain to the south towards Shore Road. Wetland 1 is dominated by red maple in the overstory and highbush blueberry, pepperbush, northern arrowwood and mulitfora rose in the understory. A small dug depression within the wetland located adjacent to the existing access drive forms a small ponding area. This wetland system extends north, south and east off the subject property onto the adjoining property.

Wetland 2 is located nearby to the west of the proposed Facility. It is a large forested wetland stretching across the western property boundary to the southwest corner of the property with the majority of this system located off the Property to the west. Wetland 2 is dominated by red maple, black gum, pepperbush, buttonbush, swamp azalea, highbush blueberry and skunk cabbage. The southwest corner of this wetland system is dominated by a man made pond that drains to the northwest into the main forested wetland system. This pond is located approximately 300 feet south of the proposed Facility.

Q8. Based upon your investigation, are there any wetlands located off the Property but near the site of the proposed Facility?

A8. Yes, the two wetlands identified on the subject property extend onto adjoining properties. Please see response to Question 7 above for further details.

Q9. In your professional opinion, based upon your review of the site plans and the proposed site of the Facility, would the construction, operation and maintenance of the Facility impact any wetland system?

A9. No, the proposed Facility would not result in direct impact to wetland resources. The site of the proposed Facility is immediately adjacent to existing developed and disturbed areas associated with the storage facility on the Property and the Amtrak rail road located adjacent to the Property. In order to avoid temporary impacts to Wetlands 1 and 2, T-Mobile would install a silt fence during construction of the Facility to avoid any temporary impacts. T-Mobile would also stabilize the Facility with loam and a New England Conservation / Wildlife seed mix to avoid any permanent impacts. In addition, a buffer planting of native shrubs would be located along the north, west and south sides of the proposed Facility to enhance the wetland buffer area to Wetland 2. These measures would provide a permanent cover of grasses, forbs, wildflowers, legumes and grasses, and provide food, cover and nesting sites for a variety of wildlife, particularly avian species, which would add wildlife habitat value and good erosion control. This native wetland buffer planting would not require maintenance.

Q10. Based upon your investigation, are there any coastal resources located on or near the Property?

A10. Finally, VHB analyzed whether the Facility would meet the requirements of the Connecticut Coastal Management Act, General Statutes § 22a-90 *et seq.* (the "CMA"). A copy of VHB's report is attached as Exhibit O. Although located within the "coastal boundary," there are no "coastal resources" on the Property. There are no federal or state regulated tidal wetlands or watercourses identified on the Property. The nearest "coastal resources" are tidal wetlands associated with Mile Creek, which is located approximately 800 feet west of the Facility. Accordingly, the Facility would not impact any "coastal resources" and will comply with the requirements of the CMA.

Q11. Would the access or utility routing proposed for the Facility impact any wetland system?

A11. No. The access to the Facility would be along an existing bituminous paved driveway and gravel parking area. T-Mobile would not be improving the access. Additionally, T-Mobile would undertake the protective measures described in the response to Question 9. The location of the utility easements would prevent the utility routing from impacting any wetland system.


Dean E. Gustafson

Sworn and subscribed to before me this
26th day of January, 2010.



Kristine M. Paul

Notary Public

My Commission expires

KRISTINE M. PAUL
NOTARY PUBLIC
MY COMMISSION EXPIRES JAN. 31, 2014