

**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 20, 2010

PRE-FILED TESTIMONY OF MICHAEL CHUN

Q1. Please state your name and profession.

A1. Michael Chun and I am a program director for EBI Consulting ("EBI"). EBI is located at 21 B Street, Burlington, MA, 01803.

Q2. What kind of services does EBI provide?

A2. EBI is a full service environmental, health and safety consulting firm. It provides a wide array of services for those in the telecommunications industry, including 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 biology, with a minor in geology, from Colgate University and a M.A. in energy policy and environmental science, with a concentration in hydrogeology. This degree also included courses in environmental planning and permitting from Tufts University Graduate School. I am working on a Masters in architectural history from Drew University Certificate Program. I have also completed several continuing legal education courses in a variety of topics including surface / groundwater and soil field

sampling, wetlands identification, an introduction to Section 106, and Section 106 and wireless telecommunication towers. I am also certified by the United States Fish and Wildlife Service as a Habitat Evaluation Procedure practitioner.

I have extensive experience in Phase I and II environmental site assessment, NEPA compliance, environmental assessments and remediation consulting services to, among other industries, telecommunication firms. My work with environmental reviews includes analysis of historical properties, wetlands, endangered species habitat, flood plains, and other areas of environmental concerns in relation to proposed and existing telecommunications facilities.

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

A4. T-Mobile retained EBI to perform NEPA compliance for the proposed telecommunications facility at 232 Shore Road, Old Lyme, Connecticut (the "Facility"). I performed the NEPA analysis for the proposed Facility.

Q5. Please describe the results of the NEPA analysis?

A5. The Facility is categorically excluded from any requirement for further environmental review by the Federal Communications Commission ("FCC") in accordance with the NEPA and no permit is required by the FCC prior to construction of the proposed Facility. Please see the NEPA Report attached to the Application as Exhibit Q.

Q6. Is the proposed Facility located in an officially designated wilderness area or wildlife preserve?

A6. No, the Property is not designated as a wilderness area and it is not located in any areas identified as a wildlife preserve or in a U.S. Fish and Wildlife Service National Wildlife Refuge.

Q7. Is the proposed Facility likely to affect threatened or endangered species or designated critical habitats?

A7. No, the Facility would not affect threatened or endangered species or designated critical habitats. The only endangered species located in Old Lyme, Connecticut, is the Piping Plover. The Piping Plover resides along coastal beaches. The proposed Facility would not be situated within the Piping Plover's natural habitat, as the site would be located away from any coastal beaches and in a wooded area. Additionally, the Facility would not be located within an officially designated wilderness area or a designated wildlife preserve. Finally, the proposed tower would not impact migratory bird species since the height is well below 199 feet.

Q8. Is the proposed Facility likely to affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands?

A8. No, the proposed Facility would not affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands.

Q9. Is the proposed Facility likely to affect any districts, sites, buildings, structures, or objects of significance in American history, architecture, archeology, engineering or culture as listed, or potentially eligible for listing in the National Register of Historic Places?

A9. No, the proposed Facility would not impact any recognized districts, sites, buildings, structures or objects of significance in American history, architecture, archeology, engineering or culture as listed on the National Register of Historic Places. In a letter dated December 23, 2008, the State Historic Preservation Officer concluded that the Facility would have no such impact. See the Exhibit O attached to the Application.

Q10. Will the proposed Facility affect any Native American religious sites?

A10. No, EBI consulted with three Native American tribes – the Mashantucket Pequot Tribe, the Mohegan Indian Tribe and the Narragansett Indian Tribe – because they might have had interests impacted by the construction, operation and maintenance of the Facility. All three Tribes confirmed that they did not have any interests that would be impacted by the Facility.

Q11. Will the proposed Facility be located in a floodplain?

A11. No, the proposed Facility would not be located in a 100 year flood plain.

Q12. Will the proposed Facility involve a significant change in surface features (i.e. wetlands, deforestation, water diversion)?

A12. No. There was limited or no hydric vegetation observed at the proposed site of the Facility and no soils were disturbed or compacted.


Michael Chün

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


Notary Public
My Commission expires



DR. JOSEPH Y. BISTRICER
Notary Public, State of New York
No. 01BI6031795
Qualified in New York County
Commission Expires October 12, 2013

State of New York
County of New York
Sworn to before me this
20 day of JAN 2010