

**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. _____

Date: October 13, 2009

**APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

Pursuant to General Statutes § 16-50g *et seq.* and § 16-50j-1 *et seq.* of the Regulations of Connecticut State Agencies, T-Mobile Northeast, LLC, a subsidiary of T-Mobile USA, Inc. d.b.a. T-Mobile ("T-Mobile"), submits this application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a wireless telecommunications facility (the "Facility") at 387 Shore Road in the Town of Old Lyme (the "Application").

I. EXECUTIVE SUMMARY

T-Mobile seeks to construct, maintain and operate a telecommunications facility on property known as 387 Shore Road in Old Lyme (the "Property"). The proposed Facility is a part of a series of facilities T-Mobile is proposing in the State to fill coverage gaps along the Amtrak rail line. The Facility would also provide coverage to Route 156, Connecticut Road, Oak Ridge Drive and Hatchetts Point Road just south of Interstate 95. The Facility would consist of an eighty foot monopole structure with antennas mounted thereon with standoff cross arms and related equipment on the ground nearby.

The Facility would sit within a 2,400 square foot area leased by T-Mobile, located in the southeasterly portion of the Property, which is a 2.11 acre parcel. An eight-foot chain link fence would secure and conceal the equipment at the Facility. Vehicle access to the Facility would extend from Shore Road along an existing paved drive way and across an existing gravel parking lot.

Included in this Application and the exhibits attached hereto are survey-based plans for the proposed Facility, attached hereto as Exhibit B, and other information and reports found detailing the proposed Facility. The reports and supporting documentation included in this Application contain the relevant site specific information required by statute and the Connecticut Siting Council's (the "Council") regulations. Included herein as Exhibit D is a copy of the Council's Community Antenna Television and Telecommunication Facilities Application Guide with references to this Application.

II. BACKGROUND INFORMATION

A. The Applicant

T-Mobile is a limited liability company, organized under the laws of Delaware, with a Connecticut office at 35 Griffin Road South, Bloomfield, Connecticut, 06002.¹ The company and its affiliated entities are licensed by the Federal Communications Commission ("FCC") to construct and operate a personal wireless services system in Connecticut, which has been interpreted as a "cellular system" within the meaning of General Statutes § 16-50i (a) (6). T-Mobile does not conduct any other business in the State of Connecticut other than the provision of cellular services under FCC rules and regulations. T-Mobile is committed to use the proposed Facility.

¹ T-Mobile Northeast, LLC is the successor in interest to Omnipoint Communications, Inc.

Correspondence and/or communications regarding this Application should be addressed to the attorneys for the Applicant:

Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
Telephone: (203) 368-0211
Attention: Julie D. Kohler, Esq.
Monte E. Frank, Esq.
Jesse A. Langer, Esq.

B. Application Fee

The estimated total construction cost for the Facility is \$185,000.00. In accordance with § 16-50v-1a(b) of the Regulations of Connecticut State Agencies, a check made payable to the Council in the amount of \$1,000.00 accompanies this Application.

C. Compliance with General Statute § 16-50/ (c)

T-Mobile is not engaged in generating electric power in the State of Connecticut and, therefore, the proposed Facility is not subject to General Statute § 16-50r. The proposed Facility has not been identified in any annual forecast reports and, therefore, is not subject to General Statute § 16-50/ (c).

III. SERVICE AND NOTICE REQUIRED BY GENERAL STATUTE § 16-50/ (b)

Pursuant to General Statutes § 16-50/ (b), T-Mobile sent copies of this Application to municipal, regional, State, and Federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is attached hereto as Exhibit E. Pursuant to § 16-50/ (b), T-Mobile caused notice of its intent to submit this Application to be published on two occasions in *The New London Day*. A copy of the

legal notice and the publisher's certificate of publication are attached hereto as Exhibit F. In compliance with § 16-50/ (b), notices were sent to each person appearing of record as owner of a property which abuts the Facility. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are included in Exhibit G.

IV. STATEMENT OF NEED AND BENEFIT

A. Statement of Need

In amending the Communications Act of 1934 with the Telecommunications Act of 1996, the United States Congress recognized the important public need for high quality telecommunications services throughout the United States. The purpose of the Telecommunications Act of 1996 was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." H.R. Conf. Rep. No. 104-458, 206, 104th Cong., Sess. 1 (1996). The Telecommunications Act of 1996 expressly preserved State and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of that authority, and preempted State or local regulatory oversight of radio frequency emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In doing so, Congress sought a balance between the public interest in deployment of wireless services and legitimate areas of State and/or local regulatory control over wireless infrastructure.

The Facility is an integral component of T-Mobile's wireless network in the Town of Old Lyme ("Town" or "Old Lyme"). There is a gap in coverage in this area,

specifically along the shore line and the Amtrak rail line, as well as on Route 156, Connecticut Road, Oak Ridge Drive and Hatchetts Point Road just south of Interstate 95. The Facility, in conjunction with other existing and future facilities in Old Lyme and nearby, is necessary for T-Mobile to provide wireless services to this area of the State, including passengers on the Amtrak rail line, and along the shore line.

The propagation plots attached hereto as Exhibit H depict T-Mobile's need for the Facility. Based upon the location of the Facility and the current lack of coverage in this area, T-Mobile cannot readily predict a point in time at which the Facility might reach maximum capacity.

B. Statement of Benefits

T-Mobile is a leading provider of advanced wireless voice and data services throughout the United States. T-Mobile has provided such services in Connecticut since the mid-1990s and remains actively involved in the deployment of state-of-the-art wireless services. In recent years, the public's demand for traditional cellular telephone services has evolved to include expectations of seamless service, wherever the public travels, and readily available access to the internet as well as the ability to send and receive voice, text, image and video through their wireless devices continuously. The ever increasing availability and enhanced sophistication of wireless services has led the public to use their wireless devices as their primary form of communication for both personal and business needs.

To help provide the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the "911 Act"). The purpose of this legislation was to promote public safety through the deployment of a

seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress recognized that networks capable of rapid, efficient deployment of emergency services would enable faster delivery of emergency care, resulting in reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill or injured individuals such as motorists, hikers and boaters.

As an outgrowth of the 911 Act, the FCC mandated that wireless carriers provide enhanced 911 services (“E911”) as part of their communications networks. These services ultimately allow 911 public safety dispatchers to identify a wireless caller’s geographical location within several hundred feet. T-Mobile has deployed and continues to deploy TDOA (“Time Difference of Arrival”) network technology to comply with the FCC E911 requirements. The Facility will become an integral component of T-Mobile’s E911 network in this area of the state, including along the Amtrak rail line, and along the shore line. As other wireless carriers expand their service in Old Lyme through the Facility, E911 services will experience additional improvement.

C. Technological Alternatives

The FCC licenses granted to T-Mobile authorize it to provide cellular and Personal Communication Services (“PCS services”) in this area of the State through deployment of a network of wireless transmitting sites. The Facility is a necessary component of T-Mobile’s wireless network. T-Mobile would engineer the Facility so that it can accommodate additional carriers in the future as necessary.

Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to providing service within the sizeable coverage gap in this area. Terrain variations, topography and tree cover in Old Lyme and the surrounding area, as well as other practical factors limit the use of such technologies and preclude their implementation as alternatives to the proposed Facility. There are no equally effective technological alternatives to construction of a new tower facility for providing reliable personal wireless services in this area of Connecticut.

V. SITE SELECTION AND TOWER SHARING

A. Site Selection

T-Mobile selects a site in an area where there is an existing need or problem regarding coverage or capacity within T-Mobile's network. The site selected is the geographical location where the installation of a telecommunications facility would likely address the identified coverage or capacity issue ("search ring"). T-Mobile conducts a site search with the goal of finding a site that will resolve the coverage or capacity issue and minimize any potential environmental impact.

T-Mobile conducted a site search within this search ring in this area of Old Lyme and has identified the Property as the best possible location to resolve the existing coverage concerns. The nearest telecommunication towers are already in use by T-Mobile. There are no other facilities or structures which T-Mobile could utilize to close the existing coverage gap. The proposed Facility would allow T-Mobile to provide coverage while at the same time minimize any environmental impacts. None of the

other sites reviewed, or any other known and available sites, within the search ring would provide adequate coverage and allow for the same level of mitigation of environmental impacts as would the proposed site for the Facility.

The Site Selection narrative and map of rejected sites and facilities within a four mile radius, attached as Exhibits I and J, provide a complete explanation of T-Mobile's methodology for conducting site searches, the actual search for potential sites in Old Lyme, and depict the locations reviewed during T-Mobile's search and the reasons for elimination from consideration of all but the Property. Due to the nature of development and terrain in the area, the Property is uniquely suited for a telecommunications tower.

T-Mobile is proposing the Facility contemporaneously with two other sites in Old Lyme. By proposing all three facilities at the same time, the Council, the Town, and other stakeholders, can see and evaluate T-Mobile's comprehensive plan to build-out its coverage in Old Lyme, and, particularly, to fill gaps in coverage along the Amtrak rail line and along the shore line.

B. Tower Sharing

T-Mobile will engineer the Facility so that it can accommodate additional carriers in the future as necessary. Municipal public safety antennas also could be accommodated at no cost to the Town. Details of the design are included in Exhibit B. Materials provided by T-Mobile to the Town articulated T-Mobile's willingness to provide, free of charge, space on the proposed monopole for municipal public safety communications antennas.

VI. FACILITY DESIGN

T-Mobile would lease a 2,400 square foot area within the Property, which is an approximately 2.11 acre parcel. The Facility would consist of an eighty foot monopole structure. T-Mobile would install up to three panel antennas per sector (three sectors) at 77'9" above grade level ("AGL") and place its equipment cabinets nearby. The compound would be enclosed by an eight-foot chain link fence. The Facility would be engineered so that it can accommodate carriers in the future. T-Mobile would make space available, free of charge, for municipal public safety communications.

Vehicular access to the Facility would extend from Shore Road over an existing paved driveway and across an existing gravel parking lot. T-Mobile would extend utility service underground from an existing transformer on the Property. Exhibit B contains plans, descriptions, and other relevant information for the Facility. Exhibit K is an inland wetlands inspection report and statement of compliance. Exhibit L is a listing of residential buildings within 1,000 feet of the Facility. Exhibit M is a tree inventory letter. In summary, those exhibits reveal the following:

- The Property is zoned for commercial (C-30);
- The closest wetlands system is approximately 250 feet west of the proposed Facility; the construction, maintenance and operation of the Facility would not have an adverse impact on this wetland system;
- The Property is currently used for a small laundromat;
- Minimal grading would be required for the construction of the Facility;
- The Facility would require the removal or relocation of three trees; and
- The Facility would have no impact on water flow, water quality, or air quality and would comply with relevant noise regulations.

VII. ENVIRONMENTAL COMPATIBILITY

Pursuant to General Statutes § 16-50p, the Council is required to find and to determine as part of the Application process any probable environmental impact of the Facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity and fish and wildlife. As demonstrated in this Application and the accompanying attachments and documentation, the Facility will not have a significant adverse environmental impact.

A. Visual Assessment

The visual impact of the Facility would vary from different locations around the Facility depending upon factors such as vegetation, topography, distance from the Facility, and the location of structures around the Facility. Exhibit N contains a computer-based, predictive viewshed model, which has proven to depict accurately the potential impact of the Facility from surrounding views as well as a Visual Resource Evaluation.

T-Mobile retained visibility experts Vanasse Hangen Brustlin, Inc. ("VHB") to prepare the Visual Resource Evaluation. As part of its study, on May 11, 2009, VHB conducted a balloon float test at eighty feet AGL to evaluate the potential viewshed impacts, if any, associated with the Facility. With the balloon float, VHB sought to determine the visibility impact of the Facility, accounting for local, state and federal historic and recreational sites within the study area, as well as within a two-mile radius of the proposed Site (the "Study Area").

The topography and vegetation contained at the Property and within the Study Area would serve to minimize the potential visual impact of the Facility. The existing

vegetation in the area of the Property is mixed deciduous hardwood species with an average estimated height of sixty feet. This vegetation sits on gently rolling hills that range in ground elevation from approximately sea level to 215 feet AMSL. The tree canopy covers nearly 2,964 acres of the 8,042 acre Study Area — with 3,579 acres consisting of surface water, mainly portions of Long Island Sound.

The Visual Resources Evaluation demonstrates that the Facility would be as inconspicuous as possible. Based on the viewshed analysis contained in Exhibit N, areas from which the Facility would be at least partially visible year round comprise of 679 acres. Most of this acreage (97 percent or 662 acres), however, consists of open water on Long Island Sound. The other areas of visibility are located within the general vicinity of the proposed Facility (within one-quarter to one-half of a mile), including select portions of Shore Road (Route 156) and the existing Amtrak right-of-way. There is some potential for limited visibility within the Point O' Woods residential development to the south and southeast of the Facility. This potential visibility, however, would be attributable to only twelve residential properties located within the Study Area, including four residences along Shore Road located within the immediate vicinity of the Facility, and eight residences located in the Point O' Woods residential development. There would be thirty-one additional acres of property with potential seasonal visibility. These areas would account for approximately fourteen additional residences along Shore Road and within the Point O' Woods residential development.

The Facility would have a *de minimis* visual impact as it would be screened by the proposed fencing and existing vegetation. The Visual Resources Evaluation demonstrates that the Facility would not be obtrusive, even from most of the areas

where the Facility would be partially visible. Accordingly, the proposed Facility would not result in an unacceptable adverse visual impact. Weather permitting, T-Mobile will raise a balloon with a diameter of at least three (3) feet at the Facility on the day of the Council's first hearing session on this Application, or at a time otherwise specified by the Council.

B. Solicitation of State Agency Comments

T-Mobile submitted a request for review and comment for the Facility to the Connecticut State Historic Preservation Officer ("SHPO") and obtained the necessary maps from the database of the Connecticut Department of Environmental Protection ("DEP"). The SHPO has determined that, given the nature of the terrain and soil on the Property, no impact is anticipated. The DEP map reveals that the Facility would be near a wetlands system. Yet, as explained in Part VIII.D., *infra*, the Facility would not have an adverse impact on that wetland system. A copy of the SHPO correspondence and the DEP map regarding the Facility is attached hereto as Exhibit O.

C. MPE Limits/Power Density Analysis

In August 1996, the FCC adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like the Facility proposed in this Application. To ensure compliance with applicable standards, T-Mobile performed maximum power density calculations for the Facility assuming that the antennas were pointed at the base of the tower and all channels were operating simultaneously. The resulting power density for T-Mobile's operations would be approximately 21.3254% of the applicable MPE standards. A copy of the power density calculations and report for the Facility is attached hereto as Exhibit P.

D. Other Environmental Factors

The Facility would be unmanned, requiring infrequent monthly maintenance visits that would last approximately one hour. T-Mobile's equipment at the Facility would be monitored twenty-four hours a day, seven days a week from a remote location. The Facility would not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles would be needed, and the Facility would not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations. The construction and operation of the proposed Facility would have no significant impact on air, water, or noise quality.

T-Mobile retained EBI Consulting ("EBI") to evaluate the Facility in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 (the "NEPA"). A copy of the NEPA Report is attached hereto as Exhibit Q. The site of the Facility 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. The Facility would not affect threatened or endangered species or designated critical habitats. No National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands are located in the vicinity of the Facility. Further, according to the site survey and field investigations, the Facility will not impact any federal or state regulated wetlands or watercourses. In addition, the Facility would not be located within a 100-year or 500-year floodplain. The Facility would also not affect any sites, buildings, structures or objects significant to American history, architecture, culture, archeology or engineering. As such, the Facility is categorically excluded from any requirement for further environmental review by the

FCC in accordance with the NEPA and no permit is required by the FCC prior to construction of the proposed Facility. See 47 C.F.R. §§ 1.1306(b) and 1.1307(a).

Finally, VHB analyzed whether the Facility meets 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 the Threemile River, which is located approximately 500 feet southwest of the Facility across the Amtrak rail line. Accordingly, the Facility will not impact any "coastal resources" and will comply with the requirements of the CMA.

VIII. CONSISTENCY WITH THE OLD LYME LAND USE REGULATIONS

The Facility will be consistent with Old Lyme's Zoning and Wetland Regulations and Plan of Conservation and Development. A description of the zoning classification of the Facility and the planned and existing uses of the Property are also detailed in this section.

A. Old Lyme Plan of Development

The Old Lyme Plan of Conservation and Development (the "Plan"), a copy of which is included in the bulk filing, was adopted on May 11, 2000. The Plan does not address telecommunications. Nevertheless, the construction, maintenance and operation of telecommunications facilities such as the Facility would provide the Town's residents with much needed and much requested wireless communication services.

The Facility would also improve the Town's ability to provide its residents with emergency services. Finally, the Facility would be located in an area zoned for commercial use thereby adhering to the Town's goal to maintain the small town character of Old Lyme.

B. Old Lyme Zoning Regulations

Section 11.22 of the Old Lyme Zoning Regulations addresses telecommunications facilities and sites. "The intent of this section is to provide, to the extent permitted by current law, for the location of wireless telecommunications facilities which shall consist of towers, antennae and accessory telecommunications equipment buildings within the Town of Old Lyme while protecting neighborhoods and minimizing the adverse visual, environmental and operational effects of towers and antennae through careful design, siting and screening. Its purpose is also to provide guidance to the Connecticut Siting Council in its review of wireless telecommunications facilities." See Bulk Filing, Old Lyme Zoning Regs. c. 11, § 11.22.

The Facility would comport with the majority of the general standards for towers under § 11.22.3. The Facility would be engineered to allow for other carriers, thereby adhering to the regulations' emphasis on co-location and tower sharing. See *id.*, c. 11, § 11.22.1 (c) and (h). The Facility also would satisfy the Town's set back requirements except for the rear yard setback. Accordingly, the Facility would be largely consistent with the Town's Zoning Regulations.

C. Planned and Existing Land Uses

The Property is currently used for a small laundromat. T-Mobile is not aware of any future development plans regarding the Property.

D. Old Lyme Inland Wetlands and Watercourses Regulations

The Old Lyme Inland Wetlands and Watercourses Regulations (“Local Wetlands Regulations”) regulate certain activities conducted in or adjacent to “wetlands” as defined therein. One such regulated activity is any “removal or deposition of material, or any obstruction, construction, alteration or pollution” of such wetland and in areas adjacent to a wetland or watercourse. See Bulk Filing, Inland Wetlands and Watercourses Regulations, § 2.1. The Local Wetlands Regulations do define a specific buffer area as a radius of 100 feet from each point on the boundary of a wetland or watercourse.” See *id.*

According to the site survey and field investigations conducted at the Property, there are no watercourses or wetlands located within 100 feet of the Facility. Nevertheless, T-Mobile hired VHB to ascertain whether the proposed Facility would have an adverse impact on those wetlands. VHB concluded that the Facility would have no such impact. In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the Facility.

IX. CONSULTATIONS WITH LOCAL, STATE AND FEDERAL OFFICIALS

A. Local Consultations

General Statutes § 16-50f (e) requires an applicant to consult with the local municipality in which a proposed facility may be located and with any adjoining municipality having a boundary of 2,500 feet from the proposed facility concerning the

proposed and alternate sites of the facility. On May 28, 2009, T-Mobile submitted a technical report to the First Selectman regarding the Facility. The technical report, a copy of which is being bulk filed with this Application, included specifics about the Property, the Facility, the site selection process and the environmental effects of the proposed Facility. The cover letter accompanying the technical report is attached as Exhibit R. T-Mobile met with the First Selectman and the Zoning and Inland Wetlands Enforcement Officer on June 25, 2009, to discuss all three facilities proposed by T-Mobile in Old Lyme.

B. Consultations with State Officials

As noted in Section VII.B., *supra*, of this Application, T-Mobile undertook a consultation with the SHPO and obtained a DEP map from the DEP's database in the course of its NEPA survey. Copies of the correspondence with the SHPO and the DEP map are attached hereto as Exhibit O.

C. Consultation with Federal Agencies

T-Mobile has received a report from Site Safe for the Facility regarding compliance with the regulations promulgated by the Federal Aviation Administration ("FAA"), which is attached hereto as Exhibit S. The results indicate that the Facility would not require FAA registration, let alone FAA review as a potential air navigation obstruction or hazard. Therefore, no FAA lighting or marking would be required for the towers proposed in this Application. T-Mobile will forward copies of the final FAA approval when received.

T-Mobile's FCC license permits it to modify its network by building wireless facilities within its licensed area without prior approval from the FCC provided that a

proposed facility does not fall within one of the “listed” categories requiring review under the NEPA. The “listed” categories, included in 47 C.F.R § 1.1307, are activities that may affect wilderness areas, wilderness preserves, endangered or threatened species, critical habitats, National Register historic districts, sites, buildings, structures or objects, Indian religious sites, flood plains and federal wetlands. The resulting report, attached hereto as Exhibit Q, and discussed in Part II.D., *supra*, confirms that the Property does not fall under any of the NEPA “listed” categories of 47 C.F.R. §1.1307. Therefore, the proposed Facility does not require review by the FCC pursuant to the NEPA.

X. ESTIMATED COST AND SCHEDULE

A. Overall Estimated Cost

The total estimated cost of construction for the facility is \$185,000.00. This estimate includes:

- (1) Tower and foundation costs (including installation) of approximately \$71,000.00;
- (2) Site development costs of approximately \$73,000.00; and
- (3) Utility installation costs of approximately \$41,000.00.

B. Overall Scheduling

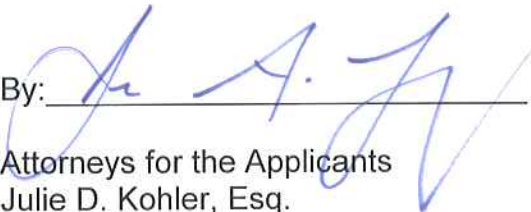
Site preparation and engineering would commence immediately following Council approval of T-Mobile’s Development and Management (“D&M”) Plan and is expected to be completed within four (4) to five (5) weeks. Installation of the monopole structure, antennas and associated equipment is expected to take an additional eight (8) weeks. The duration of the total construction schedule is approximately thirteen (13) weeks.

Facility integration and system testing is expected to require an additional two (2) weeks after the construction is completed.

XI. CONCLUSION

This Application and the accompanying materials and documentation demonstrate that a public need exists in the Town of Old Lyme for improved wireless services, especially along the Amtrak rail line, and that the Facility would not have any substantial adverse environmental effects. T-Mobile therefore respectfully submits that the public need for the Facility outweighs any potential environmental effects resulting from the construction of the Facility, and that the Council should grant a Certificate of Environmental Compatibility and Public Need for the Facility.

Respectfully Submitted,

By: 

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