

**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 MOOSE HILL ROAD IN THE TOWN
OF GUILFORD, CONNECTICUT

DOCKET NO. 417

August 5, 2011
Date: July , 2011

PRE-FILED TESTIMONY OF ASHLEY BONAVENTIA

Q1. Please state your name and profession.

A1. Ashley Bonavenia and I am a program manager 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 ("NEPA").

Q3. Please summarize your professional background in telecommunications.

A3. I have a B.S. in Ocean Engineering from the University of Rhode Island. I have extensive experience in Phase I environmental site assessment, NEPA compliance, environmental assessments, SEQRA reviews and remediation consulting services regarding, among other industries, telecommunications. My work with environmental reviews includes the analysis of historical properties, wetlands, endangered species habitat, flood plains, and other areas of environmental concern 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 on real property known as Map 66, Parcel 64 on the Guilford Assessor's Map and commonly known as Moose Hill Road, Guilford, Connecticut ("Facility"). I performed the NEPA analysis for the proposed Facility.

Q5. Please describe the results of the NEPA analysis?

A5. EBI concluded that the proposed Facility would not impact most of the criteria outlined in the NEPA. EBI, however, recommended that T-Mobile obtain an environmental assessment ("EA") from the Federal Communications Commission ("FCC") regarding the impact of the Facility's proposed access on a nearby wetland system. See Application, Exhibits K, O and Q. T-Mobile has already consulted with the Connecticut Department of Environmental Protection ("CT DEP") and assessed the United States Army Corps of Engineers Programmatic General Permit requirements (the version in effect prior to May 21, 2011). Based upon that consultation and assessment, T-Mobile does not anticipate an adverse impact. See Application, Exhibit K; see also Dean E. Gustafson Pre-Filed Testimony. Additionally, EBI has prepared an EA but cannot submit the EA until T-Mobile obtains a building permit for the Facility. Upon receipt of the building permit for the Facility, EBI would finalize the EA and submit the EA for review by the FCC.

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

A6. No. The real property known as Map 66, Parcel 64 on the Guilford Assessor's Map and commonly known as Moose Hill Road, Guilford, Connecticut ("Property") is not located in a wilderness area and it is not 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 CT DEP reported that the Facility may be located near or within the habitat of an endangered species, the Eastern Box Turtle. T-Mobile retained experts to conduct a survey of the Eastern Box Turtle population in and around the site of the Facility. The survey did not detect any turtles within the vicinity of the proposed Facility. The CT DEP concurred with the results of the survey and stated that T-Mobile should employ standard protocols for the protection of wetlands during the course of construction and that all silt fencing should be removed after soils are stable to avoid restricting reptile and amphibian movement between uplands and wetlands.

The CT DEP provided some guidance to follow if construction should occur between April 1 and November 1, which is the turtles' active period. The CT DEP stated that T-Mobile should take the following steps: (1) apprise the construction crew of the turtles and instruct the crew to search the site each day prior to construction; (2) move any turtles found at the site away from the construction activities; (3) take all

precautions to avoid degradation to wetland habitats including any wet meadows and seasonal pools; (4) perform any work conducted in the aforementioned habitats during the early morning or evening hours occur with special care not to harm basking or foraging turtles; and (5) refrain from parking heavy machinery or vehicles in any habitat. See Application, Exhibits K and Q.

The CT DEP also noted that two other endangered species may reside within the vicinity of the Facility: (1) the black rail and (2) maritime sunflower borer moth. The black rail nests along inland tidal creeks and marshes, in salt marshes, salt hay meadows or along edges of sedges or marsh grass flats from May to August. The maritime sunflower borer moth resides along the edges of salt marshes and is associated with the host plant *Hilleantheous*. The site of the proposed Facility does not consist of the habitats needed for the black rail or the maritime sunflower borer moth and, accordingly, the DEP stated that the proposed Facility would not impact these species adversely. See also Dean E. Gustafson Pre-Filed Testimony.

Accordingly, with the implementation of the CT DEP's guidelines, the proposed Facility would not adversely impact any wildlife.

Q8. Is the proposed Facility designed to minimize any impacts on migratory bird species?

A8. Yes. The design for the Facility would minimize any impact to migratory bird species in accordance with interim (non-binding) guidelines for telecommunications facilities adopted by the United States Fish and Wildlife Service. The Facility would be less than 200 feet in height and would not use guy wires. Additionally, the Facility would not be lighted. See also Dean E. Gustafson Pre-Filed Testimony.

Q9. 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?

A9. 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.

Q10. 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?

A10. 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. On July 26, 2011, T-Mobile conducted an additional balloon float to allow representatives of the State Historic Preservation Office ("SHPO") to confirm the potential visibility, if any, of the proposed Facility from areas of historic interest. On February 16, 2011, SHPO issued a letter indicating that the Facility would not have an adverse impact on the State's historic resources if (1) the monopole is painted medium gray-brown to blend with the bark color of nearby trees; (2) the antennas are installed with flush mounts; and (3) the monopole does not exceed 110 feet. T-Mobile has designed the Facility to comply with these terms. See Application, Exhibits C, O and Q.

Q11. Would the proposed Facility affect any Native American religious sites?

A11. No. EBI also consulted with two Native American Indian tribes – the Mashantucket Pequot Tribe and the Narragansett Indian Tribe – because they might have interests impacted by the proposed Facility. Both Tribes confirmed that they do not have any interests that would be impacted by the Facility. See Exhibit Q.

Q12. Would the proposed Facility be located in a floodplain?

A12. No, the Facility would not be located in a floodplain. See Exhibit Q.

Q13. Would the proposed Facility involve a significant change in surface features (i.e. wetlands, deforestation, water diversion)?

A13. The Facility compound would not adversely impact any wetland system. However, the proposed access would result in a minor disturbance to a wetland system. EBI recommended that T-Mobile obtain an EA from the FCC regarding the impact of the Facility's proposed access on a nearby wetland system. See Application, Exhibits K, O and Q. T-Mobile has already consulted with the CT DEP and assessed the United States Army Corps of Engineers Programmatic General Permit requirements (the version in effect prior to May 21, 2011). Based upon that consultation and assessment, T-Mobile does not anticipate an adverse impact. See Application, Exhibit K; see also Dean E. Gustafson Pre-Filed Testimony.

Additionally, EBI has prepared an EA but cannot submit the EA until T-Mobile obtains a building permit for the Facility. Upon receipt of the building permit for the Facility, EBI would finalize the EA and submit the EA for review by the FCC. See also T-Mobile's Responses to Interrogatories.

Accordingly, the proposed Facility would not result in a significant change to surface features. See Application, Exhibits K and Q; see also Dean E. Gustafson Pre-Filed testimony.


Ashley Bonavenia

Sworn and subscribed to before me this
5th day of ~~July~~, 2011.

AUG.


Notary Public
My Commission expires July 31, 2014

LEE PRESTON
Notary Public, State of New York
No. 4685410
Qualified in Suffolk County
Commission Expires July 31, 20 14