



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 12, 2010

Daniel F. Caruso, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: Wireless Telecommunications Facility
SBA Towers II LLC
East Lyme, Connecticut
Docket No. 396

Dear Chairman Caruso:

Staff of the Office of Long Island Sound Programs (OLISP) have reviewed the *Supplemental Photographic Documentation and Simulations* prepared by Vanasse Hangen Brustlin, Inc. for the above referenced docket and offers the following comments to the Council for your use in this docket.

OLISP appreciates the fact that the supplemental report has been prepared and believes that many of the visual profiles (i.e., view numbers 4, 5, 6, 8, 9, 14 and 15) clearly demonstrate their previous concerns, specifically that the proposed facility would result in an adverse impact on coastal resources as defined in §22a-93(15)(F) of the Connecticut General Statutes: "degrading visual quality through significant alteration of the natural features of vistas and view points."

OLISP acknowledges, as noted in the report, that there are residential (along with some commercial, industrial and railroad transportation) land uses that are visible from various public water areas as noted. However, these do not interrupt "the natural and uninterrupted terrain" and treeline, as do the towers' proposed height, well above treeline. OLISP believes the new photographic documentation effectively demonstrates the adverse visual impacts as outlined in their previous comments.

While residential homes (the primary land use along the water's edge in the area evaluated, relative to commercial use) are visible, they are relatively low-lying at the water's edge, as is the railroad corridor, in relation to the taller trees, tree line and hill tops. The two cell towers' heights are significant and simply observing the photos demonstrate how much they stand out above all else, with only sky as a backdrop, which tends to significantly accentuate the impact.

In fact, several scientific studies have demonstrated that the brain perceives a vertical image of one length as much more dramatic than the same length horizontal image. (Studies to

explain this phenomenon and which outline the vertical-horizontal illusion in greater detail can be found at the following web sites:

www.springerlink.com/index/63545153q572nr75.pdf.

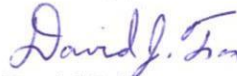
www.conium.org/~wprin2/research/one_Eye.pdf).

The photos also clearly demonstrate the amount of public water area that would have views of the towers, although the study did not include areas from the Pattagansett River in its analysis, which is unfortunate.

In general, OLISP concludes that this report clarifies the adverse visual impact of the proposed tower and emphasizes the scope of the many public areas where it will be notably visible. Therefore as previously suggested, it would be prudent to fully evaluate more alternatives, that would move the location of the tower to a less visible location and/or minimize and mitigate its visual impacts. Additional land parcel analysis could potentially find sites that already have existing tall visual features that have interrupted the tree top terrain.

Thank you for the opportunity to review this report and to submit these comments. If you have any questions regarding these comments, please contact Marcy Balint of OLISP. She may be reached at 860-424-3034 or Marcia.Balint@ct.gov.

Sincerely,



David J. Fox

Senior Environmental Analyst
Office of Environmental Review

cc: Marcy Balint, DEP/OLISP
Robert Hannon, DEP/OPPD