

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
APPLICATION OF HOMELAND TOWERS, LLC
(HOMELAND TOWERS) AND NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A CERTIFICATE
OF ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE AND OPERATION OF A
TELECOMMUNICATIONS TOWER FACILITY IN
RIDGEFIELD, CONNECTICUT

DOCKET NO. 445

June 13, 2014

**HOMELAND TOWERS, LLC and NEW CINGULAR WIRELESS, PCS LLC (AT&T)
PRE-FILED REBUTTAL TESTIMONY OF MR. MICHAEL LIBERTINE**

Annexed hereto is a report dated June 13, 2014 prepared by Mr. Michael Libertine and offered as rebuttal testimony regarding visibility and a monopine tower alternative in Docket No. 445.

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council with a copy to:

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Dated: June 13, 2014



Christopher B. Fisher



MEMORANDUM

To: Christopher B. Fisher
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445 Hamilton Avenue, 14th Floor
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Date: June 13, 2014

From: Michael Libertine

Re: Proposed Homeland Towers Wireless Telecommunication Facility
Connecticut Siting Council Docket 445
Old Stagecoach Road and Aspen Ledges Road
Ridgefield, Connecticut

During the June 3, 2014 Connecticut Siting Council (“Council”) hearing in New Britain, questions were asked about the visibility of the proposed facility from nearby locations in the neighborhood to the north where RACT members live and the potential benefits of incorporating a stealth design (i.e., a monopine). The purpose of this memorandum is to clarify my opinion regarding these questions and my responses to Council cross-examination.

Visibility from Nearby Locations

APT’s October 2013 Visibility Analysis report depicts the viewshed associated with the proposed facility as limited. The majority of views would occur primarily in open areas of the property, adjacent Town-owned land and select distant locations (approximately 0.5 mile or more away). Observations from locations on Old Stagecoach Road and Aspen Ledges Road during two separate balloon floats conducted at the site (July 15 and September 25, 2013) indicate the facility will not be visible from neighboring residential locations to the north and east. Views of the balloon(s) were blocked by the trees along the property borders; the balloons were not visible through or above the tree canopy from locations on these roads (i.e. Old Stagecoach, Aspen Ledges and other roads in the immediate neighborhood to the north/northeast). Intervening trees and vegetation serve to block direct lines of sight from this general area during those times of year when leaves are on the trees. Seasonally, obstructed views of upper portions of the facility will likely be visible through the trees from immediately abutting properties to the north and east, but even with the leaves off the deciduous trees, the density of the trees would obstruct the majority of the facility. On nearby properties farther north and east, where greater separating distances and additional intervening trees occur, any potential views would be further diminished.

In an effort to demonstrate the lack of visibility and any significant adverse visual impact on the immediate neighborhood to the north, APT created three sight-line profiles and provided these to the Council under separate cover as a supplemental submission on June 11, 2014. The profiles

incorporated nearby viewpoints, the proposed site location with a 150-foot tall facility, ground elevations, and trees (using a conservative height of 60 feet). The viewpoints selected included locations on properties abutting to the north (310 Old Stagecoach Road; represented in view line 1) and to the east (2 Aspen Ledges Road; view line 3), as well as at the entrance to the site (view line 2).

These graphics depict direct lines of sight from each viewpoint when looking towards the proposed tower site. For purposes of this analysis, the horizontal field of view was restricted to a 50-foot wide corridor (with the viewer standing in the center) thereby eliminating excessive tree cover and other visual distractions beyond that specific tower representing the general viewshed from each location. Please note that the two locations on private properties have not been field verified.

Results of the sight line graphics are consistent with information provided in the 2013 Visibility Analysis report. Near range views of the facility would be seasonal in nature and extend approximately 500 feet north and east of the property. Limited views of the top portion of the facility may be achievable seasonally when the leaves are down from these locations, but the dense pole timber would effectively screen the majority of the tower. Beyond these immediate near field locations, the combination of topography, tree density and neighboring structures prohibits views along Old Stagecoach Road, Aspen Ledges Road and the surrounding neighborhood year-round.

Potential Benefits of Stealth Design?

With respect to the tower style, discussions at the Council hearing involved consideration of employing stealth design for the tower, specifically a tree tower or monopine. In my opinion, this application does not necessarily warrant use of a monopine. The overall footprint of visibility associated with the proposed facility consists of relatively isolated locations, the majority of which are at distances approaching 0.5 mile and beyond the property. In those areas where the facility may be seen extending above the ridge and tree canopy, a monopine would appear bulkier when compared to a traditional monopole, and may become a more prominent feature on the horizon. This is particularly true for views from Barlow Mountain Elementary School, Seth Low Pierrepoint State Park Reserve, Hobby Drive and Mamasasco Lake. Although views are limited in these areas, the proposed facility would be seen extending above the tree line. A monopine would not achieve the intended purpose of camouflage from those vantage points.

In addition, the site is not the most appropriate setting for a monopine because there is a general lack of coniferous trees at the property, in the surrounding area or on the ridge itself. Nearby locations are not heavily impacted by any direct views during leaf-on conditions. Although it can be argued that a monopine provides some benefit seasonally to immediately nearby locations, when obstructed views may be achieved through the intervening trees, the stark

contrast of a faux conifer among dull-colored deciduous tree species could result in creating a more conspicuous focal point. It is my understanding that the Town Conservation Commission does not favor use of a monopine and has not stated the facility will create adverse scenic impacts on or off-site. Similarly, in recent submissions to the State Historic Preservation Office (“SHPO”) where this style of tower has been proposed, the agency has made its opinion known that it generally does not endorse the use of monopines¹. The SHPO feels that a monopole painted in a neutral color is less intrusive and preferable.

When assessing these factors, it is reasonable to conclude that using a monopine at this location is not only unnecessary but actually may be more noticeable. If the concern is to further minimize potential seasonal views from neighboring locations, the combination of painting the antenna arrays a neutral color (matching the grey color of the monopole, for example) and select plantings along the northern and eastern property boundaries, or on adjacent properties, would be a more effective screening technique. The Conservation Commission has requested Homeland consider plantings along one of the access drives/trails on the property to screen the tower enclosure. Homeland has committed to doing so as part of the Development and Management Plan with input from the Town, should the project be approved by the Council. Adding some similar plantings to the north and east in some capacity on the two abutting property owners’ land could be acceptable to Homeland. I am advised those two property owners would need to consent to a mutually agreeable arrangement as part of resolving RACT’s opposition and that would need to be addressed by counsel for both parties on the specifics of implementation. I offer this option as a more effective solution than a monopine if the concern is views from those two parcels. I believe it would not only adequately serve this purpose but also balance out the potential for more prominent views from distant locations.

¹ In certain cases, the SHPO has made it a condition of its determination not to use a monopine. Note that in this submission, a monopine was not presented as an option to SHPO.