



## COUNCIL ON ENVIRONMENTAL QUALITY

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Executive Director

April 17, 2014

Robert Stein, Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

RE: Docket #445, Proposed Telecommunications Facility at Ledges Road,  
Ridgefield

Dear Chairman Stein:

I am writing in response to the Connecticut Siting Council's solicitation of written comments and consultation regarding Docket #445. The Council on Environmental Quality (CEQ) offers the following comments regarding this application.

**1. There is a need for greater specificity regarding residences that are expected to have a view of the proposed tower.**

The Siting Council's Application Guidelines (G.1) requests that applicants include "residential developments" and "recreational areas" in their "Visibility Analysis".

This application adequately describes the potential impact of the proposed tower on a number of recreational facilities including the boat launching areas at Mamasasco Lake, and at Seth Low Pierrepont State Park. (Views are not expected from either launch.) The application adequately describes which trails will have views. (The tower is expected to be visible from the western most portions of the trails in Seth Low Pierrepont State Park, but not visible from the trails at Kiah's Brook or Ridgebury Slopes.)

The potential visual impact of the tower on residences is not given the same rigorous analysis as are recreational sites. As recently as 2012, applications included the number of residential properties that would have year round visibility and the number that would have seasonal visibility. That precision is absent in this application, which state simply:

*"Locations east of the site within the Old Stagecoach Road/Aspen Ledges Road neighborhood would be effectively screened during "leaf on" conditions by the thick intervening woods and change in topography. Seasonally when the leaves are off the deciduous trees, immediate neighbors may be able to see portions of the tower, but views would still be obstructed. No significant views of the Facility are anticipated from locations further east of*

*the site. Near-range views (within approximately 0.75 mile of the site) would be achieved from select locations along Barlow Mountain Road and Hobby Drive”.*

Use of the Visibility Maps that are included in the applications to determine how many, and which, residences will have year round or seasonal views of a proposed tower is an inferior methodology to a specific count in the application itself. By rough count from the application’s maps. It appears that approximately ten houses will experience year-round views and at least forty will have seasonal views. Specificity from the applicant in this regard would help reviewers weigh the aesthetic scenic impact against public safety and other considerations that are balanced in making a siting decision. Therefore the CEQ recommends a return to the format used in previous years where the number of homes expected to have views was enumerated.

**2. “Leaf-off” photo-simulations are preferred to “leaf-on” simulations.**

The Siting Council’s Application Guidelines (G.4) requests this “when possible”. It might not have been possible to comply with this request in the case of this particular application. Were this the only application to have neglected compliance with this request, its absence would not be a concern. Photo simulations during leaf-on conditions have been included in three of the last four applications reviewed by the CEQ and therefore is worthy of mention. The CEQ recommends that when leaf-on simulations are used, the applicant include the reason for not being able to comply with the Siting Council’s Application Guidelines.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Please note that CEQ member Michael Klemens recused himself from any participation in this matter. Thank you.

Sincerely,



Karl J. Wagener  
Executive Director

CC: Melanie Bachman, Acting Executive Director, Connecticut Siting Council  
Robert Klee, Commissioner of Energy and Environmental Protection

