

12 Stony Hill Drive
Mystic CT 06355-0636
27 November 2007

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CONNECTICUT
SITING COUNCIL

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

Re. Docket #343
237 Sandy Hollow Road
Groton CT 06340

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CONNECTICUT
SITING COUNCIL

Dear Mr. Caruso:

I wish to register my comments with the Siting Council regarding the application filed by MCF Communications bg, Inc. and Omnipoint Communications, Inc. for the construction, maintenance and operation of a telecommunications facility at the above referenced address in Groton CT.

The Council should be concerned with the lackluster effort by the applicant to determine the visual impact of the proposed facility on the nearby residential areas. In the Technical Report

filed with the Town of Groton in September 2006 the applicant's agent, Clough Harbour and Associates stated there would be seasonal visibility to 8 houses. In the pre-filed testimony this number changed to 15 seasonal and 14 year round views. In the testimony given on October 30 the assessment changed again to 22 seasonal and 17 year round views. The applicant has not presented any real evidence to the Council showing which houses on which streets will be visually impacted by the proposed facility. Even though the members of the Council stood on the proposed site on October 30 and could clearly see the nearest residence 165 feet away on Stony Hill Drive the applicant's agent, Rodney Bascom testified that no residence on Stony Hill Drive would have a year round view of the facility. The applicant should be faulted for their inadequate analysis of the visual impact. The Town of Groton has an on-line, scaleable Geographic Information System the applicant should have consulted to provide the Council with an accurate depiction of the surrounding residential neighborhoods to clarify the visual impact. Instead they submitted maps which do not accurately depict the surrounding streets or residences and then provided such a wide spread of numbers that they are rendered meaningless. It is insufficient for the applicant to fall back on the excuse that they lack the

authority to venture onto private property when they made no attempt to secure permission to access the properties to accurately determine the potential seasonal or year round views. It is clear from the evidence and testimony that the applicant did only a cursory, "drive by" analysis and therefore the Council has no meaningful analysis of the visual impact.

Since it is at least clear that the proposed facility is close to residential neighborhoods the Council should mitigate the visual intrusion of the facility by requiring a flagpole design. This would diminish the visual impact and be consistent with the design of the tower T-Mobile currently occupies at 72 Jerry Brown Road in Stonington, CT.

The Council is remiss in not holding the applicant to a higher standard of evidence regarding the use of alternate technologies to meet the coverage gap. When the applicant refers to the coverage gap they repeat the assertion that the gap is along Route 95 and that this is the gap they are trying to fill with the proposed facility. Along Route 95 there is a light pole with both height and power every 150 feet between Exits 88 and 90 (the proposed facility is at Exit 89). The potential utilization of this

existing resource is dismissed by the applicant in both their Technical Report and their Application by simple declaration. The Council should require a more detailed explanation from the applicant on alternative technologies and why these technologies would not meet the coverage need.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "CHARLES E. STEVENS". The signature is written in a cursive style with all letters in uppercase.

Charles E. Stevens