



STATE OF CONNECTICUT

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DATE: October 29, 2008

TO: S. Derek Phelps, Executive Director
Connecticut Siting Council

FROM: Thomas F. Harrison, Chairman

RE: Plainfield Telecommunications Facility (Docket No. 368)



The Council on Environmental Quality has reviewed the application for the proposed tower and offers the following comments.

The tower will be visible year round from portions of Moosup Pond, a scenic setting of residences surrounding a small lake. However, evidence from the balloon floats suggests that the tower is sufficiently distant that it will not dominate the pond.

The most dramatic scenic disruption of this proposed tower is to the relatively even tree lines and ridgelines in the area. Vistas of this sort are every bit as defining of the state's New England character as are the views from ponds and beaches. An out of scale communications tower on a ridge or hilltop detracts from the pleasure of a drive in the Connecticut countryside. Connecticut's rural and wooded landscapes have scenic quality of local, regional, and statewide significance. This truth is obvious at this time of year when weekend roads are filled with drivers out to glimpse the autumn foliage.

The Council therefore asks the question "at what point does a proposed tower's disruption of the landscape rise to the level of aesthetic impact to become cause for rejection of the application?" The Council recommends the creation of a standard that can be applied to answer this question for this docket and future ones.

In this and other applications, one measure of scenic intrusiveness is whether the proposed tower is visible seasonally or year round. This measure addresses only a portion of the issue. Equally important is the degree to which the tower's presence dominates the landscape. An additional rating is needed to score the project on whether it is slightly or moderately or severely visible at those times. This rating would most likely be based on the height above the surrounding scenery, but other factors such as color, camouflage or the degree to which it is silhouetted against the sky would mitigate or exacerbate the rating. Calling attention to the degree of severity of a visual interruption should focus the attention of the applicant's planners on

the importance of visual impacts to tourists and sportsmen, who bring commerce to the state; and to homeowners whose views might be diminished or destroyed by a badly situated tower. In the future, employment of this more rigorous analysis of the scenic impact of siting options before an application is submitted could accelerate the application process and thereby reduce costs to the applicant and the state.

As the Siting Council is aware, the Federal Communications Commission (FCC) provides guidance for applicants to assist them in determining the environmental impact of their proposed sitings. These appear in the application and Commission's rules and include such factors as impacts to: officially designated wilderness areas or wildlife preserves, affects on endangered species and impact on structures or areas that are on the National Register of Historic Places.

The Council would suggest deployment of a list of scenic factors that deserve special consideration in Connecticut, such as:

- Impact on publicly accessed recreation areas
- Impact on tree lines, ridgelines and hilltops
- A rating system for the severity of these impacts to be drawn up by the Siting Council utilizing a simple scale to quantify scenic impacts from slight to moderate to severe.

A similar suggestion was in the Council's comments on the proposed tower in Putnam (Docket 362). There the Council suggested that recreation areas and scenic resources in the state be given special attention in siting decisions. Here we are suggesting that a rating of mild or moderate or severe would assist Siting Council members in evaluating the degree of visual disruption. Because of its location, the proposed tower in Plainfield would be an excellent place to begin a more systematic classification of visual impacts. If successful, a rating system will result in a better outcome and should help to reduce the frequency of applications with truly negative scenic consequences.