

COUNCIL ON ENVIRONMENTAL QUALITY

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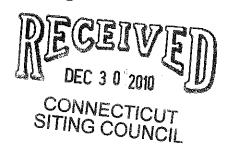
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Karl J. Wagener Executive Director December 16, 2010

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



RE: Docket #407, Proposed Telecommunications Facility at 77-145 Pleasant Point Rd. in Branford

Dear Chairman Caruso:

I am writing in response to the Siting Council's solicitation of written comments and consultation regarding Docket #407. The CEQ offers two recommendations.

1. There is a need for photo simulation of the tower as it will appear from Long Island Sound.

Ninety-one percent of the area that will have year round visibility of the tower is in Long Island Sound. The tower will be very visible from the photo simulations viewpoints (5, 6, 7, and 8) that are closest to the shoreline. The unresolved question is the extent to which distance will diminish the presence of the tower when viewed from off-shore locations, which include the Thimble Islands.

The Long Island Sound is a recreational and scenic resource enjoyed by boaters and sportsmen of many states. Its waters and shoreline are protected under the Connecticut Coastal Management Act (CGS 22a-90). A case like this must surely be the circumstance the Siting Council had in mind in drafting its Application Guideline item **V. G. 5**, which requests "if proposed in close proximity to a shoreline, including lakes and rivers, photographic documentation from open waters, where possible."

2. There are two other areas of scenic and recreational importance in need of special consideration.

The application identifies more than half a mile of Route 146, a state scenic road, as having seasonal views of the proposed tower. It also identifies over a quarter of a mile of the Pine Orchard Trail from which the proposed tower would be visible. This is part of a trail that runs from Hammonasset in Madison all the way to Light

House Point in New Haven. Given the scenic sensitivity of these locations, the CEQ recommends that the Siting Council consider a recommendation that the tower, if approved, utilize the less disruptive, stealth "mono tower" design that has been proposed for locations in Redding and New Canaan (Dockets 404 and 401).

Thank you for consideration of these recommendations. I would be pleased to answer any questions you or your staff may have.

Sincerely,

Karl J. Wagener Executive Director

CC: Amey Marrella, Commissioner of Environmental Protection Linda Roberts, Executive Director, Connecticut Siting Council