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February 11, 2014

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Sabrina Charney-Hull, AICP
Planning Director
Town of New Castle
200 South Greeley Avenue
Chappaqua, NY 10514

RE: Review of Visual Analysis Report:
Homeland Tower Proposed
Telecommunications Facility

Dear Ms. Charney-Hull:

This letter provides my opinion as to the accuracy and adequacy of the Visual Resource Assessment (VRA) produced for the proposed telecommunications facility at 620 Armonk Road dated January 7, 2014.

Technical findings

From a technical perspective the materials found in the Visual Resource Assessment (VRA) for Homeland Tower's proposed telecommunications facility at 620 Armonk Road are very good. The photosimulations use the latest methods, tools and techniques, which are designed to show the project as it would appear to the human eye. The Assessment follows generally accepted professional practice, New York State Department of Environmental Conservation (DEC) guidance, and my letter detailing the Specifications for a Visual Resource Assessment dated July 12, 2012.¹

While the materials found in the VRA are technically very good, I nevertheless encourage you to consider the following observations when using these materials in your decision-making process.

Alternatives

This VRA does not study alternatives to the proposed tower. VRAs often include an evaluation of alternatives, which study the impact of different heights, configurations and/or camouflaging techniques. These are often considered in a VAR if such alternatives are technically feasible or desirable, or if the Town code requires "best available camouflaging technologies." There are many different camouflaging techniques being used today that your Board may want studied. Typically, if alternatives are considered, they would be shown at the same level of

¹ The 2012 specification letter was written for a building, and the VAR made a minor change for a cellular tower, that reduces the study area from three miles to two miles. This is an appropriate change because of the narrow profile of a cell tower.

detail as the proposed action and be evaluated by photosimulation from the same viewpoints.

The VRA conclusions

The Visual Impact Summary on page 12 concludes: “The Project will not create a significant adverse visual impact on the environment, character of the community or visual resources.” These conclusions use criteria promoted by the DEC, quoting a section of the DEC’s *Assessing and Mitigating Visual Impacts*. These criteria are most often used when assessing the impacts on visual resources of statewide significance for the purposes New York State’s State Environmental Quality Review (SEQR) from publicly assessable viewpoints.

At the direction of the Town, however, this VRA is also evaluating views from private property, which are not normally considered under SEQR. Consideration of impacts on private property is normally triggered by a variance and/or special permit required by your zoning. The standards and criteria your Town uses when assessing impacts for local zoning purposes will likely differ from those promoted by the DEC for SEQR purposes. Consequently, you may reasonably disagree with the conclusion that there are no visual impacts, while still continuing to use the visual materials contained in the VRA as evidence in your own decision-making.

One of the reasons we use photosimulations in visual resource assessment is they produce evidence that is easily understood by professional and lay-person alike. They also may be appropriately interpreted differently using different criteria, which may lead to different findings on impacts. This is especially true when evaluating community character or impacts on private property where local standards may be stricter than statewide standards.

Limitations of this review

This is a review of only the materials found within the VRA: it does not include a review of the engineering drawings, or an audit of the base information used in the photosimulation or viewshed mapping. The engineering drawings should be reviewed by the Town to ensure they describe the tower shown in the photosimulation.

Close

The viewshed, base photography, and the photosimulations found in the VRA are really very good, and far exceed the quality of other applications produced by this applicant that I have reviewed elsewhere. I commend Homeland Tower for the steps they have taken to produce higher quality, more accurate materials to describe their projects.

Nevertheless, I encourage the Town to review the evidence in the VRA independent of the conclusions found in the text, using criteria in use locally, especially as it regards impacts on private property required by your local code and community character. If the Town finds that impacts are shown, then consider

asking the applicant to evaluate alternatives that might mitigate those impacts, or to develop an independent mitigation program.

Thank you for the opportunity to comment on this VRA. If you have any questions or comments, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "G. M. Janes". The signature is fluid and cursive, with the first name "George" and last name "Janes" clearly distinguishable.

George M. Janes, AICP
Principal
George M. Janes & Associates