

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE: :
 :
 : DOCKET NO. 510
 :
 NEW CINGULAR WIRELESS PCS, LLC :
 D/B/A AT&T AND TARPON TOWERS II, :
 LLC APPLICATION FOR A CERTIFICATE :
 OF ENVIRONMENTAL COMPATIBILITY :
 AND PUBLIC NEED FOR THE :
 CONSTRUCTION, MAINTENANCE AND :
 OPERATION OF A :
 TELECOMMUNICATIONS FACILITY : August 1, 2022
 LOCATED AT 92 GREENS FARMS ROAD,
 WESTPORT, CONNECTICUT

**NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T AND TARPON
TOWERS II, LLC RESPONSES TO CONNECTICUT SITING COUNCIL
PRE-HEARING INTERROGATORIES DATED JULY 8, 2022**

General

1. Referring to Application Exhibit D, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Describe any additional attempts to contact those property owners.

Response:

See summary of all notices sent to and received by abutting property owners attached as Exhibit 1.

2. Pursuant to CGS §16-50o, please submit a copy of the unredacted lease for the proposed site.

Response:

See the following unredacted documents attached as Exhibit 2, filed under seal:

- i) **Option and Land Lease Agreement dated as of September 17, 2013, between Florida Tower Partners, LLC (Tarpon's predecessor in interest) and Pradiv and Sharuna Mahesh**
- ii) **First Amendment to Option and Lease Agreement between Florida Tower Partners, LLC (Tarpon's predecessor in interest) and Pradiv and Sharuna Mahesh dated as of July 21, 2016**
- iii) **Second Amendment to Option and Lease Agreement between Tarpon and Pradiv and Sharuna Mahesh dated as of May 5, 2020**
- iv) **Notice: Exercise of Option and Rent Commencement dated April 5, 2022**

3. Referring to Application p. 46, how is the construction cost of the facility recovered for both Tarpon and AT&T?

Response:

Tarpon Towers II, LLC ("Tarpon") recovers its construction costs through its leases with the telecommunications carriers.

4. Referring to Application p. 43, how many residents attended the February 8, 2022, public information meeting? What concerns were raised by residents and town officials and how were these concerns addressed?

Response:

It is unknown how many residents attended the February 8, 2022 public information meeting, but approximately 10 residents spoke. At the meeting, the Westport First Selectwoman acknowledged that there were coverage gaps in the neighborhood, but that the Town was concerned about the siting of the tower on a residential lot. Other residents who spoke at the meeting, expressed concerns as to: siting a tower at that location, whether the tower was intended to benefit drivers on I-95 rather than Westport residents, whether there was a need for a tower, whether the need for a tower could be eliminated by boosting the signal strength of existing towers, concerns about the visibility of the new tower, concerns about health impacts resulting from exposure to a new tower, concerns about proximity to Saugatuck Elementary School and the Children's Community Daycare Center, concerns about the impact on property values, and whether alternative sites were being evaluated.

One resident expressed, to the contrary, that she was in favor of the project because service at her home was spotty, and she was concerned that without reliable cell phone service she would have no means of communication in the event of an emergency. She also expressed that the proposed site was not in wetlands and was close to I-95.

With respect to the need for the Facility, in the Application, the applicants have explained why this tower is in fact needed, including the coverage benefits to the proposed tower for Westport residents as well as the I-95 corridor. (See Exhibit E to Application).

With respect to the issue of visibility, the Applicants submitted a visibility analysis in the Application, and will work with the Siting Council and the Town to employ mitigation measures if necessary. (See Exhibit H to Application).

With respect to concerns about health impacts, at the meeting, AT&T representatives explained that the project will meet the conservative radiofrequency emission standards set by federal law. In addition, the Applicants submitted a Calculated Radio Frequency Exposure Report with the Application demonstrating that the Facility easily meets federal standards. (See Exhibit J to the Application).

In Exhibit Q to the Application, the Applicants show that the Saugatuck Elementary School is 1.32 miles away from the proposed tower, and the Children's Community Daycare Center is 0.23 miles away from the proposed tower, which is further away than certain alternative sites suggested by the Town, including 55 Greens Farms Road.

Concerns about property values were not addressed, because that is not a relevant criterion in the siting of this Facility.

With respect to examining alternative sites, at the meeting Tarpon representatives explained that the applicants had been working collaboratively with the Town for many months to explore all potential alternatives, and would continue to do so. And following the meeting, the applicants continued to evaluate every potential alternative location suggested by the Town, and only filed the Application when they had concluded that the proposed site at 92 Greens Farms Road was the only available location that could meet the carriers' coverage and service objectives. (See Site Search Summary attached as Exhibit F to Application).

Site Search

5. When did AT&T commence a site search for the proposed service area? Identify the approximate center and radius of AT&T's site search area.

Response:

The search ring was established in December of 2018. The approximate center of the search ring was 57 Greens Farms Road, Westport, CT, and the radius of the site search area was approximately .25 miles.

6. When did Tarpon commence a site search in the proposed service area?

Response:

Tarpon commenced a site search for the proposed service area in 2011, and after a hiatus renewed the site search in 2020.

7. Referring to Application Exhibit F Site Search Summary, it states Location 4 (300 Sherwood Island Connector) and Location 10 (200 Nyala Farms) were rejected by AT&T's RF engineers. What heights were modeled at these locations?

Response:

Both of these alternative locations were modeled at 120' AGL, the proposed tower height.

8. Referring to Application Exhibit F Site Search Summary, please provide the distances of the other 9 sites investigated from the proposed site.

Response:

The distances of the other 9 sites investigated from the proposed site are as follows:

**Site 2 – 0.04 Miles
Site 3 – 0.22 Miles
Site 4 – 0.62 Miles
Site 5 – 0.13 Miles
Site 6 – 0.14 Miles
Site 7 – 0.84 Miles
Site 8 – 0.47 Miles
Site 9 – 0.10 Miles
Site 10 – 0.67 Miles**

Site/Tower

9. What is the distance from the proposed tower center to the residence on the host property?

Response:

Approximately 145 feet.

10. What is the distance from the proposed tower center to the shoulder/curb of Interstate 95?

Response:

Approximately 118 feet.

11. Is the tower being designed with a yield point?

Response:

The tower can be designed with a yield point if required by the Connecticut Siting Council.

12. How many residences are located within a 1,000-foot radius of the proposed site?

Response:

There are 67 residences within a 1,000-foot radius of the proposed site, including the host property residence.

13. Would any blasting be required to develop the site?

Response:

No. The Applicants do not anticipate that any blasting will be required to develop the site.

14. Would the tower be designed for EIA/TIA-222 structural standards version G, H, or both?

Response:

The tower would be designed to meet the Connecticut State Building Code. As of the present date, TIA-222G is in effect. The tower will also be designed to meet TIA-222H.

15. What is the maximum wind speed tolerance for antennas & microwave dishes on the proposed monopole?

Response:

The maximum wind speed tolerance for antennas is 60 mph. Microwave dishes are not being proposed on this tower.

16. What type of antenna mount will be used for the proposed antennas? What is the structural design standard applicable to such antenna mount?

Response:

T-Arm antenna mounts will be used for the proposed antennas. The structural design standard applicable to the T-Arm mounts is TIA-222-G as per the 2018 Connecticut State Building Code and 2015 International Building Code.

17. Referencing page 35 of the Application, during the municipal consultation, did the Town suggest any camouflage designs or paint colors for the proposed tower?

Response:

No. However, the Applicants remain willing to work with the Town to identify camouflage designs or preferred paint colors for the proposed tower.

18. Would the tower and foundation be designed to accommodate an increase in tower height?

Response:

Yes, the tower and foundation will be designed to accommodate an increase in height up to an additional 30 feet.

19. What would be the design of the fence?

Response:

The compound will have an 8' high chain link security fence along its perimeter.

20. Referencing Application Exhibit L, the Wetland Inspection map indicates a 20-foot wide access and utility easement. However, the rest of the application indicates a proposed 25-foot wide access easement. Please clarify.

Response:

The access and utility easement as currently proposed is 25-feet wide. The Wetland Inspection Report, which contains the referenced map depicting a 20-foot-wide access and utility easement, was issued prior to the change to 25 feet.

21. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)

Response:

The compound will be designed with an 8' tall chain link fence, 9 gage, with a 2" diamond wire mesh surrounding the compound. In addition, there will be a 14' wide gate for access to the compound fabricated utilizing a similar design. The gate will have a combination lock on it to restrict unauthorized access to the compound.

22. Pursuant to CGS §16-50p(a)(3)(G), identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

Response:

The proposed project will be designed and constructed using the latest Connecticut State Building Code, OSHA requirements, as well as any local safety requirements.

23. Has the host municipality or any other entity expressed an interest in co-locating emergency services antennas? Have any other wireless carriers {other than Verizon} expressed an interest in co-locating on the proposed facility to date?

Response:

The Town has not expressed an interest in co-locating emergency services antennas as of this date. Tarpon has reached out to the Town about this issue but has not received an indication of interest as of this date. Dish has expressed an interest in co-locating on the proposed facility, but has not yet executed a lease. T-Mobile expressed interest in co-locating on this site several years ago, but they have not responded to Tarpon to indicate whether they have an interest in connection with this project.

24. Does the proposed site contain any Farmland Soils? If so, what acreage of farmland soils would the facility and associated equipment be located on?

Response:

No, the proposed site does not contain any Farmland Soils.

AT&T Coverage/Capacity

25. Provide the number of channels per sector for each antenna system that would be installed on the proposed tower.

Response:

Two (2) 700 MHZ channels and one (1) of each: 850 MHZ, PCS, AWS, WCS, & C-Band will be installed per sector for each antenna system.

26. Are all frequencies used to transmit voice and data?

Response:

All of the proposed frequencies are used to transmit voice and data.

27. Would the proposed antennas be capable of offering 5G services? If yes, at what frequencies?

Response:

AT&T delivers two methods of 5G service:

- **AT&T 5G, using low-band spectrum (700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 2300 MHz and 3500 MHz)**
- **AT&T 5G+, which is broadband 5G delivered via millimeter wave spectrum (24 GHz to 39 GHz).**

The antennas that will be installed at the proposed site will support 5G in the low-band spectrum. The antennas that will be initially installed at the proposed site do not support the millimeter wave spectrum where broadband 5G+ operates.

28. Provide coverage models for existing and proposed 1900 MHz, 2100 MHz and 3500 MHz services.

Response:

Please see plots included in Exhibit 28 attached hereto.

29. Can AT&T's coverage objectives be met by installing antennas at a lower tower height? Identify the lowest possible antenna height and describe how this height would affect coverage needs and/or capacity relief within the proposed service area.

Response:

The proposed antenna centerline height of 120' is the lowest height at which AT&T could achieve its wireless service objectives.

AT&T's objective, particularly with respect to FirstNet service, is to maximize the coverage achievable from this site. Any reduction in centerline height would reduce the coverage of the site. Even at the proposed height, the tower would not fill every coverage gap in this area.

Additionally, reducing the overall height of the tower would push the lowest collocator very close to the tree canopy. Therefore, reducing the height of the tower would reduce the coverage achievable by collocators, possibly necessitating the construction of more towers than would be needed if the tower were constructed at the proposed height. This would be contrary to the Siting Council's statutory obligation to minimize the proliferation of towers.

30. Could AT&T's required coverage and capacity needs be met by a series of small cell facilities or a distributed antenna system rather than the proposed macro tower facility?

Response:

As set forth in the Application, DAS systems or small cells are not a practical or feasible alternative for addressing the coverage gap in this area of Westport. The RF maps included in Exhibit E to the Application, and the plots included in Exhibit 28, clearly demonstrate a significant coverage gap in this area of Westport. In addition to providing reliable wireless services to AT&T's customers, the proposed Facility is being built as part of the AT&T's FirstNet public safety network, where wide area coverage is of paramount importance. DAS or small cells cannot technologically provide reliable wireless service to cover this area of need. Small cells and DAS are best suited for specifically defined areas where capacity is necessary, such as more urban environments, shopping malls, stadiums and other densely populated areas.

AT&T deploys small cells where they are appropriate. For example, AT&T does use small cells in Connecticut to provide capacity relief in targeted areas. The Council is referred to PURA Docket No. 18-06-13, which includes over 200 small cells approved and either constructed or planned for deployment in urban/downtown areas and more densely populated areas of the state. This area of Westport does not have the same usage patterns and density like Bridgeport, New Britain, Waterbury, Danbury and New London.

AT&T's objective in proposing this facility is to provide primary coverage to this area. Small cells on utility poles are particularly inappropriate for bringing primary coverage to a wide area with low population density such as Westport. There is no battery backup on small cells, so if small cells were used instead of the proposed tower, the only coverage in this area would be lost in a power outage. Widespread power outages are often the result of major weather events (ice storms, hurricanes, etc.), so the primary coverage is most likely to be lost when it is needed the most.

AT&T small cells are generally limited to PCS and AWS frequencies which further limits coverage and capacity for primary service. If 700 MHz is deployed on utility pole mounted small cells, then only 700 MHz can be deployed and only one of the two available 700 MHz carriers can be deployed due to equipment limitations. This also results in significant reductions in available capacity. In addition, prevailing vehicle speed on I-95 makes frequent and sudden handoffs between small cells difficult and customers more likely to lose their connection.

31. What is the signal strength for which AT&T designs its system? For in-vehicle coverage? For in-building coverage?

Response:

AT&T designs its systems for -83 dBm for high-quality coverage and -93 dBm for adequate coverage. The two thresholds depicted on the plots, -83 dBm and -93 dBm, can be viewed as generally corresponding to in-building and in-vehicle coverage, respectively.

32. What is the existing signal strength within the area AT&T is seeking to cover from this site?

Response:

The existing signal strength is -93 dBm and lower.

33. Does AT&T have any statistics on dropped calls and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?

Response:

High speed data service is by far the driver of AT&T's wireless network buildout. Statistics on dropped calls and ineffective attempts pertain only to voice calls, so they are no longer significant measures of substandard service. Data capacity, as discussed in the response to Question 36, is now the key determinant of quality of service.

34. Provide existing coverage gaps in miles for the proposed frequencies for the nearby portion of the Interstate 95, the Metro North Railroad and the surrounding local roads, the overall existing coverage footprints in square miles and the proposed coverage mileage and square miles as represented in the example below:

Street Name	700 MHz Coverage Gap	1900 MHz Coverage Gap	2100 MHz Coverage Gap
Route 2	2.5 miles	5 miles	4.5 miles
Route 32	1.0 mile	3 miles	2 miles
Route 87	0.5 mile	2.5 miles	1 mile
Interstate 395	2.5 miles	2.5 miles	2.5 miles
State Road Total	6.5 miles	13 miles	10 miles

Overall Coverage Footprint	49 square miles	6 square miles	7.5 square miles
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Response:

Metro-North Railroad:

700 MHz

- **Railroad gap area: 0.5 miles**
- **New Railroad Coverage area: 0.5 miles**

Roads:

700 MHz

- **Road gap area: 1.5 square miles**
- **New coverage: 0.9 square miles**

Road Gap	
Street Name	Length (miles)
Greens Farms Rd	1.4
I 95	0.5
Sherwood Island Rd	0.1
Apple Tree Trl	0.1
Beachside Cmn	0.1
Bluewater HI	0.2
Bluewater HI S	0.1
Bluewater Ln	0.1

Bradley St	0.1
Budner Ln	0.1
Clapboard Hill Rd	0.2
Compo Beach Rd	0.3
Compo Pkwy	0.2
Compo Rd S	0.4
Cuttings Ln	0.2
Danbury Ave	0.1
Dogwood Ln	0.4
Drumlin Rd	0.2
Edgemarth Hill Rd	0.2
Edgewater Commons Ln	0.1
Edgewater Hillside	0.1
Fairfield Ave	0.1
Forest Ln	0.1
Gonczy Rd	0.1
Green Acre Ln	0.3
Grove Pt	0.4
Guyer Rd	0.5
Hale St	0.2
Hales Ct	0.1
Hales Rd	0.2
Herbert Baldwin Ln	0.6
High St	0.2
Hillspoint Rd	0.4
Hillspoint Rd	0.5
Inwood Ln	0.1
Iron Gate Hl	0.1
Jennie Ln	0.3
Lakeview Rd	0.1
Lamplight Ln	0.2
Longshore Rd	0.5
Loretta Ct	0.1
Manitou Rd	0.2
Mayfair Ln	0.1
Mayflower Pkwy	0.4
Meadow Ln	0.1
Medwell Ln	0.1
Millbrook Rd	0.2

Nappa Dr	0.1
Norwalk Ave	0.1
Old Cuttings Ln	0.5
Pond Edge Rd	0.1
Prospect Rd	0.2
Richard Dr	0.1
River Oaks Ln	0.1
River Oaks Rd	0.1
Rocky Ridge Rd	0.2
Round Pond Rd	0.2
Service Road	0.2
Sherwood I Connector	0.1
Sherwood Island Ln	0.2
Sherwood Island Rd	0.1
Sherwood Island Rd	0.4
Signal Ln	0.1
Soundview Dr	0.1
Traffic Circle	0.1
Valley Rd	0.8
Yankee Hill Rd	0.1

New Coverage	
Street Name	New Coverage
I 95	0.4
Greens Farms Rd	0.8
Dogwood Ln	0.3
Drumlin Rd	0.2
Edgemarth Hill Rd	0.2
Edgewater Commons Ln	0.1
Edgewater Hillside	0.1
Gonczy Rd	0.1
Green Acre Ln	0.1
Grove Pt	0.5

Guyer Rd	0.5
Hale St	0.2
Hales Ct	0.2
Hales Rd	0.2
High St	0.2
Hillspoint Rd	0.7
Inwood Ln	0.1
Iron Gate HI	0.1
Jennie Ln	0.1
Lakeview Rd	0.1
Lamplight Ln	0.2
Loretta Ct	0.1
Mayflower Pkwy	0.1
Meadow Ln	0.1
Medwell Ln	0.1
Millbrook Rd	0.2
Nappa Dr	0.1
Pond Edge Rd	0.1
Prospect Rd	0.2
Rocky Ridge Rd	0.2
Sherwood Island Ln	0.1
Sherwood Island Rd	0.4
Valley Rd	0.8

Metro-North Railroad:

PCS 1900 MHz

- **Railroad gap area: 2.2 miles**
- **New Railroad coverage area: 1.7 miles**

Roads:

PCS 1900 MHz

- **Road gap area: 3.9 square miles**
- **New coverage area: 1.6 square miles**

PCS 1900 MHz Gap Roads	
Street Name	Length (miles)
Apple Tree Trl	0.2
Baker Ave	0.2
Beachside Cmn	0.3
Bluewater HI	0.3
Bluewater HI S	0.1
Bluewater Ln	0.1
Boyd Ln	0.1
Bradley St	0.2
Budner Ln	0.1
Buena Vista Dr	0.1
Burnham HI	0.4
Burying Hill Rd	0.2
Center St	0.2
Clapboard Hill Rd	0.3
Compo Beach Rd	0.5
Compo Mill Cv	0.1
Compo Pkwy	0.3
Compo Rd S	1.1
Concord Ln	0.1
Cuttings Ln	0.2
Danbury Ave	0.2
Dogwood Ln	0.6
Drumlin Rd	0.4
Edgemarth Hill Rd	0.3
Edgewater Commons Ln	0.2
Edgewater Hillside	0.2
Elaine Rd	0.1
Ellery Ln	0.3
Fairfield Ave	0.2
Farnham Ct	0.1
Forest Ln	0.1
Franklin Ave	0.1
Gault Ave	0.2
Glen Rd	0.1
Gonczy Rd	0.1
Green Acre Ln	0.4

Greens Farms	
Holw	0.1
Grove Pt	0.5
Guyer Rd	0.5
Hale St	0.2
Hales Ct	0.4
Hales Rd	0.5
Harbor HI	0.1
Harding Ln	0.1
Herbert Baldwin	
Ln	0.9
Hidden HI	0.1
Hideaway Ln	0.1
High St	0.2
Hillside Rd	0.1
Hillspoint Rd	1.8
Horseshoe Ln W	0.2
Imperial Ave	0.6
Inwood Ln	0.1
Iron Gate HI	0.1
Ivanhoe Ln	0.1
Jennie Ln	0.5
Keyser Rd	0.2
Lakeview Rd	0.1
Lamplight Ln	0.2
Laurel Rd	0.1
Lazy Brook Ln	0.1
Longshore Rd	0.6
Longview Rd	0.1
Lookout Ln	0.1
Lookout Trl	0.1
Loretta Ct	0.1
Manitou Rd	0.5
Mansfield Pl	0.1
Maplegrove Ave	0.1
Mayfair Ln	0.1
Mayflower Pkwy	0.5
Meadow Ln	0.1
Medwell Ln	0.1
Millbrook Rd	0.2
Minute Man HI	0.4

Morningside Dr S	0.1
Mortar Rock Rd	0.2
Murvon Ct	0.1
Nappa Dr	0.2
Narrow Rocks Rd	0.3
Norwalk Ave	0.1
Nyala Farms Rd	0.2
Old Cuttings Ln	0.5
Old Mill Rd	0.1
Otter Trl	0.3
Over Rock Ln	0.2
Owenoke Park	0.4
Park Ln	0.2
Pine Dr	0.1
Pond Edge Rd	0.1
Prospect Rd	0.3
Quentin Rd	0.1
Rayfield Rd	0.1
Remlin Ct	0.1
Richard Dr	0.1
Ridge Dr	0.1
River Oaks Ln	0.1
River Oaks Rd	0.3
River View Rd	0.1
Rocky Ridge Rd	0.2
Roosevelt Rd	0.1
Round Pond Rd	0.2
Sandhopper Trl	0.1
Service Road	0.2
Sherwood Dr	0.1
Sherwood Farms	0.1
Sherwood I Connector	0.8
Sherwood Island Ln	0.4
Sherwood Island Rd	1.0
Signal Ln	0.1
Sleigh Rdg	0.1
Smokey Ln	0.1
Soundview Dr	0.3

Summer Hill Rd	0.1
Tierney Ln	0.1
Traffic Circle	0.3
Tranquility Ln	0.1
Valley Rd	0.9
Vani Ct	0.1
Vista Ter	0.2
VI Heights Rd	0.1
Wake Robin Rd	0.3
Westport Ave	0.1
Woodland Dr	0.2
Yankee Hill Rd	0.2

New Coverage 1900 MHz	
Street Name	Length (miles)
Budner Ln	0.1
Buena Vista Dr	0.1
Burnham HI	0.3
Compo Hill Ave	0.1
Compo Mill Cv	0.1
Concord Ln	0.1
Drumlin Rd	0.4
Edgemarth Hill Rd	0.3
Edgewater Commons Ln	0.2
Edgewater Hillside	0.2
Gonczy Rd	0.1
Green Acre Ln	0.1
Greens Farms Holw	0.1
Grove Pt	0.5
Guyer Rd	0.4
Hale St	0.2
Hales Ct	0.3
Hales Rd	0.5
Hideaway Ln	0.1
High St	0.2
Hillside Rd	0.1

Hillspoint Rd	1.5
Inwood Ln	0.1
Iron Gate HI	0.1
Jennie Ln	0.3
Karen Dr	0.1
Lakeview Rd	0.1
Lamplight Ln	0.2
Lookout Ln	0.1
Lookout Trl	0.1
Loretta Ct	0.1
Marion Rd	0.7
Mayflower Pkwy	0.2
Meadow Ln	0.1
Medwell Ln	0.1
Millbrook Rd	0.2
Mortar Rock Rd	0.1
Nappa Dr	0.2
Narrow Rocks Rd	0.2
Old Mill Rd	0.1
Pond Edge Rd	0.1
Prospect Rd	0.3
River Oaks Ln	0.1
River Oaks Rd	0.3
Rocky Ridge Rd	0.2
Sherwood Dr	0.1
Sherwood Farms	0.1
Sherwood Island Ln	0.2
Sherwood Island Rd	0.7
Signal Ln	0.1
Smokey Ln	0.1
Valley Rd	0.9
VI Heights Rd	0.1
Wake Robin Rd	0.3

35. What is AT&T's existing and predicted coverage footprint from the proposed site (in square miles), at each frequency that would be installed?

Response:

Please see the coverage plots included in Exhibit 28. The predicted coverage footprints are as follows:

- **700 MHz New coverage: 0.9 square miles**
- **850 MHz New coverage: 1.5 square miles**
- **1900 MHz PCS New coverage: 1.6 square miles**
- **2100 MHz AWS New coverage: 1.4 square miles**
- **2300 MHz WCS New coverage: 1.2 square miles**
- **3700 MHz C-Band New coverage: 1.1 square miles**

36. What nearby wireless facilities (or sectors) are nearing capacity limits? At what frequencies? Please include a projected exhaustion date for each of these sectors. Would the deployment of the proposed facility be sufficient to address these capacity concerns, or would an additional facility be required in the near term to off-load traffic?

Response:

Since approximately 2021, CT2132 Alpha sector is already at capacity on 700, 1900, 2100, and 2300 MHz. While future traffic patterns can be unpredictable (for example, the COVID-19 pandemic), in addition to adding coverage in the area, we expect this proposed site to offset the capacity needs of CT2132 Alpha in the near term.

37. Once the proposed site is on-line and providing capacity relief to adjacent sites, what would be the effective service area for the 700 MHz frequency? Would parts of overlapping service be handled by the existing sites, thus lessening the effective service area of the proposed site? Please explain.

Response:

The eventual service area of the proposed site (2.4 square miles) is actually greater than the new service area. In areas adjacent to the New Service Area, the proposed site will have stronger coverage than existing sites, thus adding those existing service areas to the service area of the new site and reducing the area the existing sites must serve.

38. Would flush-mounted antennas provide the required coverage? Would the flush-mount configuration result in reduced coverage and/or necessitate greater antenna height with multiple levels of antennas? Explain.

Response:

Due to the space constraints of flush-mounting antennas, AT&T would require three (3) sections of the tower to accommodate all the antennas required. This would require making the tower 20' taller than what is currently proposed. In all likelihood, subsequent collocators on the tower would also need to occupy multiple tower sections. This would significantly reduce the antenna centerlines of the collocators and limit their ability to achieve the necessary coverage from this tower.

Backup Power

39. What is the capacity (kW) of the proposed emergency backup generator?

Response:

AT&T's emergency back-up generator is 20 kW.

40. Would the emergency backup generator be shared among all tenants on the proposed facility? Explain.

Response:

In this Application, the generator would only support AT&T's equipment/facility.

41. Would a battery backup (if applicable) be used to provide uninterrupted power and prevent a reboot condition? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?

Response:

Depending on the usage, the battery backup system would provide between 4 and 6 hours of backup power.

42. Would AT&T's backup generator run periodically for maintenance purposes? If so, at what frequency and duration? Would this be scheduled for daytime hours?

Response:

Yes, the generator will be remotely tested once per week. This test cycle can be scheduled during daytime hours. The generators are often tested midweek during daytime hours.

43. Would AT&T's backup generator be managed to comply with Regulations of Connecticut State Agencies Section 22a-174-3b?

Response:

Yes, the proposed backup generator will be compliant with Regulations of Connecticut State Agencies Section 22a-174-3b.

Public Safety

44. Would the proposed facility support text-to-911 service? Is additional equipment required for this purpose?

Response:

Yes, the proposed Facility will support text-to-911 service and no additional equipment is required.

45. Would AT&T deploy FirstNet services at the proposed site? Would this deployment require additional equipment? Explain.

Response:

FirstNet services will be supported by the equipment already proposed for the facility. No additional equipment is necessary. FirstNet operates on spectrum known as Band 14. Band 14 is part of the 700 MHz band that all the major wireless operators use in their networks. This specific portion of the 700 MHz spectrum is deployed by AT&T as part of the FirstNet Public-Private Partnership. Under normal circumstances, this spectrum is available to both public safety users and AT&T customers, but priority is given to public safety use. In the case of a major emergency, the entire Band 14 can be dedicated to public safety users. If Band 14 is dedicated to public safety users, 700 MHz Band 5/12 will still be available to non-public-safety AT&T customers.

Environment

46. Referring to Application Attachment 8 - Visibility Assessment, estimate the number of residences that would have seasonal and/or year-round views within 0.5 miles of the proposed tower.

Response:

A total of 50 residences within 0.5 miles of the proposed tower may have seasonal and/or year-round views. 37 residences are estimated to have seasonal views only and 13 residences (including the host property residence) are estimated to have a combination of year-round and seasonal views.

47. What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.

Response:

Traditional “stealth” tower design options range for example, from unipoles (with interior antennas) to monopines, any of which could technically be feasible to construct at this site. The monopine tower design option is an additional cost of \$40,000, plus annual maintenance cost of \$1,000 - \$4,000.

However, the intent of any camouflage optional tower design is to disguise the facility, or at least soften its visual effect. From a visibility mitigation standpoint, this requires the design to have context with the surrounding environment. At this site, employing something other than a traditional steel monopole design would have little to no benefit. The proposed tower will be visible above the tree line from several vantage points. A unipole design would require a substantially wider pole to accommodate internal antenna arrays and could also significantly increase the height of the structure in order to accommodate AT&T and any future carriers, effectively negating its purpose. A monopine design would increase the bulk of the tower due to the increased diameter of the pole, the addition of branches (which can extend out 10 to 16 feet or more in all directions; resulting in a total profile width of 25 to 37 feet), and potentially an increase to the top height of the facility if the top branching is added to create natural, conical shape. Further, from a context perspective, a monopine would not blend in with the surrounding foliage (which is comprised primarily of deciduous trees). In lieu of attempting to conceal the tower, one option that could soften seasonal views to nearby residences in particular, would be to paint the lower portion of the tower (below the tree line) a mottled pattern or, alternatively a solid brown or gray color, either of which would blend in with the trunks and branching of the deciduous trees at any time of year.

48. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identifies locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. site access and interior access road(s);
8. tower location/compound;
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).


The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

Response:


See attached Exhibit 48.

RESPECTFULLY SUBMITTED,

TARPON TOWERS II, LLC,

By: 
David A. Ball, Esq.
Philip C. Pires, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
Tel. No. (203) 368-0211
E-Mail: dball@cohenandwolf.com
E-Mail: ppires@cohenandwolf.com
Juris No. 010032

NEW CINGULAR WIRELESS PCS, LLC

By: 

Lucia Chiochio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
Tel. No. (914) 761-1300
E-Mail: lchiochio@cuddyfeder.com
E-Mail: kmotel@cuddyfeder.com
Juris No. 434865

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent via electronic mail on this 1st day of August, 2022, to the following:

Ira W. Bloom, Esq.
Nicholas R. Bamonte, Esq.
Berchem Moses PC
1221 Post Road East
Westport, CT 08660
ibloom@berchemmoses.com
nbamonte@berchemmoses.com

Lucia Chiocchio, Esq.
Kristen Motel, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
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lchiocchio@cuddyfeder.com
kmotel@cuddyfeder.com

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel: (860) 275-8200
kbaldwin@rc.com

Donald L. Bergmann
32 Sherwood Drive
Westport, CT 06880
donlbergmann@sbcglobal.net



David A. Ball

EXHIBIT #1

ABUTTING PROPERTY OWNERS – CERTIFIED MAIL RECEIPTS

Letters were sent to abutters via certified mail, return receipt requested, on May 18, 2022.

1. Joshua Harkey, 107 Hillspoint Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 9:58 am

2. Bivash & Mousumi Bhattacharya, 101 Greens Farms Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 2:59 pm

3. Craig & Elizabeth Fisher, 102 Greens Farms Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 10:26 am

4. Jacqueline Hayes, 111 Hillspoint Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 9:58 am

5. Rafael G. Polanco & Diana L. Cardona, 105 Greens Farms Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 2:58 pm

6. Scott & Dawn Mikuszewski, 106 Greens Farms Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 10:26 am

7. William Trefzger, 99 Greens Farms Road, Westport, CT 06880

- Certified with delivery on May 20, 2022 at 3:01 pm



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7759 79. Our records indicate that this item was delivered on 05/20/2022 at 09:58 a.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, consisting of a series of connected loops and a long horizontal stroke at the end.

A second handwritten signature in black ink, similar in style to the first, with a long horizontal stroke at the end.

Address of Recipient :

A third handwritten signature in black ink, appearing as a single, continuous, wavy line.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132076



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7759 86. Our records indicate that this item was delivered on 05/20/2022 at 02:59 p.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "Gardner".

Address of Recipient :

A handwritten address in black ink, appearing to read "15 Gardner".

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132077



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7760 06. Our records indicate that this item was delivered on 05/20/2022 at 10:26 a.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "Fiserer". The signature is written in a cursive style with a long horizontal stroke at the end.

Address of Recipient :

A handwritten address in black ink, appearing to read "102 Green". The handwriting is cursive and somewhat illegible.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

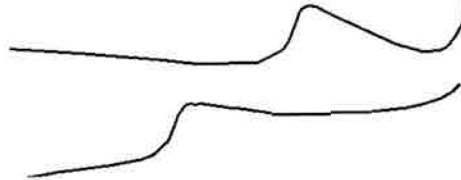
Customer Reference Number: C3435267.20132078

Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7760 44. Our records indicate that this item was delivered on 05/20/2022 at 09:58 a.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient :



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132079



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7760 82. Our records indicate that this item was delivered on 05/20/2022 at 02:58 p.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "A. J. ...".

Address of Recipient :

Handwritten address in black ink, showing "105" on the first line and a street name starting with "S..." on the second line.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132080



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7761 81. Our records indicate that this item was delivered on 05/20/2022 at 10:26 a.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "Mikuszevci". The signature is written in a cursive style with a long horizontal stroke at the end.

Address of Recipient :

A handwritten address in black ink, which is mostly illegible due to the cursive style. It appears to start with "10" followed by some numbers and possibly a street name.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132081



Date Produced: 05/23/2022

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0076 7762 04. Our records indicate that this item was delivered on 05/20/2022 at 03:01 p.m. in WESTPORT, CT 06880. The scanned image of the recipient information is provided below.

Signature of Recipient :

Handwritten signature and name: A stylized signature followed by the text "TR 07 (hex)" written in a cursive-like font.

Address of Recipient :

Handwritten address: Two lines of illegible cursive handwriting.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C3435267.20132082

EXHIBIT #28

Symbol Key

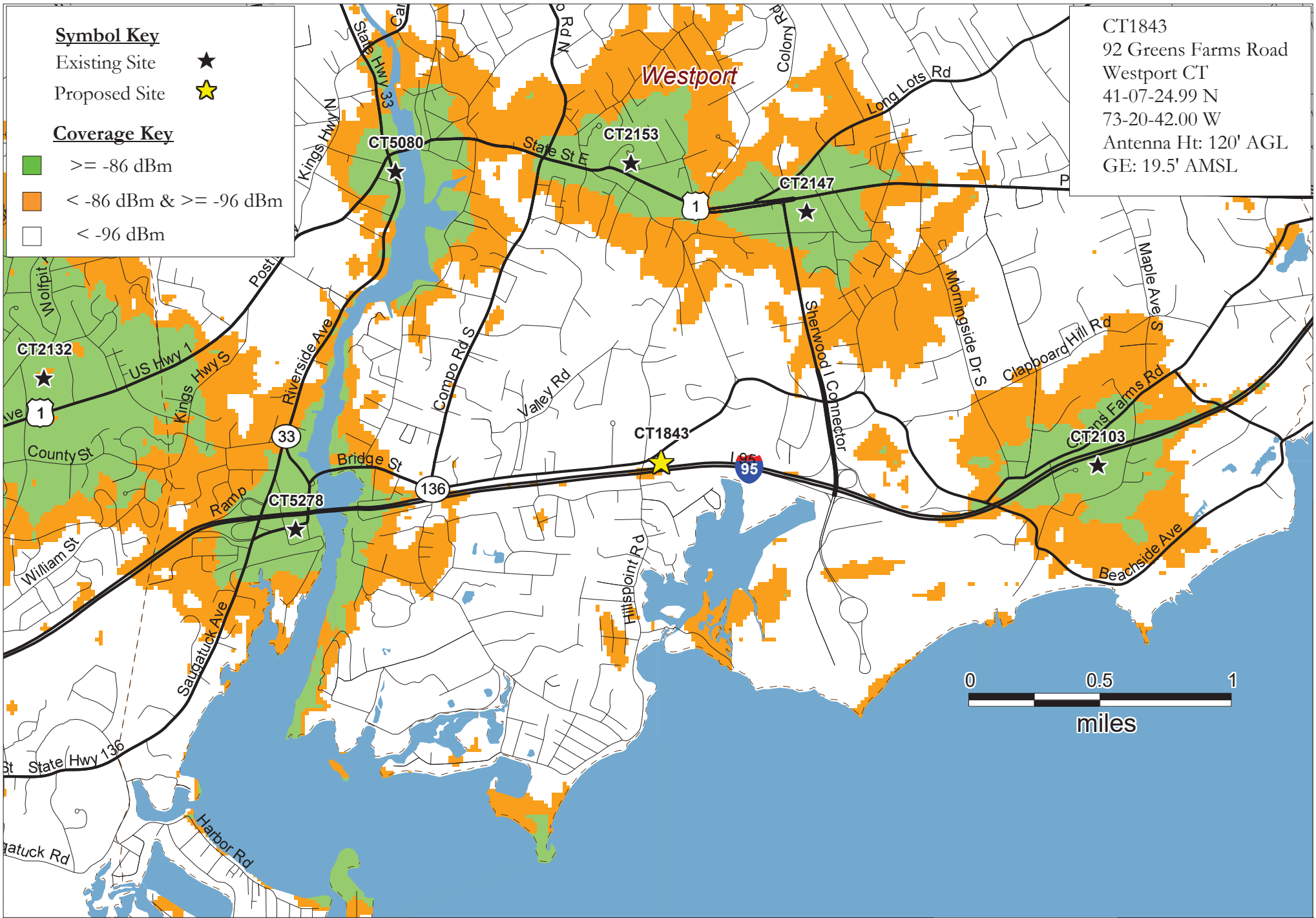
Existing Site ★

Proposed Site ★

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing Coverage
1900 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

Symbol Key

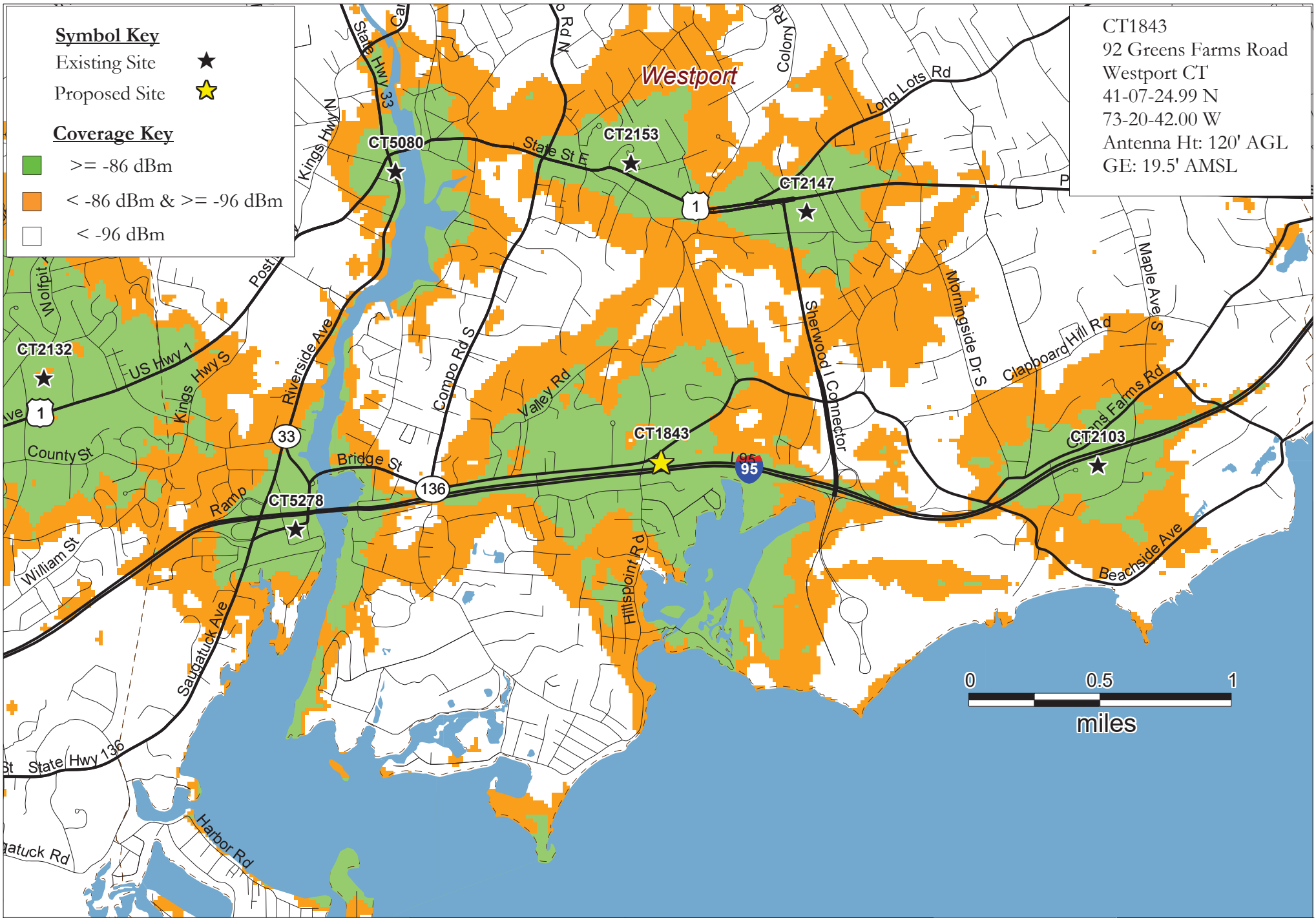
Existing Site ★

Proposed Site ★

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing & Proposed Coverage
1900 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

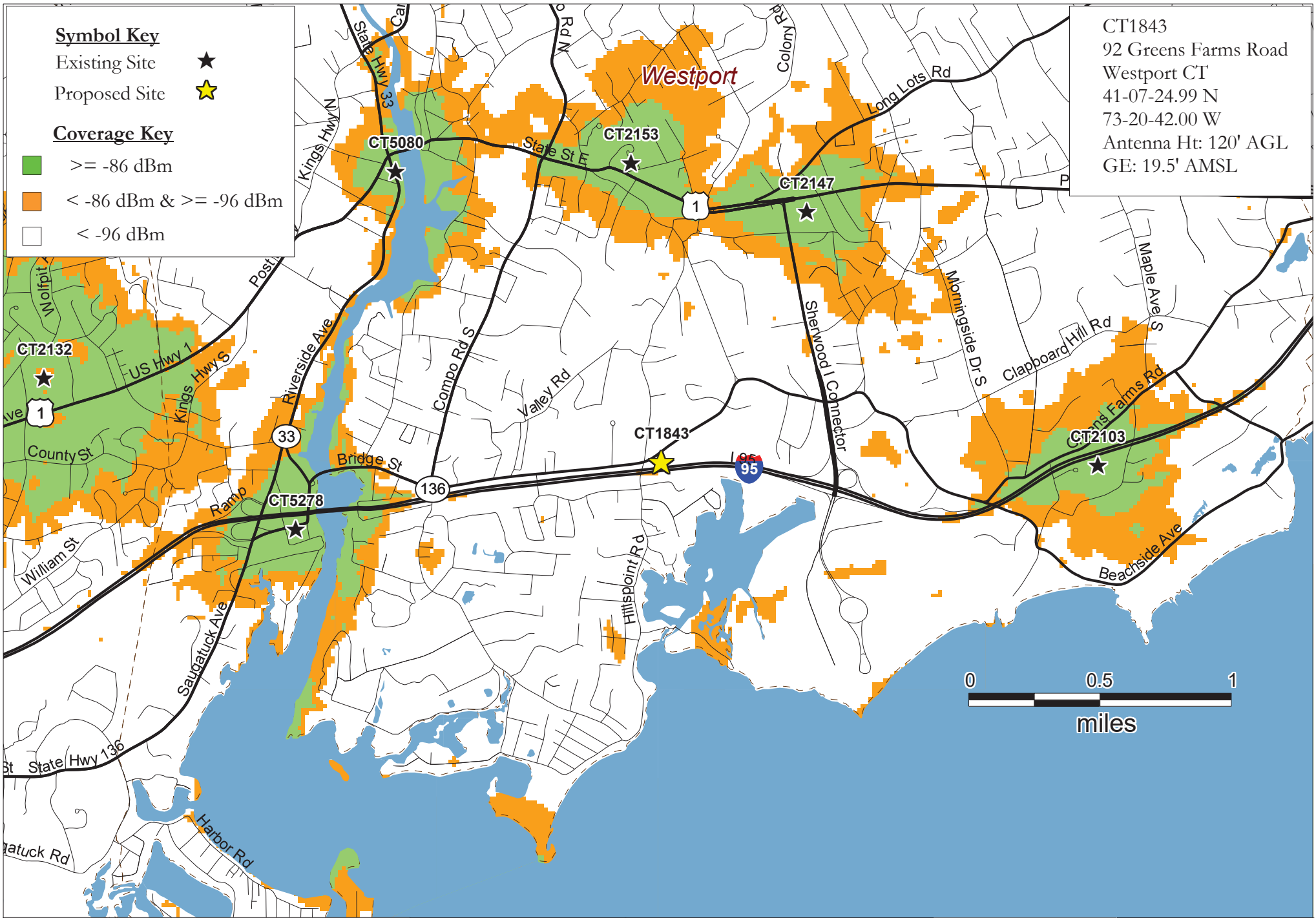
Symbol Key

- Existing Site ★
- Proposed Site ★

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing Coverage
2100 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

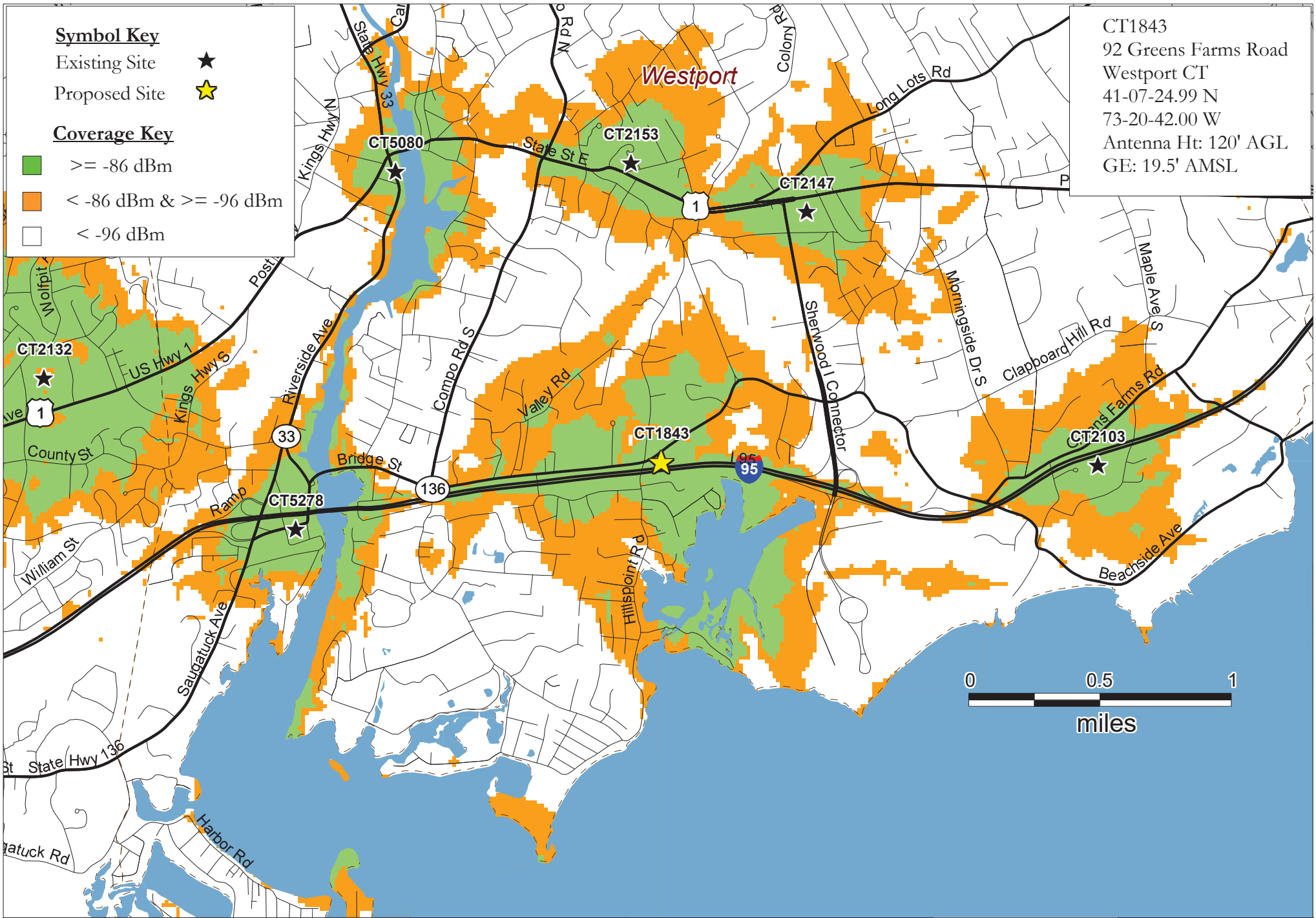
Symbol Key

- Existing Site ★
- Proposed Site ☆

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing & Proposed Coverage
2100 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

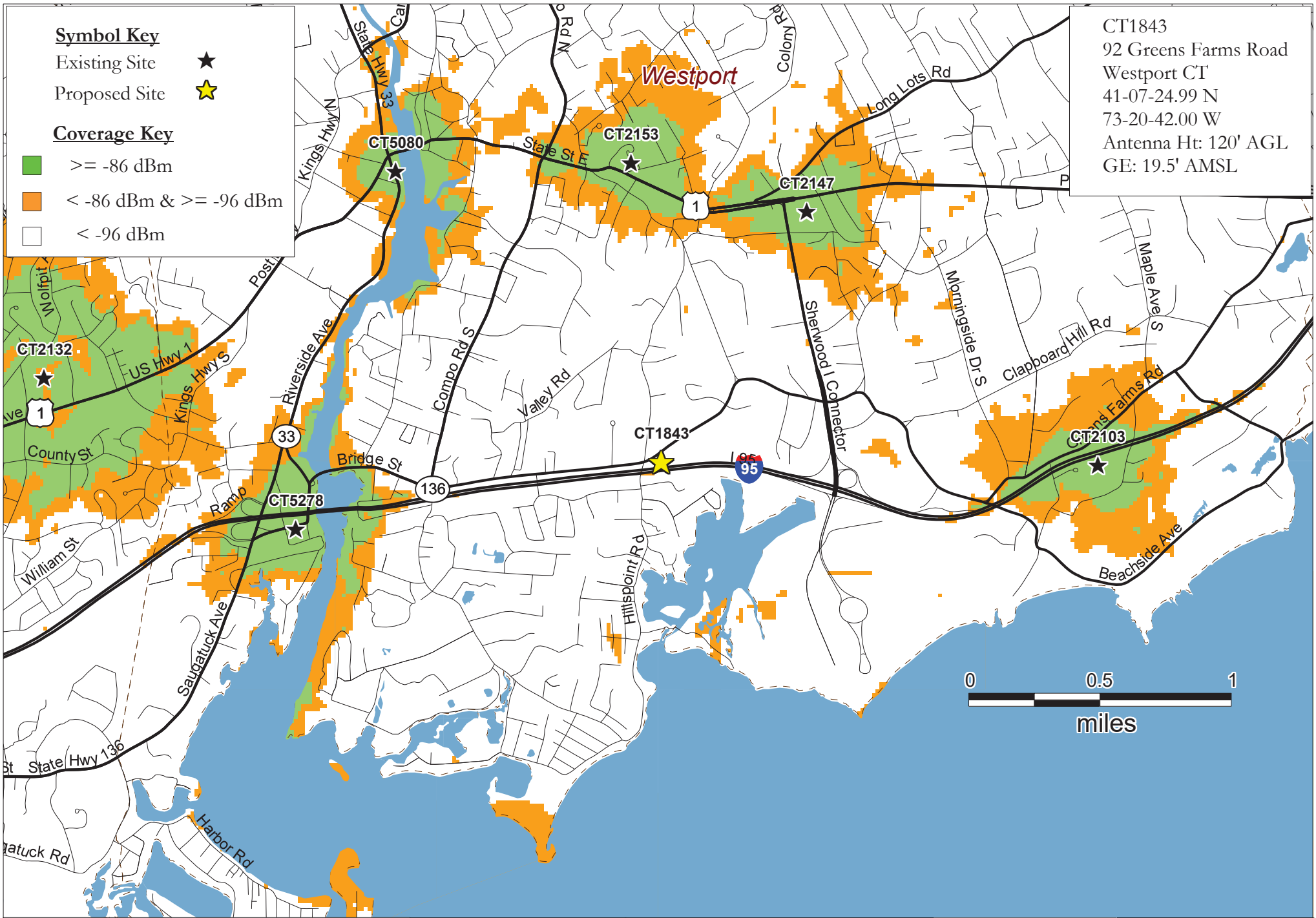
Symbol Key

- Existing Site ★
- Proposed Site ★

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing Coverage
2300 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

Symbol Key

Existing Site ★

Proposed Site ★

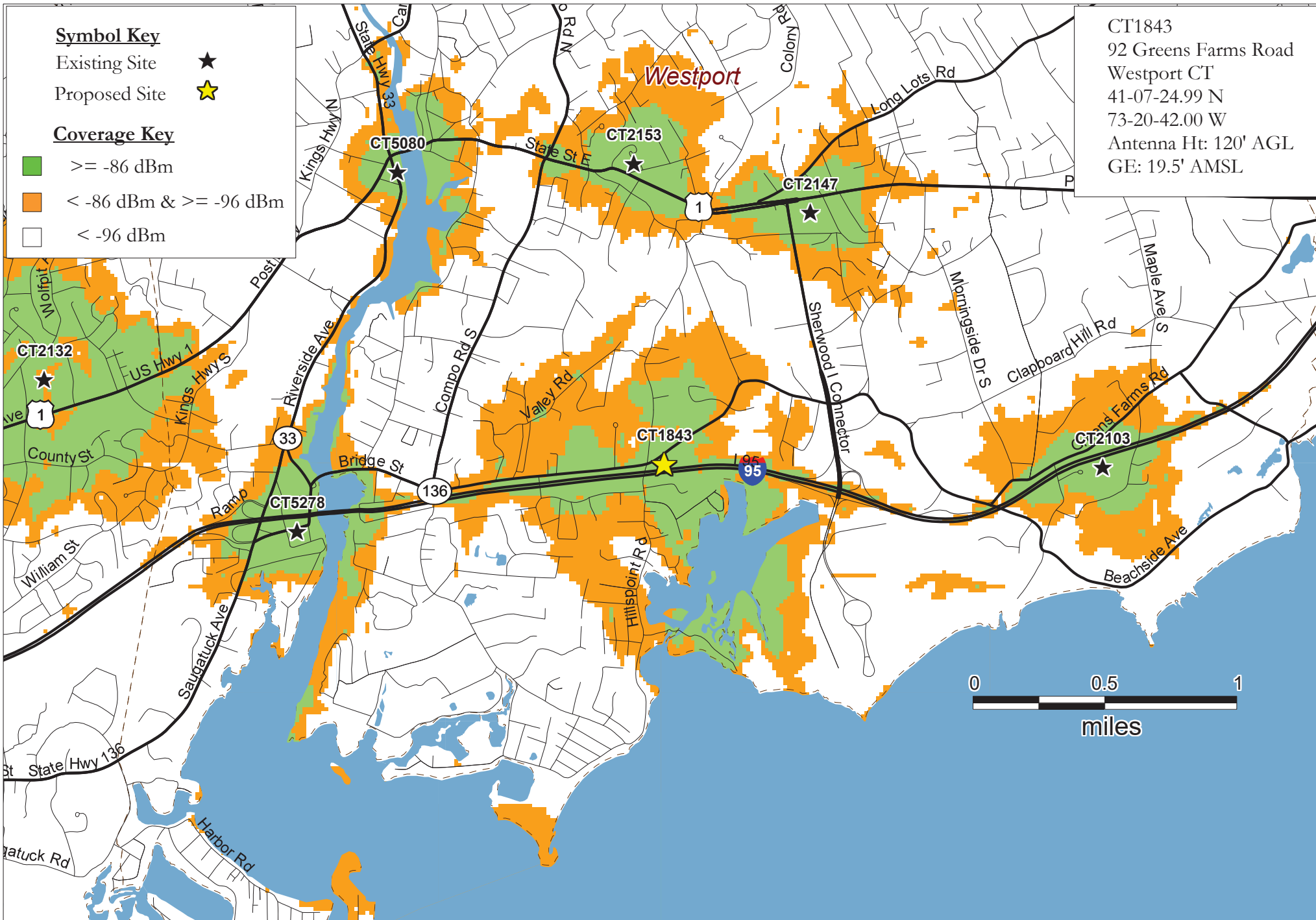
Coverage Key

■ ≥ -86 dBm

■ < -86 dBm & ≥ -96 dBm

□ < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing & Proposed Coverage
2300 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

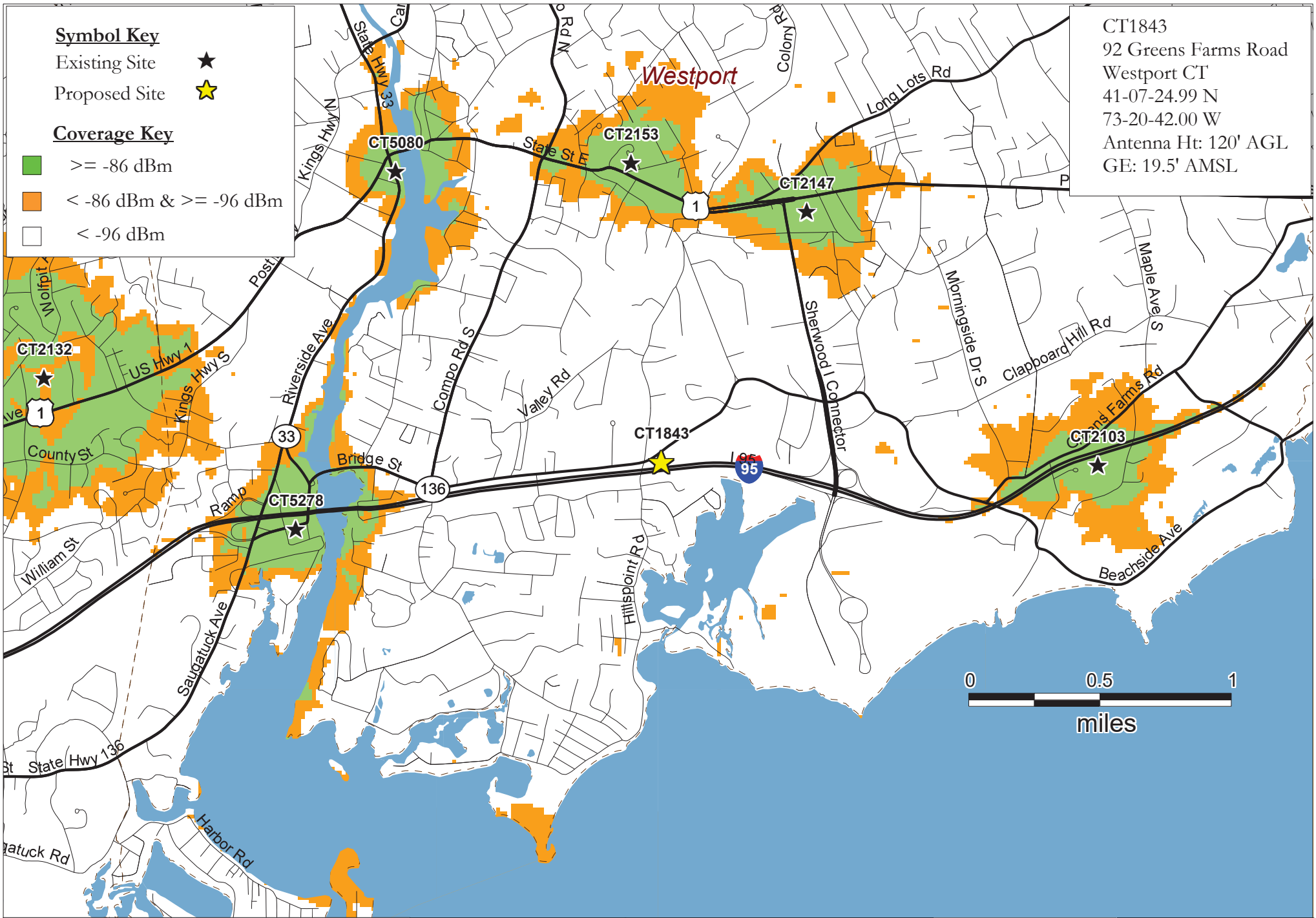
Symbol Key

- Existing Site ★
- Proposed Site ☆

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing Coverage
3700 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

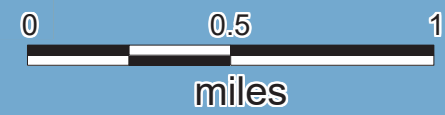
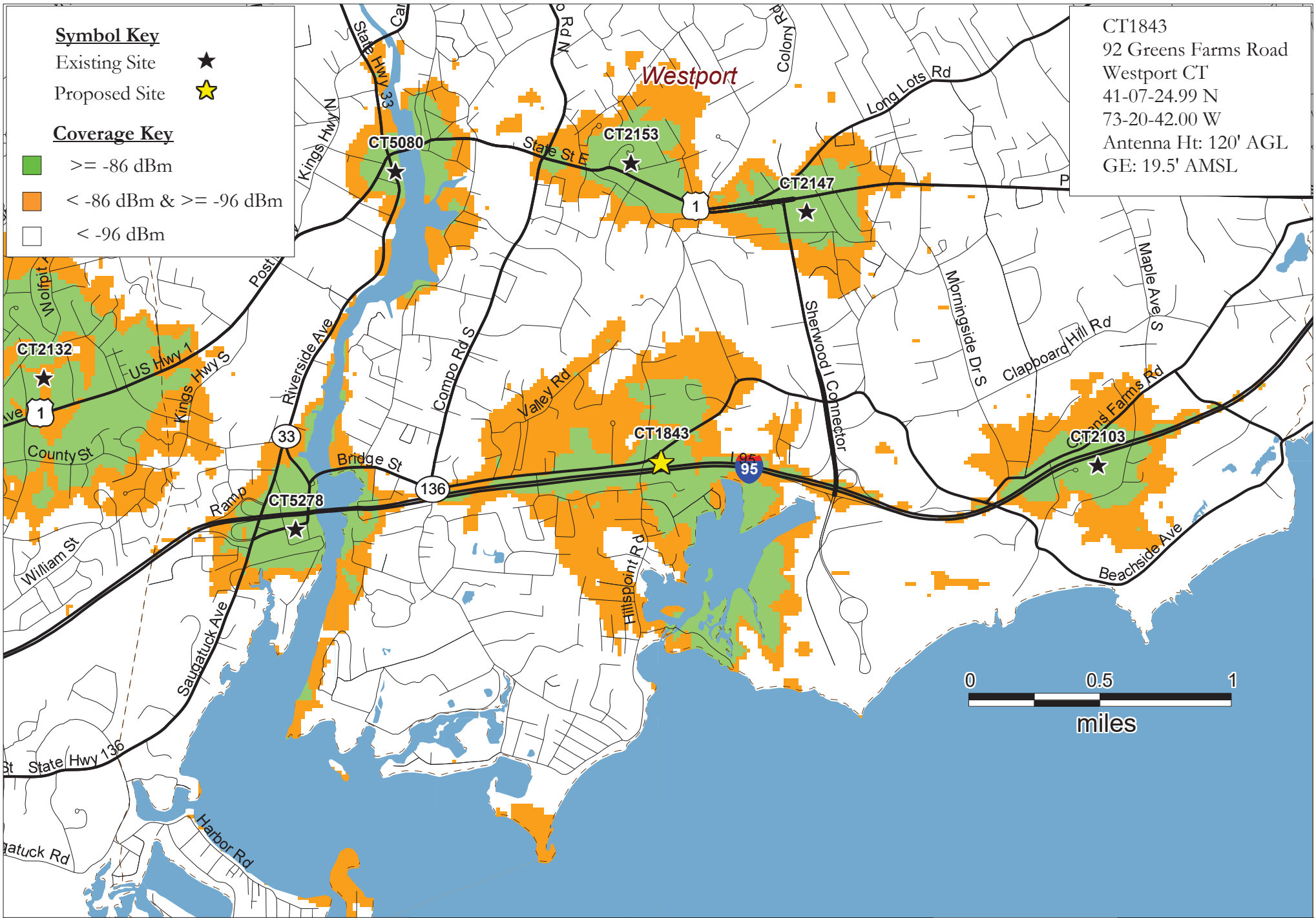
Symbol Key

- Existing Site ★
- Proposed Site ★

Coverage Key

- ≥ -86 dBm
- < -86 dBm & ≥ -96 dBm
- < -96 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing & Proposed Coverage
3700 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/26/2022

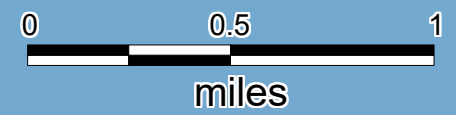
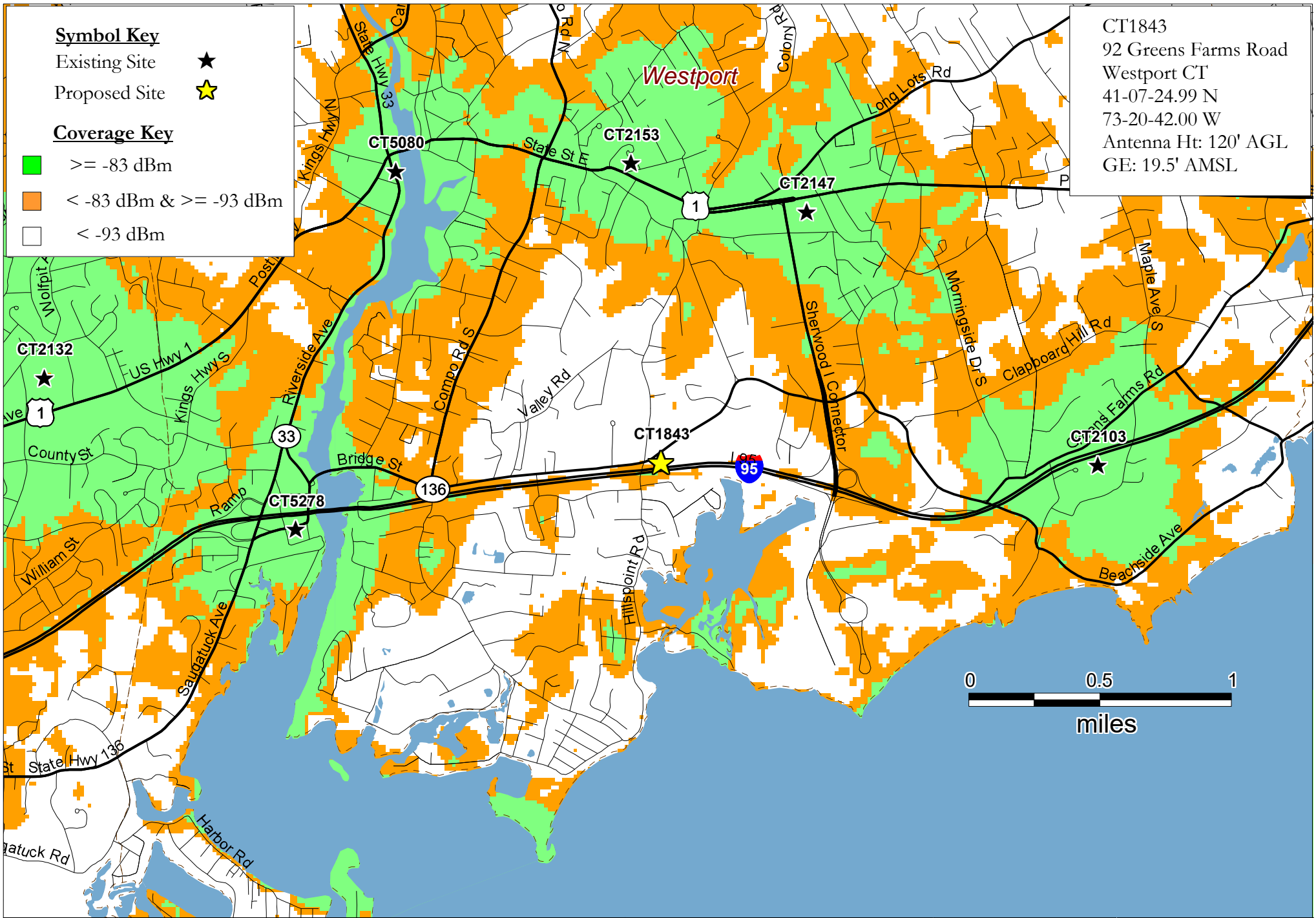
Symbol Key

- Existing Site ★
- Proposed Site ☆

Coverage Key

- ≥ -83 dBm
- < -83 dBm & ≥ -93 dBm
- < -93 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing Coverage
850 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/13/2022

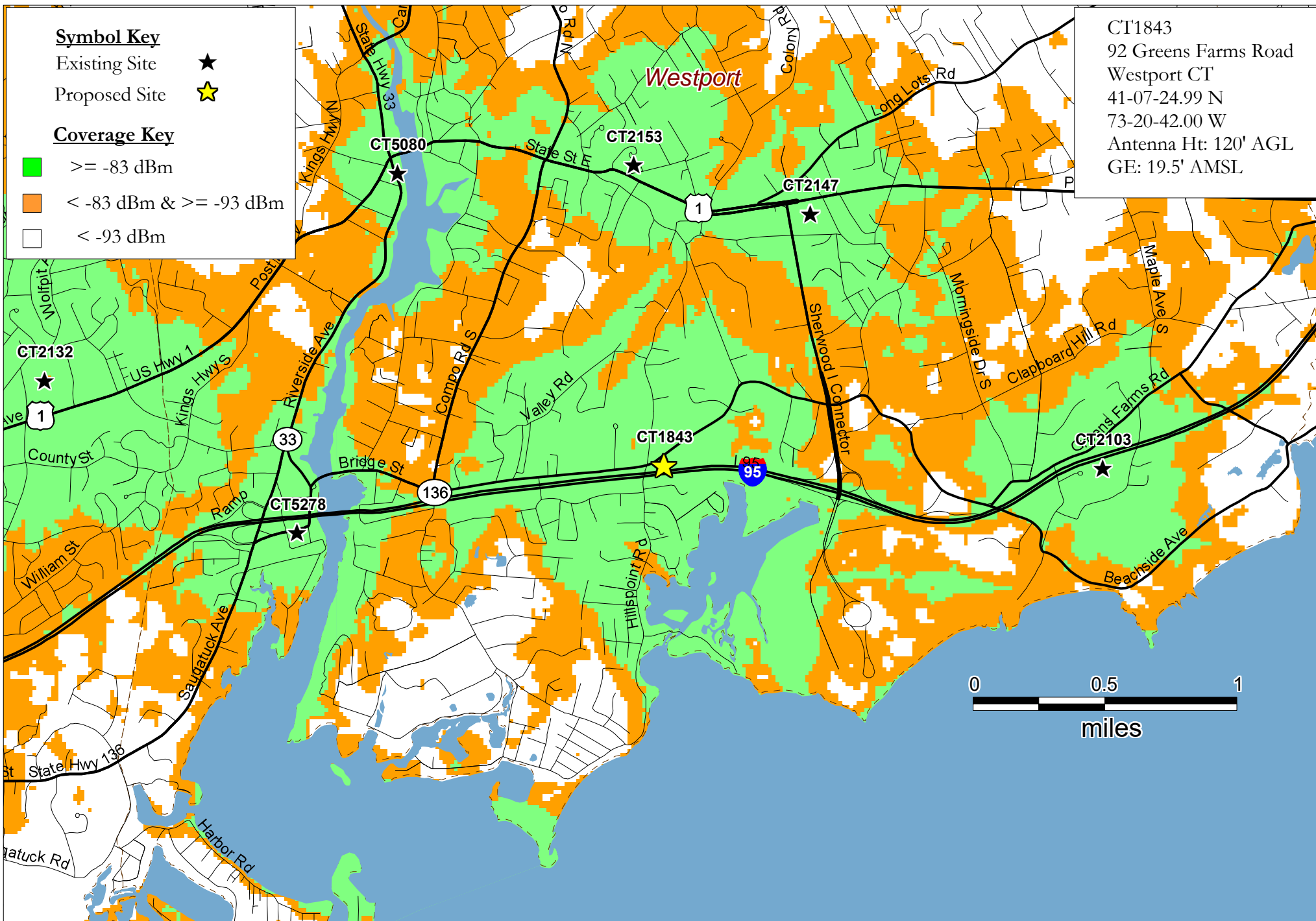
Symbol Key

- Existing Site ★
- Proposed Site ☆

Coverage Key

- ≥ -83 dBm
- < -83 dBm & ≥ -93 dBm
- < -93 dBm

CT1843
92 Greens Farms Road
Westport CT
41-07-24.99 N
73-20-42.00 W
Antenna Ht: 120' AGL
GE: 19.5' AMSL



Existing & Proposed Coverage
850 MHz LTE

CT1843

92 Greens Farms Road
Westport CT



07/13/2022

EXHIBIT #48

REMOTE FIELD REVIEW



**CT SITING COUNCIL DOCKET NO. 510
RESPONSE TO COUNCIL INTERROGATORY #48
WESTPORT
92 GREENS FARMS ROAD
WESTPORT, CT 06880**

PREPARED FOR:



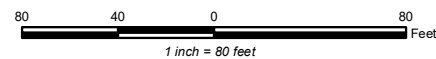
PREPARED BY:

**ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385**



PHOTO LOG

- Photo Locations
- Host Property
- Delineated Wetland Boundary
- Approximate Wetland Area
- Proposed Site Access
- Proposed Fenced Compound
- Proposed Equipment
- Proposed Conduit
- Approximate Parcel Boundary



Proposed Wireless Telecommunications Facility
 CT 1024 - Westport
 92 Greens Farms Road
 Westport, Connecticut



PROPOSED ACCESS DRIVE ENTRANCE

PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

1

GREENS FARMS ROAD LOOKING SOUTHWEST



PROPOSED ACCESS DRIVE ENTRANCE

PHOTO

2

DESCRIPTION

GREENS FARMS ROAD LOOKING NORTHEAST



PHOTOGRAPHED ON 7/18/2022



NORTH



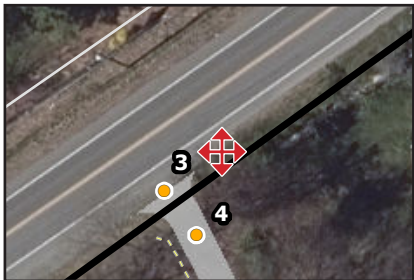
EAST



SOUTH



WEST



PHOTO

3

DESCRIPTION

VIEW FROM PROPOSED ACCESS DRIVE ENTRANCE - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 7/18/2022



PHOTO

DESCRIPTION

4A

PROPOSED ACCESS DRIVE LOOKING SOUTHEAST



PHOTO

DESCRIPTION

4B

PROPOSED ACCESS DRIVE LOOKING NORTHWEST



PHOTO

DESCRIPTION

5A

PROPOSED ACCESS DRIVE LOOKING SOUTHEAST



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

5B

PROPOSED ACCESS DRIVE LOOKING NORTHWEST



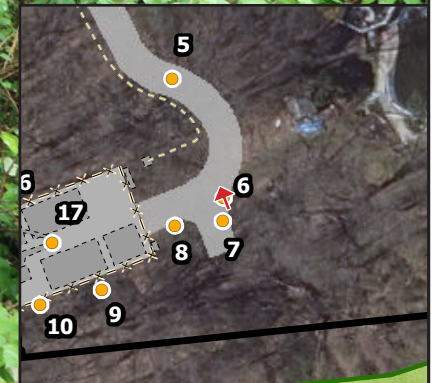
PROPOSED/ACCESS DRIVE

PHOTO

6

DESCRIPTION

PROPOSED ACCESS DRIVE LOOKING NORTHWEST



PHOTOGRAPHED ON 7/18/2022



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

7A

PROPOSED ACCESS DRIVE LOOKING WEST



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

7B

PROPOSED ACCESS DRIVE LOOKING NORTHEAST TOWARDS HOST PROPERTY RESIDENCE



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

8

PROPOSED ACCESS DRIVE LOOKING SOUTH



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

9

PROPOSED SOUTHERN FENCELINE LOOKING SOUTH



PHOTO

10

DESCRIPTION

PROPOSED SOUTHERN FENCELINE LOOKING SOUTH



PHOTO

11

DESCRIPTION

PROPOSED SOUTHWEST FENCE CORNER LOOKING SOUTH



PHOTO

DESCRIPTION

12

PROPOSED WESTERN FENCELINE LOOKING SOUTHEAST



PHOTO

DESCRIPTION

13

PROPOSED WESTERN FENCELINE LOOKING WEST



PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

14

WEST OF PROPOSED COMPOUND LOOKING EAST



PROPOSED NORTHWEST FENCE CORNER

PHOTOGRAPHED ON 7/18/2022

PHOTO

DESCRIPTION

15

PROPOSED WESTERN FENCELINE LOOKING NORTH



PHOTO

DESCRIPTION

16A

PROPOSED NORTHERN FENCELINE LOOKING NORTHEAST



PHOTO

DESCRIPTION

16B

PROPOSED NORTHERN FENCELINE LOOKING SOUTHWEST



PHOTO
16C

DESCRIPTION

PROPOSED NORTHERN FENCELINE LOOKING NORTH



NORTH



PROPOSED NORTHEAST FENCE CORNER

EAST



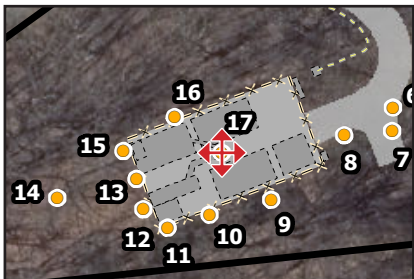
PROPOSED SOUTHWEST FENCE CORNER

SOUTH



PROPOSED NORTHWEST FENCE CORNER

WEST



PHOTO

17

DESCRIPTION

VIEW FROM PROPOSED TOWER - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 7/18/2022