

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC
AND NEW CINGULAR WIRELESS PCS, LLC d/b/a
AT&T FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE, AND OPERATION OF A
TELECOMMUNICATIONS FACILITY AT
183 SOUNDVIEW LANE, TOWN OF NEW
CANAAN, CONNECTICUT

DOCKET NO. 487

July 2, 2020

HOMELAND TOWERS, LLC and NEW CINGULAR WIRELESS PCS, LL (AT&T)
RESPONSES TO SITING COUNCIL PRE-HEARING INTERROGATORIES
SET TWO

Q34. Referencing Tab 12 of the Application, submit a copy of the signed and dated Certification of Service on federal, state and municipal agencies.

A34. *Please see the Certification of Service included in Attachment 1.*

Site/tower

Q35. Provide the widths of the proposed monopole (i.e. faux “tree trunk”) at the base and at the top.

A34. *Typically, a monopine at the proposed height is approximately 5’-6’ in diameter at the base and tapers to approximately 18”-30” in diameter at the top.*

Q36. Referencing the Applicants’ response to Council interrogatory 5, how would New Cingular Wireless PCS, LLC (AT&T) recover the cost of its equipment for this project?

A36. *AT&T recovers costs as part of business operations for its customers.*

Q37. Referencing Tab 8 of the Application, Visual Assessment, page 6, it states, “The nearest school building is located +/-250 feet from the Host Property.” Referencing Sheet SP-1 of the Supplemental Submission dated May 27, 2020, should it be “...+/- 250 feet from the proposed facility?”

A37. *As shown on drawing SP-1, the school building is located 250± from the proposed monopine.*

Q38. Referencing the Applicants’ response to Council interrogatory 21, which wireless carrier expressed an interest in co-locating at the proposed facility? What is the status of any discussions with the wireless carrier regarding co-location? Would such wireless carrier co-locate at a centerline height of 71 feet, directly below AT&T? As an update, has the Town of New Canaan expressed an interest in co-locating emergency service antennas on the proposed facility?

- A38. *Verizon's Senior Radio Frequency Engineer confirmed in a June 24, 2020 email to Homeland Towers that they are indeed interested in co-locating at the proposed facility at a centerline height of 71', directly below AT&T. The Town of New Canaan and their public safety consultant, NorcomCT, have since expressed an interest in having the top of the tower reserved for future use in co-locating emergency antennas.*
- Q39. Referencing the Applicants' Supplemental Submission dated May 27, 2020, Sheet C-1, what is the height of the walk-in equipment cabinet?
- A39. *The height of AT&T's walk-in cabinet ("WIC") is approximately 9.5'.*

Alternatives

- Q40. Referencing the Applicants' response to Council interrogatory 20, the search ring is a circle with a 3/4-mile radius and centered at the proposed site. Referencing Tab 2 of the Application, Properties Investigated by Homeland Towers, the Applicants note that Homeland Towers, LLC (Homeland) investigated 23 sites "in and around the New Canaan search area." Provide an updated and expanded view of Application Tab 2, Figure 1 (Aerial Map of Homeland Towers Search and Proposed Site) with a 3/4-mile radius search ring circle depicted and centered on the proposed site.
- A40. *Please see the updated Aerial Map of Homeland Towers Search and Proposed Site with a 3/4 mile radius search ring circle depicted and centered on the proposed site included in Attachment 2.*
- Q41. Referencing the Applicants' response to Wiley interrogatory 29, explain why AT&T's radio frequency engineers determined that a tower facility at 1160 Smith Ridge Road would not provide service to the area intended to be covered by the proposed facility.
- A41. *The tower facility at 1160 Smith Ridge Road would not provide coverage to the area intended for coverage by the Proposed Facility because this site is too far west. The propagation map included in Attachment 3 shows the coverage from a 146' tall tower facility at 1160 Smith Ridge Road and demonstrates that it would not provide adequate service to the intended service area.*

Cost

- Q42. Did any of the cost numbers on page 27 of the Application materially change as a result of the Applicants' Supplemental Submission dated May 27, 2020? Explain.
- A42. *No, AT&T's equipment cost estimates did not materially change as the updated generator is comparable in price to the originally proposed generator.*

Coverage/Capacity

- Q43. Referencing Tab 1 of the Application, Radio Frequency Analysis Report (RF Report), please provide tables for 850 MHz, 1900 MHz and 2100 MHz based on the existing coverage gap data similar in format to Table 1 on page 3 of the RF Report.
- A43. *Please see the tables included in Attachment 4.*

Q44. Referencing the response to Council interrogatory 14, please provide the distances and directions from the proposed facility to each hand-off site.

A44. *Please see the table below.*

Site Name	Address	City/State	Latitude	Longitude	Antenna Height (ft AGL)	Ground Elevation	Distance (miles)	Direction
CT2143	46 Fenwood Lane	Wilton	41.1726	-73.4339	163	367	3.4	ESE
CT2282	95 Country Club Road	New Canaan	41.1729	-73.4963	89	495	1.2	SE
CT2841	208 Valley Road	New Canaan	41.1662	-73.4705	86	266	2.1	SE
CT5057	187 Danbury Road	Wilton	41.1841	-73.4215	72	157	3.9	E
CT5058	289 Danbury Road	Wilton	41.1950	-73.4314	96	177	3.3	E
CT5060	27 Cannon Road	Wilton	41.2137	-73.4275	102	217	3.9	ENE
NY2145	377 Smith Ridge Road	South Salem	41.2144	-73.5151	140	587	1.9	NNE

Q45. Referencing the Applicants’ response to Council interrogatory 15, the Applicants’ state that, “The site is primarily intended to provide additional coverage to the objective area, but as with all new sites, it will also enhance capacity.” Identify any adjacent site sectors that the proposed facility would provide capacity relief for, if applicable. Also, if applicable, would the proposed facility extend the projected capacity exhaustion dates for any adjacent site sectors?

A45. *The Proposed Facility will not provide capacity relief for any adjacent site sectors.*

Backup power

Q46. Referencing Tab 4 of the Application, Sheet C-1, the originally proposed backup generator had an approximate run time of 48 hours. Provide the updated run time based on the generator configuration identified in the Applicants’ Supplemental Submission dated May 27, 2020.

A46. *The generator detailed in the Supplemental Submission has an approximate run time of 53 hours.*

Q47. Referencing the Applicants’ response to Council interrogatory 22, is the generator fluid containment and alarm measures information still applicable to the revised/updated generator configuration? If no, please update.

A47. *Yes, the response to Siting Council Interrogatory 22 is still applicable to the revised/updated generator configuration.*

Environment

Q48. Referencing Tab 8 of the Application, Photo-Simulations, there are some photo locations that are identified as “crane visible through trees” that are farther away from the

proposed tower site than some photo locations that are identified as “not visible.” For example, Location Nos. 6 and 7 are visible through the trees while Location Nos. 3, 5 and 8 are not visible. Is this due to topography? Explain.

A48. *This is due in large part to the topography in the area. An additional factor that creates non-visible locations is due to the uniqueness of the trunks and branches of intervening trees.*

Q49. Describe the visibility of the proposed facility from the following locations:

A49.

a) St. Luke’s School; *While performing the field review, APT and Homeland requested access to St. Luke’s School campus to evaluate potential visibility of the Proposed Facility. Access was denied and, as such no photo-documentation was completed on the St. Luke’s School campus proper. Based on the viewshed map, the proposed facility will be visible from the campus. Photo locations 17, 18 and 19 presented in the Visual Assessment included in Attachment 8 of the Application represent year-round and seasonal views along North Wilton Road and Brisco Road immediately northwest of the campus.*

b) The Sosnick property at 144 Soundview Lane; *Photo location 22 in the Visual Assessment depicts existing views on Soundview Lane near the northern property line of 144 Soundview Lane. The crane was not visible, which is consistent with the Viewshed Analysis maps presented in the Application. Being private property, no photographs were taken on the Sosnick parcel.*

c) The Sweeney property at 155 Soundview Lane; *Photo location 22 in the Visual Assessment also represents an area in front of the Sweeney property, across from 144 Soundview Lane. Based on the Viewshed Analysis maps, some seasonal views may occur on portions of this property. Photographs were not taken on the Sweeney property;*
and

d) The Wiley property at 173 Soundview Lane. *Portions of 173 Soundview Lane are anticipated to have a mix of seasonal to year-round visibility of the proposed facility. This property is separated from 183 Soundview Lane by mature trees. No photographs were taken on the Wiley property.*

Q50. Referencing the Supplemental Submission dated May 27, 2020, Sheet CP-1, sound attenuation blankets are proposed along the southeast and southwest sides of the compound. Explain why the sound attenuation blankets are not proposed along the northeast and northwest sides also.

A50. *The proposed sound attenuation blankets are proposed along the southeast and southwest sides in consideration of the existing house at the Site. As set forth in the Sound Study included in the Supplemental Submission, the proposed Facility will comply with all applicable noise level requirements.*

Q51. Would any fuels be stored on site during construction? If so, provide fuel storage/spill prevention control details.

A51. *No fuels would be stored on site during construction. Construction vehicles are fueled up prior to mobilization and any subsequent fueling would occur off site.*

Q52. Referencing the Applicants' response to Council interrogatory 12, would the calculated agricultural soil impact areas be materially affected by the revisions in the Supplemental Submission dated May 27, 2020? Explain.

A52. *No additional agricultural soils will be materially affected by the revisions in the Supplemental Submission. The AT&T generator is being installed within the fenced compound. This location was incorporated in the calculations addressed in the response to Siting Council Interrogatory 12.*

Q53. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify 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. utility pads/electrical interconnection(s);
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.

A53. *Please see the Remote Field Review photo documentation report in Attachment 5.*

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing was sent electronically and one hard copy via first class mail to the Connecticut Siting Council and sent electronically to the service list below, in accordance with Connecticut Siting Council directives.

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July 2, 2020



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Attorneys for the Applicants

ATTACHMENT 1

CERTIFICATION OF SERVICE

I hereby certify that on the 6th day of Feb 2020, a copy of the foregoing Application to the State of Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need, was sent by first class certified mail to the list below.

Dated: 2/6/20

R. Crocchio
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Attorneys for:
Homeland Towers, LLC and
New Cingular Wireless PCS, LLC

State

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DEPARTMENT OF EMERGENCY SERVICES & PUBLIC PROTECTION DIVISION OF EMERGENCY MANAGEMENT AND HOMELAND SECURITY JAMES C. ROVELLA, COMMISSIONER 1111 COUNTRY CLUB ROAD MIDDLETOWN, CT 06457	STATE SENATOR – 26 TH DISTRICT WILLIAM HASKELL LEGISLATIVE OFFICE BUILDING 300 CAPITAL AVENUE ROOM 3300 HARTFORD, CT 06106

SECRETARY OF THE STATE DENISE W. MERRILL STATE OF CONNECTICUT 30 TRINITY STREET HARTFORD, CT 06106	STATE REPRESENTATIVE- 125 TH DISTRICT TOM O'DEA LEGISLATIVE OFFICE BUILDING 300 CAPITAL AVENUE ROOM 4200 HARTFORD, CT 06106
STATE SENATOR - 36 TH DISTRICT ALEX BERGSTEIN LEGISLATIVE OFFICE BUILDING 300 CAPITAL AVENUE ROOM 2400 HARTFORD, CT 06106	STATE REPRESENTATIVE- 142 TH DISTRICT LUCY DATHAN LEGISLATIVE OFFICE BUILDING 300 CAPITAL AVENUE ROOM 4000 HARTFORD, CT 06106

Federal

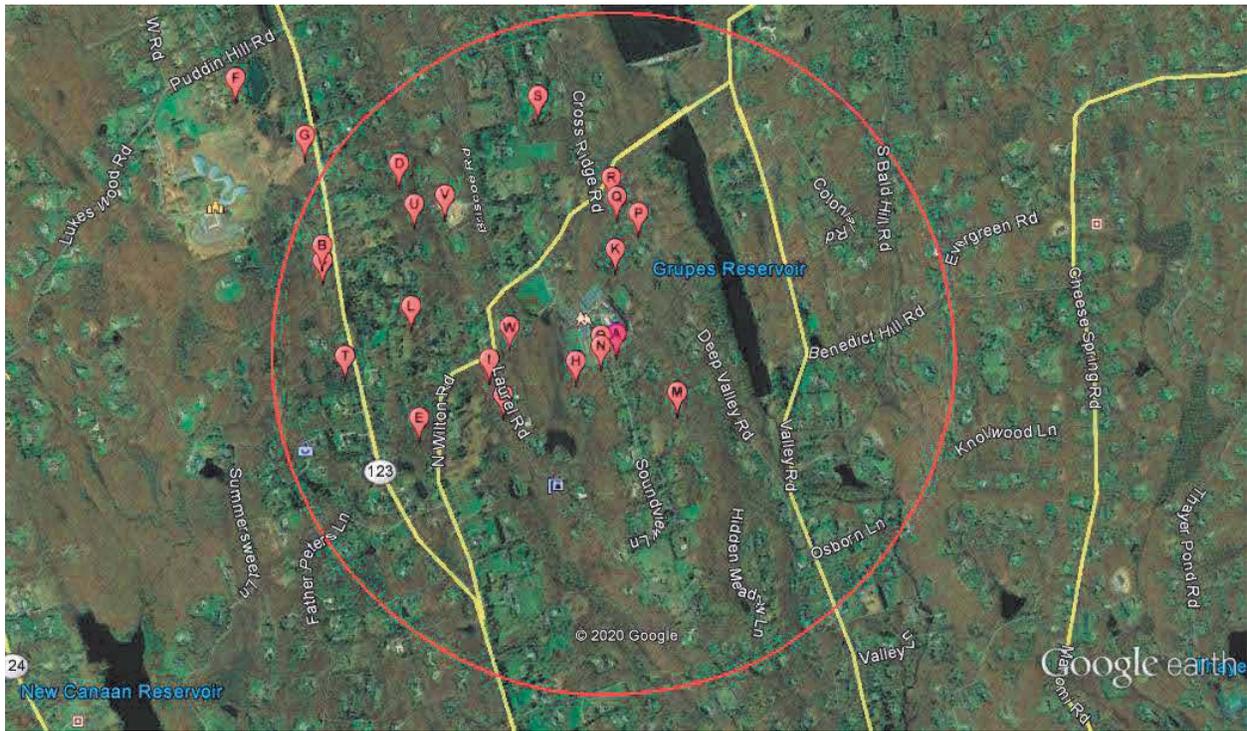
FEDERAL COMMUNICATIONS COMMISSION 445 12 TH STREET SW WASHINGTON, DC 20554	FEDERAL AVIATION ADMINISTRATION 800 INDEPENDENCE AVENUE, SW WASHINGTON, DC 20591
U.S. SENATOR CHRISTOPHER MURPHY COLT GATEWAY 120 HUYSHOPE AVENUE SUITE 401 HARTFORD, CT 06106	U.S. SENATOR RICHARD BLUMENTHAL 90 STATE HOUSE SQUARE, 10 TH FLOOR HARTFORD, CT 06103
U.S. CONGRESSMAN - FOURTH DISTRICT JIM HIMES 211 STATE STREET, 2 ND FLOOR BRIDGEPORT, CT 06604	

Town of New Canaan

KEVIN MOYNIHAN, FIRST SELECTMAN TOWN HALL, 2 ND FLOOR 77 MAIN STREET NEW CANAAN, CT 06840	PLANNING & ZONING COMMISSION TOWN HALL, LOWER LEVEL 77 MAIN STREET NEW CANAAN, CT 06840
INLAND WETLANDS COMMISSION TOWN HALL, LOWER LEVEL 77 MAIN STREET NEW CANAAN, CT 06840	BUILDING COMMISSION TOWN HALL, LOWER LEVEL 77 MAIN STREET NEW CANAAN, CT 06840
LYNN BROOKS AVNI, TOWN PLANNER TOWN HALL, LOWER LEVEL 77 MAIN STREET NEW CANAAN, CT 06840	CONSERVATION COMMISSION TOWN HALL 77 MAIN STREET NEW CANAAN, CT 06840

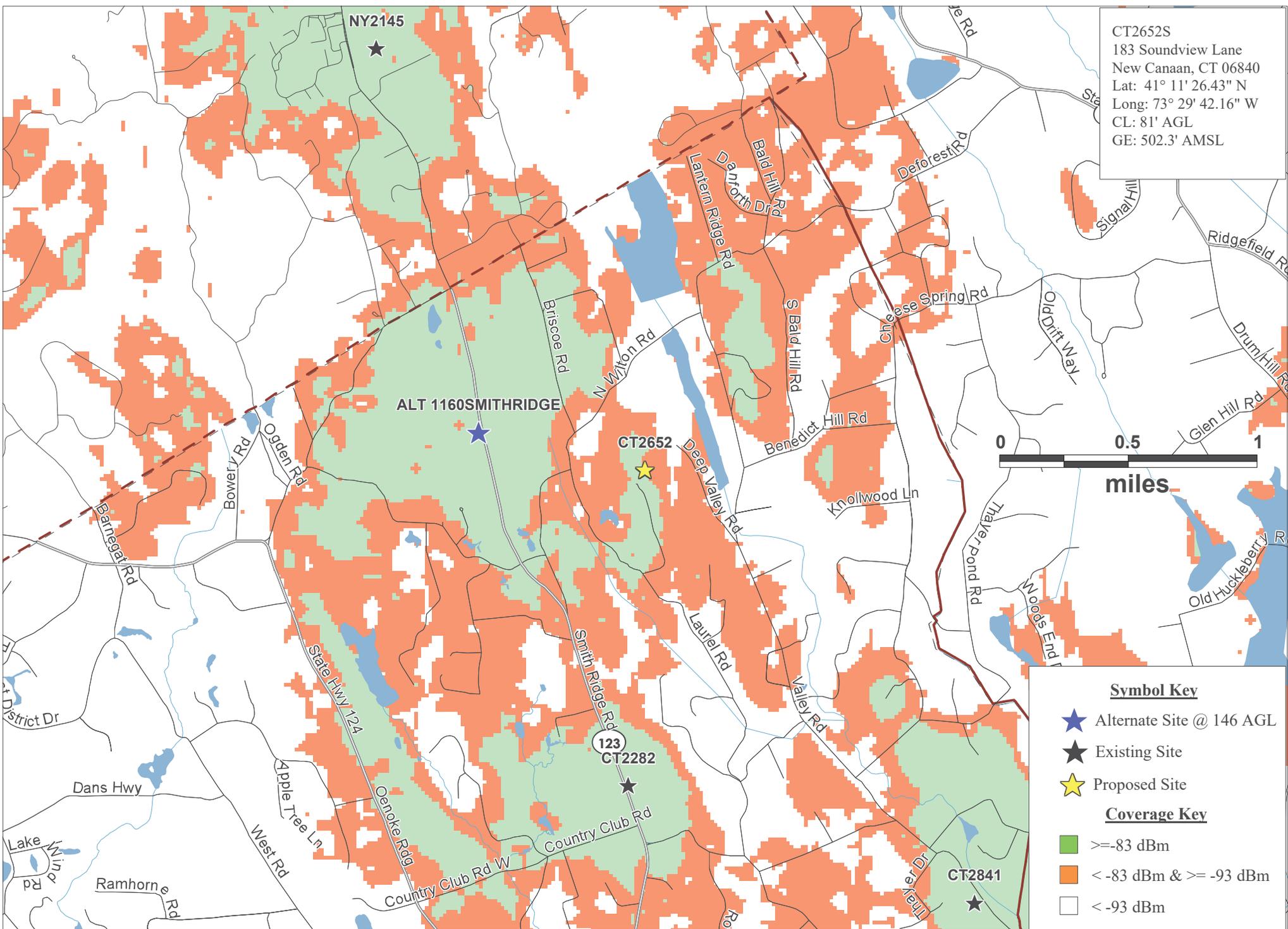
ATTACHMENT 2

Aerial Map of Homeland Towers search and proposed site with a 3/4 mile radius search ring



ATTACHMENT 3

CT2652S
 183 Soundview Lane
 New Canaan, CT 06840
 Lat: 41° 11' 26.43" N
 Long: 73° 29' 42.16" W
 CL: 81' AGL
 GE: 502.3' AMSL



Symbol Key

- ★ Alternate Site @ 146 AGL
- ★ Existing Site
- ★ Proposed Site

Coverage Key

- >=-83 dBm
- <-83 dBm & >=-93 dBm
- <-93 dBm

Existing & Alternate
 700 MHz LTE Coverage

CT2652S

183 Soundview Lane
 New Canaan, CT 06840



PREPARED ON _____
 DATE: 04/22/2020

REV 0

ATTACHMENT 4

	Existing 850 MHz LTE Coverage Gap	
Population:¹	(≥ -83 dBm)	6,153
	(≥ -93 dBm)	4,225
<hr/>		
Business Pops:²	(≥ -83 dBm)	1,148
	(≥ -93 dBm)	663
<hr/>		
Area (mi²):	(≥ -83 dBm)	14.74
	(≥ -93 dBm)	9.55
<hr/>		
Roadway (mi):	Main (-93 dBm):	3.8
	Secondary (-93 dBm):	36.0
	Total (-93 dBm):	39.8

	Incremental Coverage from Proposed Site (850 MHz)	
Population:¹	(≥ -83 dBm)	288
	(≥ -93 dBm)	887
<hr/>		
Business Pops:²	(≥ -83 dBm)	66
	(≥ -93 dBm)	131
<hr/>		
Area (mi²):	(≥ -83 dBm)	0.68
	(≥ -93 dBm)	1.95
<hr/>		
Roadway (mi):	Main (-93 dBm):	0.5
	Secondary (-93 dBm):	8.8
	Total (-93 dBm):	9.3

¹ Population figures are based upon 2010 US Census Block Data

¹ Population figures are based upon 2010 US Census Block Data

² Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

² Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

	Existing PCS LTE Coverage Gap	
Population:¹	(≥ -86 dBm)	9,804
	(≥ -96 dBm)	9,001
<hr/>		
Business Pops:²	(≥ -86 dBm)	1,628
	(≥ -96 dBm)	1,387
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Area (mi²):	(≥ -86 dBm)	22.41
	(≥ -96 dBm)	21.11
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Roadway (mi):	Main (-96 dBm):	9.5
	Secondary (-96 dBm):	77.9
	Total (-96 dBm):	87.4

	Incremental Coverage from Proposed Site (PCS)	
Population:¹	(≥ -83 dBm)	128
	(≥ -93 dBm)	471
<hr/>		
Business Pops:²	(≥ -83 dBm)	43
	(≥ -93 dBm)	96
<hr/>		
Area (mi²):	(≥ -83 dBm)	0.33
	(≥ -93 dBm)	1.13
<hr/>		
Roadway (mi):	Main (-93 dBm):	0.1
	Secondary (-93 dBm):	4.7
	Total (-93 dBm):	4.8

¹ Population figures are based upon 2010 US Census Block Data

¹ Population figures are based upon 2010 US Census Block Data

² Employee population counts are based upon the 2011 U.S. Census Bureau LEHD² Employee population counts are based upon the 2011 U.S. Census Bureau database.

LEHD database.

	Existing AWS LTE Coverage Gap	
Population: ¹	(≥ -86 dBm)	10,723
	(≥ -96 dBm)	9,462
<hr/>		
Business Pops: ²	(≥ -86 dBm)	2,344
	(≥ -96 dBm)	1,587
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Area (mi²):	(≥ -86 dBm)	24.28
	(≥ -96 dBm)	22.23
<hr/>		
Roadway (mi):	Main (-96 dBm):	9.9
	Secondary (-96 dBm):	82.2
	Total (-96 dBm):	92.1

	Incremental Coverage from Proposed Site (AWS)	
Population: ¹	(≥ -83 dBm)	77
	(≥ -93 dBm)	318
<hr/>		
Business Pops: ²	(≥ -83 dBm)	32
	(≥ -93 dBm)	72
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Area (mi²):	(≥ -83 dBm)	0.21
	(≥ -93 dBm)	0.78
<hr/>		
Roadway (mi):	Main (-93 dBm):	0.0
	Secondary (-93 dBm):	3.4
	Total (-93 dBm):	3.4

¹ Population figures are based upon 2010 US Census Block Data

² Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

¹ Population figures are based upon 2010 US Census Block Data

² Employee population counts are based upon the 2011 U.S. Census Bureau LEHD database.

ATTACHMENT 5



REMOTE FIELD REVIEW



**CONNECTICUT SITING COUNCIL DOCKET NO. 487
NEW CANAAN NORTHEAST
183 SOUNDVIEW LANE
NEW CANAAN, CT 06840**

PREPARED FOR:



PREPARED BY:

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

Photographed June 25, 2020

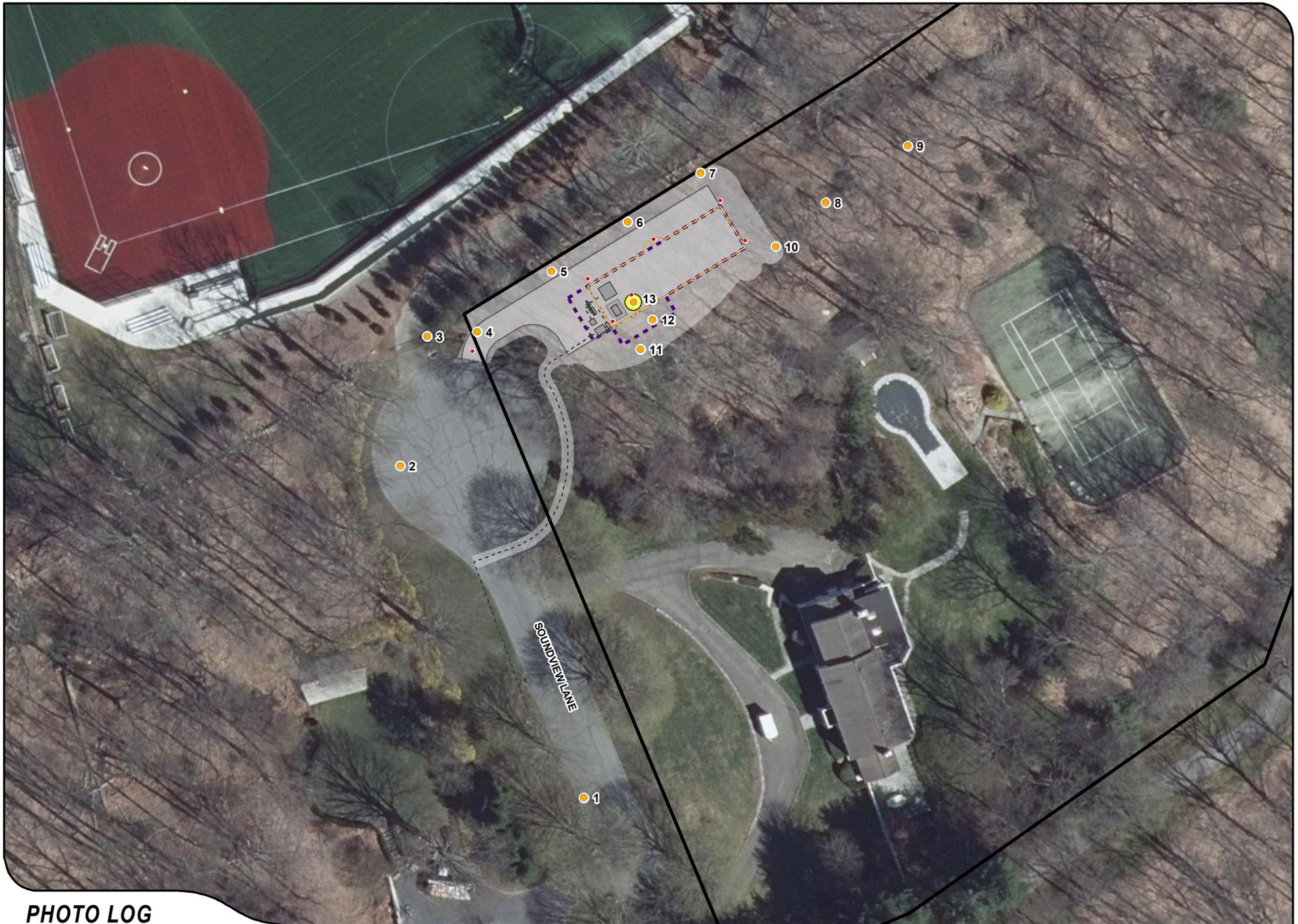
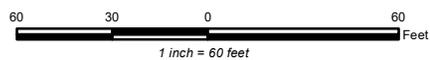


PHOTO LOG

- Photo Locations Monopine - - - Underground Electric/Telco
- Photo Marker Lease Area — Compound Fence
- Property Boundary Concrete Pad — Edge of Gravel Access Road
- Limits of Disturbance Equipment Gravel Access & Compound





PHOTOGRAPHED ON 5/25/2020

EXISTING

PHOTO

1

DESCRIPTION

SOUNDVIEW LANE LOOKING NORTH



PHOTOGRAPHED ON 5/25/2020

EXISTING

PHOTO

2

DESCRIPTION

SOUNDVIEW LANE LOOKING NORTHEAST



CENTER OF PROPOSED ACCESS ROAD

EXISTING

PHOTO

3

DESCRIPTION

SOUNDVIEW LANE LOOKING SOUTHEAST

PHOTOGRAPHED ON 5/26/2020



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

4

DESCRIPTION

STANDING AT PROPOSED ACCESS ROAD LOOKING SOUTH



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

5

DESCRIPTION

NORTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING SOUTHEAST



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

5A

DESCRIPTION

NORTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING NORTH TOWARDS ST. LUKE'S SCHOOL



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

6

DESCRIPTION

NORTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING SOUTHEAST



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

6A

DESCRIPTION

NORTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING NORTH TOWARDS ST. LUKE'S SCHOOL



SOUTHEAST CORNER OF PROPOSED COMPOUND

NORTHEAST CORNER OF PROPOSED COMPOUND

PHOTOGRAPHED ON 5/25/2020

EXISTING

PHOTO

7

DESCRIPTION

NORTHEAST EDGE OF LIMITS OF DISTURBANCE - LOOKING SOUTHEAST



PHOTOGRAPHED ON 5/25/2020

EXISTING

PHOTO

8

DESCRIPTION

APPROXIMATELY 50 FEET EAST OF COMPOUND - FOUR CARDINAL POINTS



NORTH



EAST



SOUTH



WEST

EXISTING

PHOTO

9

DESCRIPTION

APPROXIMATELY 90 FEET EAST OF COMPOUND - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 5/25/2020



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

10

DESCRIPTION

SOUTHEAST LIMITS OF DISTURBANCE - LOOKING NORTHWEST



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

10A

DESCRIPTION

SOUTHEAST LIMITS OF DISTURBANCE - LOOKING SOUTHEAST TOWARDS EXISTING POOL HOUSE



PHOTOGRAPHED ON 5/26/2020

EXISTING

PHOTO

11

DESCRIPTION

SOUTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING SOUTHEAST TOWARDS EXISTING RESIDENCE



PHOTOGRAPHED ON 5/25/2020

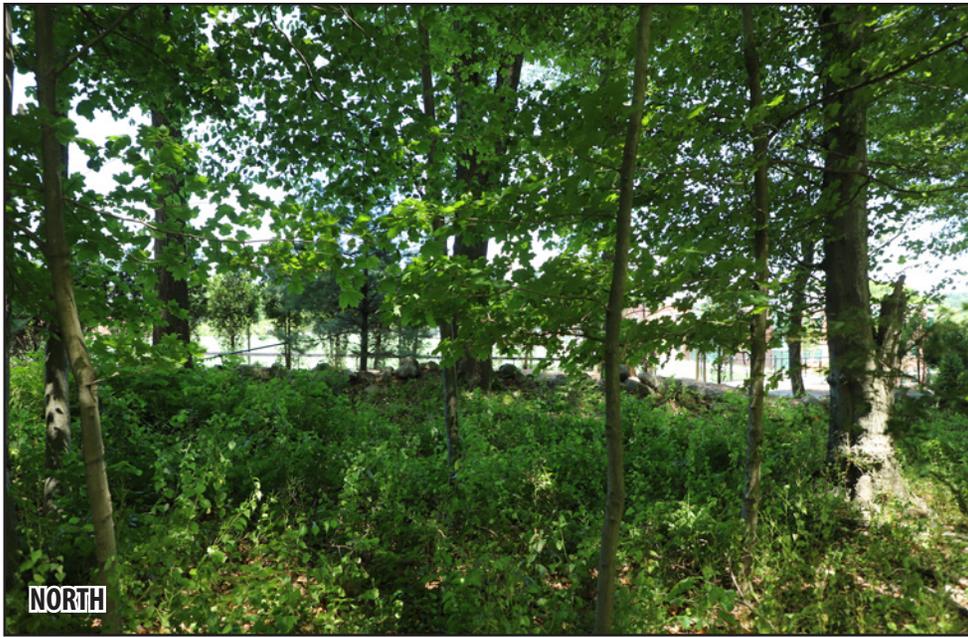
EXISTING

PHOTO

12

DESCRIPTION

NEAR SOUTH CENTRAL EDGE OF LIMITS OF DISTURBANCE - LOOKING NORTHWEST



NORTH



EAST



SOUTH



WEST

EXISTING

PHOTO

13

DESCRIPTION

CENTER OF PROPOSED TOWER - FOUR CARDINAL POINTS

PHOTOGRAPHED ON 5/25/2020