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August 30, 2007

TO: Parties and Intervenors

FROM: S. Derek Phelps, Executive Director

RE: **DOCKET NO. 333** – Lighttower application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at 17 Cottage Road, Madison, Connecticut.



As stated at the hearing in Madison on June 20, 2007, after the Council issues its draft findings of fact, parties and intervenors may identify errors or inconsistencies between the Council's draft findings of fact and the record; however, no new information, evidence, argument, or reply briefs will be considered by the Council.

Parties and Intervenors may file written comments with the Connecticut Siting Council on the Draft Findings of Fact issued on this docket by September 18, 2007.

SDP/cm

Enclosure

DOCKET NO. 333 – National Grid Wireless, Inc. application } Connecticut
for a Certificate of Environmental Compatibility and Public }
Need for the construction, maintenance and operation of a } Siting
telecommunications facility located at 17 Cottage Road, } Council
Madison, Connecticut. }

August 13, 2007

DRAFT Findings of Fact

Introduction

1. National Grid Wireless, Inc. (NGW), in accordance with provisions of Connecticut General Statutes (CGS) § 16-50g through 16-50aa, applied to the Connecticut Siting Council (Council) on April 2, 2007 for the construction, operation, and maintenance of a wireless telecommunications facility at 17 Cottage Road in Madison, Connecticut. (NGW 1, p. 1)
2. NGW is a Massachusetts corporation, which does not conduct any business in the State of Connecticut other than the provision of tower facilities and services to personal communications services carriers. NGW would construct and maintain the proposed facility. (NGW 1, p. 3)
3. The party in this proceeding is the applicant. The intervenor in this proceeding is Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. (T-Mobile). (Transcript of June 20, 2007, 3:04 p.m. [Tr. 1], pp. 5, 6)
4. The purpose of the proposed facility is to provide service to coverage gaps within the Town of Madison along the Route 1 (Boston Post Road) corridor in the vicinity of the southern section of the Hammonasset Connector, Hammonasset State Park, the former Griswold Airport property, local roads and adjacent commercial and residential areas. (NGW 1, pp. 1, 2)
5. Pursuant to CGS § 16-50m, the Council, after giving due notice thereof, held a public hearing on June 20, 2007, beginning at 3:00 p.m. and continuing at 7:00 p.m. at the Memorial Town Hall Upper, 8 Meetinghouse Lane, Madison, Connecticut. (Tr. 1, p. 3; Transcript of July 20, 2007, 7:01 p.m. [Tr. 2], p. 3)
6. The Council and its staff conducted an inspection of the proposed site on June 20, 2007, beginning at 2:00 p.m. During the field inspection, the applicant flew a balloon approximately 20 feet from the proposed site in front of the existing vegetation to simulate the height of the proposed tower. The balloon flew at a height of 138 feet above ground level to account for a difference in elevation between the proposed site and the area where the balloon was flown. The balloon was aloft beginning at approximately 11:00 a.m. until 6:30 p.m. and remained upright for most of that time. (Tr. 1, pp., 11, 12; Tr. 2, p. 4)
7. NGW installed a sign near the access road of the proposed site on June 9, 2007 to notify the public of the proposed project. (NGW 2, R. 2)
8. Pursuant to CGS § 16-501 (b), public notice of the application was published in The Source, which is a weekly publication, on March 29 and April 5, 2007 and in The Shoreline Times on March 28 and March 30, 2007. (NGW 1, p. 4; NGW 2, R. 1; Affidavits of Publication)

9. Pursuant to CGS § 16-50l(b), notice of the application was provided to all abutting property owners by certified mail, return receipt requested. One adjacent landowner, the State of Connecticut, did not return notice. NGW provided an additional notice via first class mail to the State of Connecticut, Bureau of Land Management to ensure notice of the application. (NGW 1, p. 4, Tab 10; NGW 2, R. 2, 3)
10. Pursuant to CGS § 16-50l (b), NGW provided notice to all federal, state and local officials and agencies listed therein. (NGW 1, Tab 8)

State Agency Comment

11. Pursuant to CGS § 16-50j (h), on May 21, 2007 and June 21, 2007, the following State agencies were solicited by the Council to submit written comments regarding the proposed facility; Department of Environmental Protection (DEP), Department of Public Health (DPH), Council on Environmental Quality (CEQ), Department of Public Utility Control (DPUC), Office of Policy and Management (OPM), Department of Economic and Community Development (DECD), and the Department of Transportation (DOT). (Record)
12. The Council received a response letter from the DPH dated June 11, 2007 stating that it has no comments at this time. The DOT also provided a response letter dated June 11, 2007, stating that it has no comments. (Council Admin. Notice State Agency comments Nos. 1, 2; Record)
13. The State Historic Preservation Office (SHPO) provided an e-mail to NGW on June 19, 2007 and followed up with a letter dated June 20, 2007. The SHPO determined that the proposed project would have no adverse effect on cultural resources with the condition that if the facility is not in use for six consecutive months, the telecommunications facility owner shall remove the tower and equipment. This removal shall occur within 90 days of the end of such six-month period. (Council Admin. Notice State Agency comments No. 3; Record)
14. The following agencies did not respond with comment on the application: DEP, CEQ, DPUC, OPM and DECD. (Record)

Municipal Consultation

15. On November 8, 2006, NGW submitted a technical report to the First Selectman of the Town of Madison regarding the proposed site. On January 4 and January 18, 2007, NGW and T-Mobile representatives met with the Planning and Zoning Commission for public information sessions on the proposed facility. At the meeting on January 18, 2007, the Planning and Zoning Commission made several recommendations including:
 - a. Minimization of tree clearing and removal to maximize screening;
 - b. Avoidance of movement of the tower location in any direction that would increase visibility;
 - c. The access drive should remain gravel and a curve should be designed into the driveway to minimize visibility of the site;
 - d. Design of the proposed 130-foot tower to allow a future expansion to 150 feet in the future, if needed.(NGW 1, p. 17, Tab 7)
16. NGW addressed all concerns of the Planning and Zoning Commission in the design of the proposed facility. (NGW 1, p. 17)

17. The Madison Police Department would install a 10-foot whip antenna at the 75-foot level of the tower and a small equipment cabinet inside the compound. NGW is willing to provide space at the proposed facility for municipal public safety and emergency communications for no compensation. (NGW 1, p. 10, 18)

Public Need for Service

18. In 1996, the United States Congress recognized a nationwide need for high quality wireless telecommunications services, including cellular telephone service. Through the Federal Telecommunications Act of 1996, Congress seeks to promote competition, encourage technical innovations, and foster lower prices for telecommunications services. (Council Administrative Notice Item No. 7)
19. In issuing cellular licenses, the federal government has preempted the determination of public need for cellular service by the states, and has established design standards to ensure technical integrity and nationwide compatibility among all systems. T-Mobile is licensed by the Federal Communications Commission (FCC) to provide personal wireless communication service to New Haven County, Connecticut. (Council Administrative Notice Item No. 7; NGW 1, pp. 6, 7)
20. The Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services. (Council Administrative Notice Item No. 7)
21. The Telecommunications Act of 1996, a Federal law passed by the United States Congress, prohibits any state or local entity from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions to the extent that such towers and equipment comply with FCC's regulations concerning such emissions. This Act also blocks the Council from prohibiting or acting with the effect of prohibiting the provision of personal wireless service. (Council Administrative Notice Item No. 7)
22. In an effort to ensure the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the 911 Act). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. (NGW 1, pp. 6, 7)
23. As an outgrowth of the 911 Act, the FCC mandated wireless carriers to provide enhanced 911 services (E911) as part of their networks. E911 allows public safety dispatchers to identify the geographical location of a wireless caller within several hundred feet. The proposed facility would be an integral component of T-Mobile's E911 network in this area. (NGW 1, p. 9)

Site Selection

24. NGW established a search ring for the target service area in early 2005. The search ring has an approximately 5,000-foot diameter and encompasses the Hammonasset Connector. (NGW 1, p. 8, Tab 4; NGW 2, R. 4)

25. NGW identified ten existing towers within a three and one-half mile radius of the target area. T-Mobile is located on five of the ten existing towers. The locations of the existing towers are:

Address	Height	Approximate Distance & Direction
665 Boston Post Road, Madison	40-foot lattice	1.8 miles west-southwest
8 Old Route 79, Madison	150-foot monopole (T-Mobile at 120 feet)	2.2 miles west-northwest
35 New Road, Madison	190-foot guyed lattice (T-Mobile at 162 feet)	1.5 miles northwest
21 East Main Street, Clinton	65-foot lattice (T-Mobile at 55 feet)	1.8 miles east
49 East Main Street, Clinton	60-foot lattice	2 miles east
48 East Main Street, Clinton	75-foot lattice	1.9 miles east
40 Cow Hill Road, Clinton	223-foot lattice (T-Mobile at 142 feet)	1.5 miles northeast
64 West Main Street, Clinton	40-foot lattice	1.5 miles east
170 East Main Street, Clinton	150-foot monopole	2.5 miles east
46 Meadow Street, Clinton	195-foot lattice (T-Mobile at 195 feet)	3.3 miles east

(NGW 1, Tab 4; NGW 2, R. 20)

26. After determining there were not existing structures suitable to provide the necessary coverage, NGW began to search for large parcels of undeveloped land, commercial sites and municipally owned properties to accommodate a telecommunications tower. NGW investigated 26 parcels/areas, including the proposed site.

Parcel	Reason for rejection
Hammonasset State Park	DEP prohibits development on this parcel
Boston Post Road (DEP parcel west of Hammonasset Connector)	Ten residents abut the property; and a wetlands and/or wetlands buffer crossing would be required to access the site.
Boston Post Road (undeveloped DEP parcel)	Would not provide adequate coverage
Devron Drive	Deed restricted Open Space
Mill Road (DEP parcel)	Abuts residences along Mill Road and Todd's Mill Circle
Cottage Road	Property owners do not want to lease property
1163 Boston Post Road	Would not provide adequate coverage
1291 Boston Post Road	Property owner does not want to lease property
1306 Boston Post Road	Too small (0.39 acres) to support proposed facility
1309 Boston Post Road	Too developed (Lenny & Joe's Fish Tail) to accommodate proposed facility
1315 Boston Post Road	Too developed/high traffic retail site
1320 Boston Post Road	Too small (0.46 acres)
1321 Boston Post Road	Too narrow (96 feet)
1324 Boston Post Road	Too small (0.28 acres)
1333 Boston Post Road	Too small (0.46 acres) and developed
1334 Boston Post Road	Too developed (gas station/convenience store/car wash)
1339 Boston Post Road	Property owner does not want to lease property
1343 Boston Post Road	Property owner does not want to lease property
1347 Boston Post Road	Property owner does not want to lease property
1353 Boston Post Road	Too small and contains commercial offices
1359 Boston Post Road	Too small (0.40 acres)
1362 Boston Post Road	Property owner does not want to lease property; and would not provide adequate coverage
Boston Post Road (adjacent to Griswold Airport)	Would not provide adequate coverage
55 Dudley Lane/63 Dudley Lane/67 Dudley Lane	Too developed with summer cottages (an average of 11.9 cottages per acre)
Boston Post Road (DEP parcel)	DEP would have to conduct an official Request for Proposal process to lease space and has no intent to do so

(NGW 1, pp. 8, 9, Tab 4)

27. Microcells, repeaters and distributed antenna systems are not viable technological alternatives for providing coverage to the identified coverage gap. (NGW 1, p. 7)

Site Description

28. The proposed site is located in the northwest corner of an approximately 1.8 acre property located at 17 Cottage Road in Madison. The parcel, owned by Dr. Paul Stonehart, contains two office buildings and associated parking areas. The proposed site is depicted on Figure 1. (NGW 1, 10)
29. The property zoned commercial (CA-1). The Town of Madison's Zoning Regulations do not include specific standards for regulations of wireless facilities. The town's Plan of Conservation and Development recommends improvements in infrastructure to meet the needs of the residents and businesses. The Plan also encourages co-location to minimize the number of towers to serve the town. (NGW 1, p. 15)
30. The ground elevation of the proposed site is 27.5 feet above mean sea level (amsl). (NGW 1, Tab 5)
31. The proposed facility would consist of a 130-foot monopole within a 62-foot 6-inch by 64-foot lease area. The tower and foundation would be designed to accommodate a future extension to 150 feet above ground level (agl). The tower would be constructed to accommodate the four carriers that are currently active in the Connecticut marketplace. (NGW 1, p. 10, Tab 5)
32. The proposed tower would have an approximately 50-inch diameter at the base and taper to approximately 25 inches at the top. Construction of the tower would be in accordance with the American National Standards Institute TIA/EIA-222-F "Structural Standards for Steel Antenna Towers and Antenna Support Structures." (NGW 1, p. 10, Tab 5; NGW 2, R. 23)
33. The bottom platform on the proposed structure would be at 100 feet agl. (Tr. 1, p. 15)
34. T-Mobile would install up to 12 panel antennas on a full platform with a centerline of 117 feet agl. (NGW 1, p. 9; NGW 2, R. 6; T-Mobile 2, R. 1, 9)
35. Cellco Partnership d/b/a Verizon Wireless (Verizon) submitted a letter to the Council on July 5, 2007 stating Verizon's interest in locating antennas at the 127-foot level of the proposed tower. (Record/limited appearance)
36. NGW considered the construction of the a "stick" style tower at the proposed site but concluded that a traditional monopole would be better able to accommodate the four wireless carriers, the Madison Police Department, and potentially the Madison Fire Department. (NGW 2, R. 19)
37. A 60-foot by 60-foot compound would be enclosed by an eight-foot high security fence at the base of the proposed tower. T-Mobile would locate equipment cabinets within the compound. Space would be available within the compound for three additional carriers. Battery back up would be used in case of a power failure. (NGW 1, p. 9, Tab 5; T-Mobile 2, R. 2)
38. The property owner, Dr. Stonehart, works in the development of fuel cell technology. NGW has discussed with Dr. Stonehart the possibility of installing a fuel cell at the proposed site. If used, a fuel cell would likely initially be used for standby power, and potentially in the future for operational power. (Tr. 1, p. 13)
39. T-Mobile is investigating the use of fuel cells as an alternate back up power source; however, T-Mobile's corporate headquarters have not approved any fuel cells as acceptable and reliable power sources. (T-Mobile 2, R. 2)

40. Minimal grading would be required for the construction of the proposed access road and compound. The proposed site is located within a level portion of the host property. (NGW 1, p. 10, Tab 5)
41. Access to the proposed site would be via a new gravel road extending northward from Cottage Road for a distance of approximately 360 feet, then turning northwest and continuing for a distance of approximately 40 feet. Utilities would extend underground parallel to the access drive to the proposed site. (NGW 1, p. 10, Tab 5)
42. The tower setback radius would extend onto adjacent properties to the north (by approximately 60 feet), east (by approximately 12 feet) and west (by approximately 80 feet). NGW would be willing to design a yield point into the proposed tower to minimize the tower setback radius, if ordered by the Council. (NGW 1, Tab 5)
43. The property to the north, owned by Strathmore Farms Development Company, is a parcel of dedicated open space associated with the Strathmore Farms Subdivision, which is to the north of the open space property. The property to the east, owned by Robert and Allyce Dowler, has received approval for the construction of a three-story office building. A second office building may be built on the other Dowler-owned property to the southeast of the proposed site. (NGW 2, R. 10)
44. The nearest property boundary from the proposed site is approximately 18 feet to the west, which is the boundary with the Hammonasset Connector. (NGW 1, Tab 5)
45. There are 23 residences within a 1,000-foot radius of the proposed tower site. The nearest residence, owned by Louis E. and Cynthia S. Ursini, is approximately 480 feet to the north of the tower site. (NGW 2, R. 11, 12)
46. Land use in the surrounding area consists of undeveloped commercial property, deeded open space parcels and state-owned property. (NGW 1, Tab 5)
47. The estimated construction cost of the proposed facility, not including radio equipment and antennas, is:

Tower foundation (incl. installation)	\$ 70,000
Site development	105,000
Utility installation	50,000
Total	\$ 225,000

(NGW 1, p. 19)

Environmental Considerations

48. An archaeological reconnaissance study of the proposed site indicated that no prehistoric or historic archaeological resources are located within the project area. A State Park Supply Yard is located at 51 Mill Road in Madison, approximately 650 feet from the proposed site, and listed on the National Register of historic places. The DEP owns the State Park Supply Yard and uses it for vehicle and equipment maintenance and storage. The historical significance of the property is due to its social history as a Civilian Conservation Corps site. (NGW 1, pp. 12, 13)

49. The State Park Supply Yard property was listed as a thematic resource in 1986. Between 1933 and 1935 the Civilian Conservation Corps built seven structures on the property. The property and structures were listed as a resource associated with the Connecticut State Park and Forest Depression Era Federal Work Relief Programs; however, not all of the structures currently exist. (NGW 2, R. 13)
50. NGW provided the SHPO with photographs of the State Park Supply Yard as well as photosimulations of the proposed site. On June 11, 2007, NGW representatives met with Historical Architect Susan Chandler to discuss the proposed project. SHPO determined that the proposed project would have no adverse effect on cultural resources with the condition that if the facility is not in use for six consecutive months, the telecommunications facility owner shall remove the tower and equipment. (NGW 2, R. 13; SHPO comment letter dated June 20, 2007)
51. There are no known extant populations of federal or state Endangered, Threatened or Special Concern Species at the proposed site. (NGW 1, p. 13, Tab 6)
52. Seven trees with a diameter of six inches or greater would have to be removed for the construction of the proposed site and access road. (NGW 2, R. 14)
53. Vegetation at the proposed site consists of Black Cherry, Red Oak, Sassafras, Shagbark Hickory, Staghorn Sumac, Sugar Maple, White Oak, White Pine and Yellow Birch. Brush is present along the eastern property boundary and along a portion of the southern boundary and a forested area abuts the property to the west. The average tree height in the area of the proposed site is approximately 65 feet above ground level. (NGW 2, R. 15, 16)
54. No blasting is anticipated for the construction of the proposed facility. (NGW 2, R. 8)
55. There are no wetlands or watercourses within or near the proposed site. The nearest wetlands to the proposed site are located across Cottage Road, approximately 500 feet to the south. (NGW 1, p. 16, NGW 2, R. 17)
56. The nearest boundary of Hammonasset State Park is approximately 800 feet south of the proposed site. The main entrance to the park is located approximately one half mile south of the proposed site. The Hammonasset beach is located approximately $\frac{3}{4}$ of a mile south of the proposed site. (NGW 2, R. 18)
57. The nearest active airport is Tweed New Haven Airport, which is located approximately 14.5 miles to the west of the proposed site. The proposed monopole would not require marking or lighting by the Federal Aviation Administration. (NGW 1, p. 18; NGW 2, R. 5)
58. The maximum power density from the radio frequency emissions of T-Mobile's proposed antennas would be 0.084 mW/cm^2 or 8.4% of the standard for Maximum Permissible Exposure, as adopted by the FCC, at the base of the proposed tower. This calculation was based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) that assumes all antennas would be pointed at the base of the tower and all channels would be operating simultaneously. (NGW 1, Tab 5)

Visibility

59. The proposed tower would be visible year-round from approximately 2,709 acres within a two-mile radius of the site (refer to Figure 1). The proposed tower would be seasonally visible from an additional approximately nine acres within a two-mile radius of the site. (NGW 1, Tab 5)
60. The visibility of the proposed site from roads within a two-mile radius of the proposed site is:

Road	Length of Year-Round Visibility	Length of Seasonal Visibility
Route 1	2,200 feet	-
Hammonasset Connector	1,100 feet	-
Mill Road	700 feet	550 feet
Cottage Road	450 feet	-
Deveron Drive	900 feet	240 feet
Edinburgh Lane	650 feet	250 feet
Todd's Mill Circle	150 feet	250 feet
Highland Circle	700 feet	250 feet

(NGW 1, Tab 5)

61. The proposed tower would be visible year-round from five residences along Highland Drive, ten residences along Deveron Drive, six residences along Edinburgh Lane, and two residences along Mill Road. The tower would also be visible from the State Park Supply Yard and Hammonasset State Park, which are both sensitive visual receptors. (NGW 1, Tab 5)
62. The proposed tower would be seasonally visible from an additional three residences along Deveron Drive, three residences along Highland Avenue, three residences along Edinburgh Lane, one residence along Mill Road and two residences along Todd's Mill Circle. (NGW 1, Tab 5)

63. Visibility of the proposed tower from specific locations within a two-mile radius of the site is presented in the table below. The numbers in the locations column of the table correspond to the numbers of the photograph locations shown in Figure 1 of this document.

Location	Visible	Approx. Portion of Tower Visible	Approx. Distance from Tower Location
1. Intersection of Hammonasset Connector and Route 1	Yes	40 feet – unobstructed	0.16 miles south
2. Deveron Drive	Yes	10 feet – unobstructed	0.13 miles north
3. Intersection of Cottage Road and Mill Road	No	-	0.10 miles southeast
4. Intersection of Laurel Crest Road and Stanton Court	No	-	0.3 miles northwest
5. Intersection of Madrina Lane and Signal Hill Road	No	-	0.29 miles southwest
6. Intersection of Todd’s Mill Circle and Mill Road	Yes	35 feet – unobstructed	0.12 miles northeast
7. Hammonasset Park: Meigs Point Nature Center	Yes	Distant view	1.7 miles south
8. Hammonasset Park: Beach	Yes	Distant view	1.5 miles south
9. Hammonasset Park: William F. Miller Campground	Yes	50 feet – unobstructed distant view	0.58 miles southwest
10. Hammonasset Park: Collection Booths	Yes	30 feet – unobstructed	0.41 miles southeast
11. Historic Alis-Bushnell House	No	-	1.65 miles west
12. Historic Meigs-Bishop House	No	-	1.76 miles west
13. Historic Jonathan Murray House	No	-	1.22 miles northwest
14. Clinton Village Historic District	No	-	1.86 miles east
15. Pratt Road	No	-	1.1 miles southeast
16. Highland Drive	Yes	30 feet – unobstructed distant view	0.98 miles east
17. Downing Way	No	-	0.45 miles northeast
18. Intersection of Kingsbridge Way and River Road	No	-	0.49 miles north
19. Edinburgh Lane	Yes	20 feet – unobstructed	0.28 miles northwest
20. Cottage Road	Yes	10 feet year-round 30 feet seasonally	0.16 miles southeast
21. Hammonasset Connector	Yes	35 feet year-round 50 feet seasonally	0.08 miles northwest

(NGW 1, Tab 5)

64. The proposed structure would be visible from the Historic State Park Supply Yard located at 51 Mill Road (approximately 650 feet northeast) and a majority of Hammonasset State Park. (NGW 1, Tab 5)

Existing and Proposed Wireless Coverage – T-Mobile

65. T-Mobile operates PCS service using frequencies in the 1900 MHz range. T-Mobile designs for a signal level threshold of -84 dBm for in-vehicle coverage and -76 dBm for in-building coverage. (T-Mobile 1, Tab 2, Tab 3; T-Mobile 2, R. 6)

66. T-Mobile needs the proposed site to provide coverage along the southern portion of the Hammonasset Connector, Route 1 and surrounding areas. T-Mobile currently has an approximately one-mile coverage gap along the Hammonasset Connector and approximately 3.1-mile gap along Route 1. Coverage from existing T-Mobile sites is shown in Figure 3 of this document. (T-Mobile 1, Tab 2)
67. At the 117-foot level, T-Mobile antennas could provide one mile of coverage along southern portion of the Hammonasset Connector and approximately 2.3 miles of coverage along Route 1. In addition, coverage would extend over the water of Long Island Sound. Coverage from existing T-Mobile sites and the proposed site at 117 feet agl is shown in Figure 4 of this document. (T-Mobile 1, Tab 2, Tab 3; Tr. 1, p. 44)
68. An approximately 0.8 mile coverage gap would remain along Route 1 to the west of the proposed site. A hill along Route 1 would prohibit coverage from the proposed site to continue west, regardless of an increase in antenna height. (T-Mobile 1, Tab 3; Tr. 1, pp. 42, 43)
69. T-Mobile would require a site in the future located to the west of the proposed site; however, no formal search ring currently exists. (Tr. 1, p. 43)

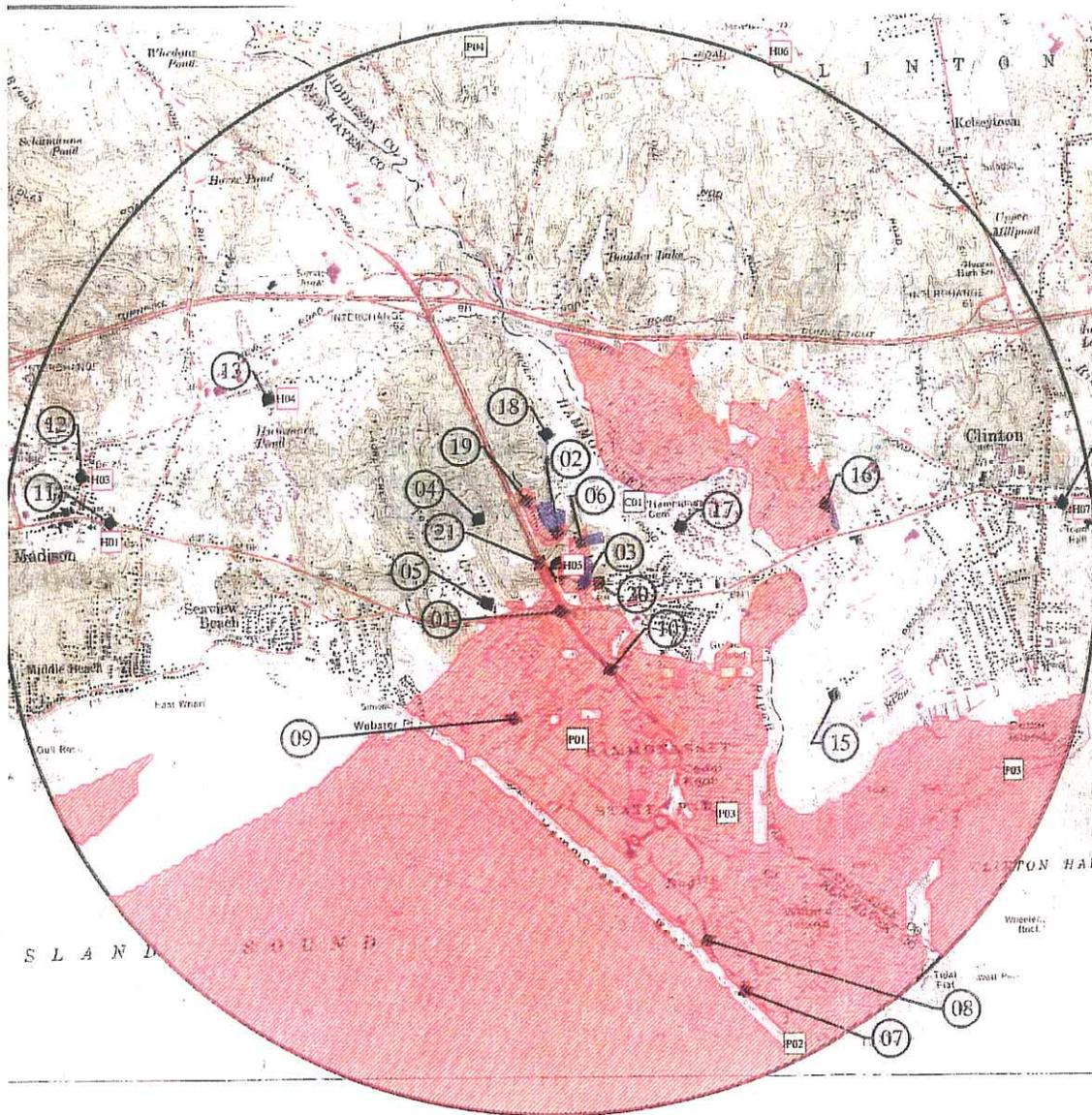


Figure 1. Visibility of the proposed 130-foot tower within a two-mile radius. (NGW 1, Tab 5)

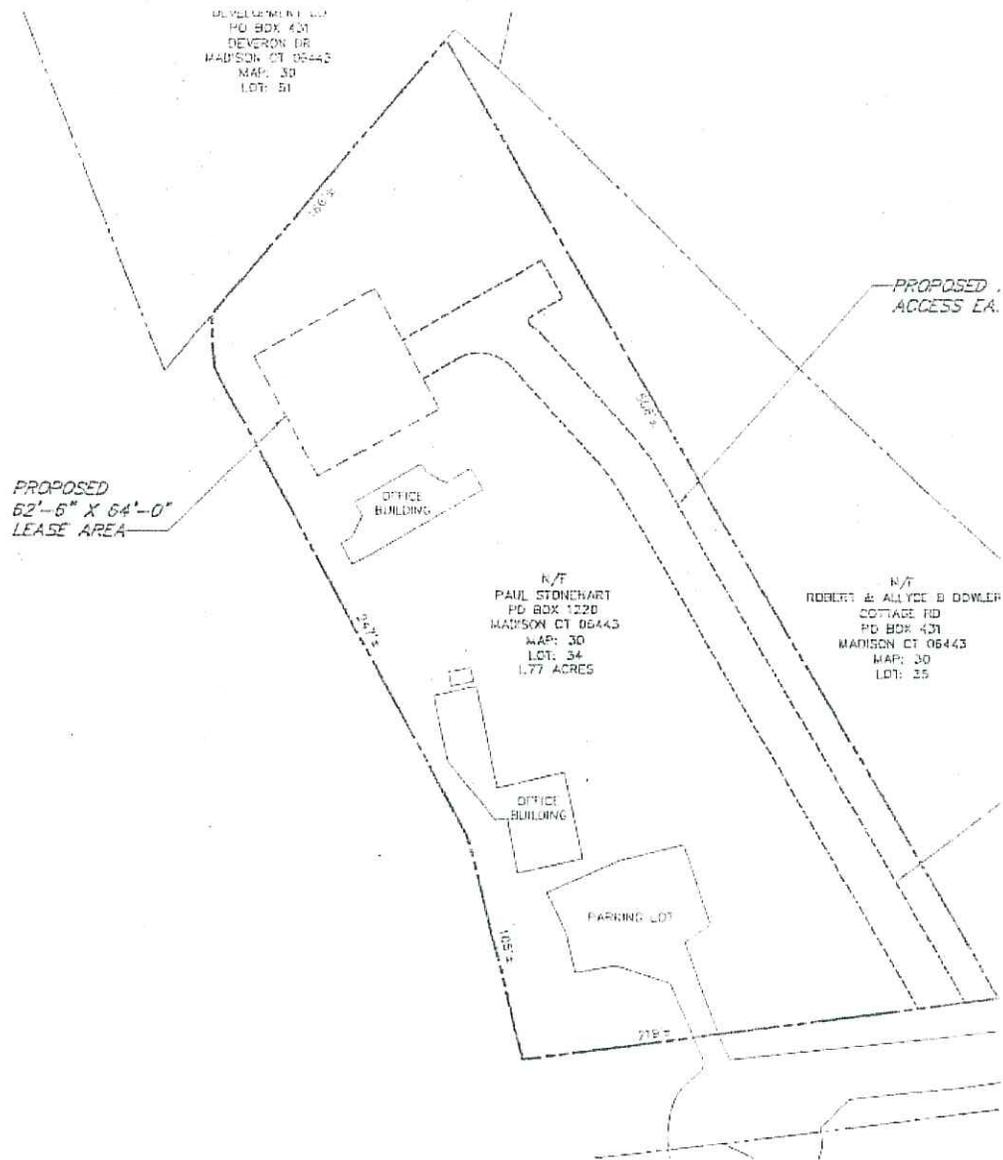


Figure 2. Site drawing showing proposed site on the host property. (NGW 1, Tab 5)

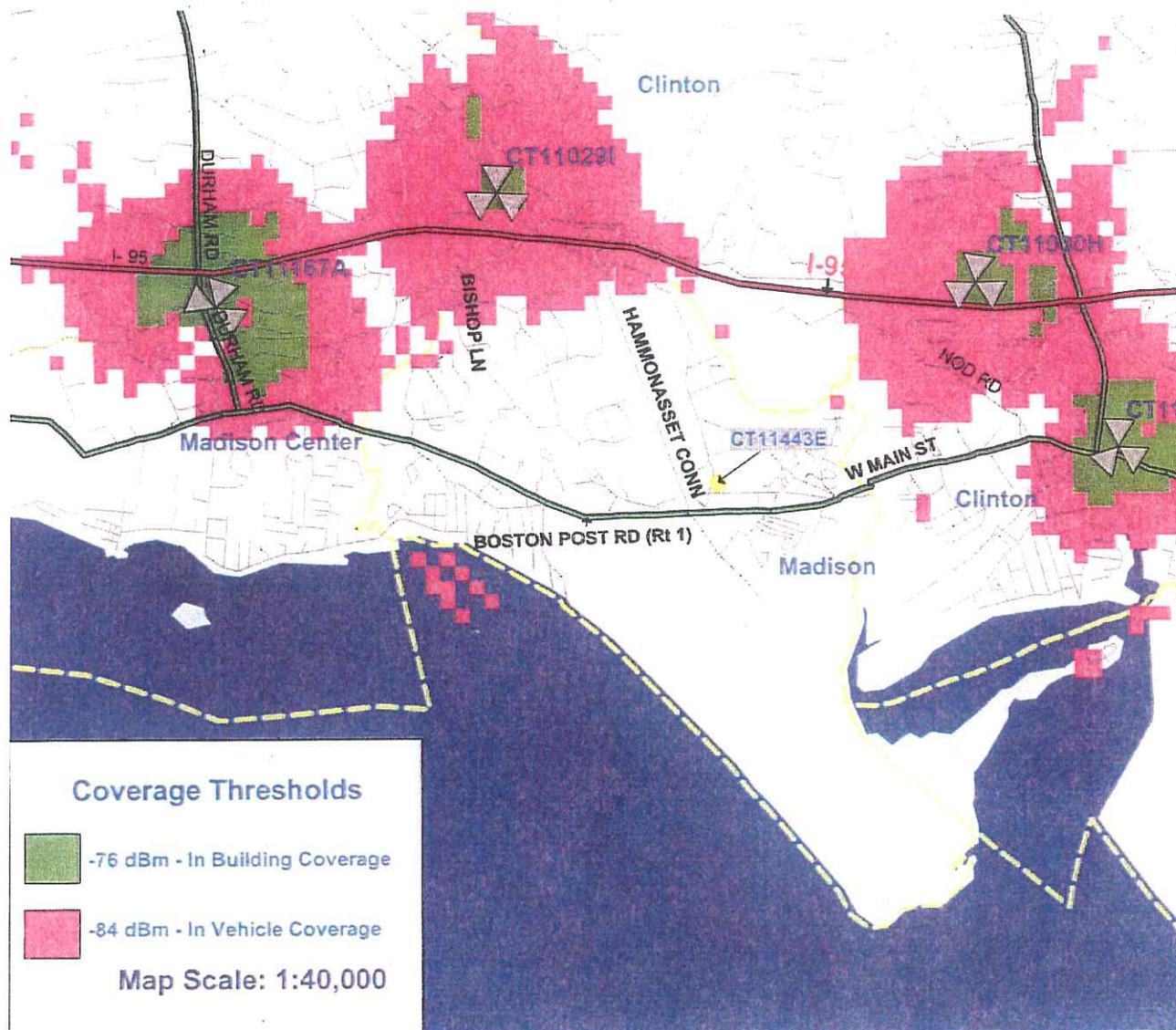


Figure 3. Existing T-Mobile coverage surrounding the proposed site. (T-Mobile 1, Tab 3)