

<p><b>DOCKET NO. 446</b> - Cellco Partnership d/b/a Verizon Wireless }  application for a Certificate of Environmental Compatibility and }  Public Need for the construction, maintenance, and operation of a }  telecommunications facility located at the Pilot Corporation of }  America property, Trumbull Tax Assessor Map K/09 Lot 20, 60 }  Commerce Drive, Trumbull, Connecticut.</p>	<p>Connecticut  Siting  Council  June 26, 2014</p>
---	--

**Findings of Fact**

**Introduction**

1. Cellco Partnership d/b/a Verizon Wireless (Cellco), in accordance with provisions of Connecticut General Statutes (C.G.S.) § 16-50g, et seq., applied to the Connecticut Siting Council (Council) on February 26, 2014 for the construction, maintenance, and operation of a wireless telecommunications facility at 60 Commerce Drive in Trumbull, Connecticut (refer to Figure 1). (Cellco 1, p. 1)
2. On March 20, 2014, the Council deemed the application complete and approved a schedule for this application. (Connecticut Siting Council Meeting Minutes, March 20, 2014)
3. Cellco is a Delaware limited liability company with an office at 90 East River Drive, East Hartford, Connecticut. Cellco is licensed by the Federal Communications Commission (FCC) to construct and operate a personal wireless services system. The company does not conduct any business in the State of Connecticut other than the provision of wireless services under FCC rules and regulations. (Cellco 1, p. 4)
4. The party in this proceeding is Cellco. (Transcript 1-April 29, 2014-3:00 p.m. [Tr. 1], p. 4)
5. The purpose of the proposed facility is to provide reliable wireless telecommunications services for Cellco in the western portion of Trumbull and the northern portion of Stratford. (Cellco 1, Tab 6 maps)
6. Pursuant to C.G.S. § 16-50l (b), public notice of the filing of the application to the Council was published in the Connecticut Post on February 21 and 22, 2014. (Cellco 2)
7. Pursuant to C.G.S. § 16-50l(b), notice of the application filing was provided to all abutting property owners by certified mail. Mail return receipts were received from all of the abutters. (Cellco 3, response 1)
8. Pursuant to C.G.S. § 16-50l (b), Cellco provided notice to all Federal, State and local officials and agencies listed therein, including representatives from the Town of Stratford, which is located within 2,500 feet. (Cellco 1, Tab 2)
9. Pursuant to C.G.S. § 16-50j-21, Cellco installed a four-foot by six-foot sign near the entrance driveway to the site property on April 16, 2014. The sign presented information regarding the project and the Council’s public hearing. (Cellco 4).
10. Pursuant to C.G.S. § 16-50m, the Council, after giving due notice thereof, held a public hearing on April 29, 2014, beginning at 3:00 p.m. and continuing at 7:00 p.m. at the Trumbull Town Hall, 5866 Main Street, Trumbull, Connecticut. (Council's Hearing Notice dated March 21, 2014)

11. The Council and its staff conducted an inspection of the proposed site on April 29, 2014, beginning at 2:00 p.m. During the field inspection, Cellco flew a four-foot diameter balloon at the site to simulate the height of the proposed tower. The weather was windy for most of the day and balloons were repeatedly blown into trees adjacent to the site. (Tr. 1, p. 26)

#### **State Agency Comment to Council**

12. Pursuant to C.G.S. § 16-50j (h), on March 21, 2014 and April 30, 2014, the following State agencies were solicited by the Council to submit written comments regarding the proposed facility: Department of Energy and Environmental Protection; Department of Public Health (DPH); Council on Environmental Quality; Public Utilities Regulatory Authority; Office of Policy and Management; Department of Economic and Community Development; Department of Agriculture; Department of Transportation (DOT); and Department of Emergency Services and Public Protection. (Record)
13. The DPH Drinking Water Section sent written comments to the Council on April 15, 2014 stating that the site does not appear to be in a public water supply source area. No other agencies responded to the Council's solicitation. (Record)

#### **Municipal Consultation**

14. Cellco sent a copy of the technical report to the Town of Trumbull on October 30, 2013. (Cellco 1a, Technical Report submittal)
15. On November 7, 2013, Cellco met with Trumbull's First Selectman, Timothy Herbst, to discuss the project. (Cellco 1, p. 19)
16. A copy of the technical report detailing the proposed project was submitted to the Town of Stratford on November 7, 2013. (Cellco 1, p. 19)

#### **Public Need for Service**

17. 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. 4)
18. 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. (Council Administrative Notice Item No. 4)
19. The Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services. (Council Administrative Notice Item No. 4)
20. The Telecommunications Act of 1996 prohibits any state or local entity from regulating telecommunications towers on the basis of the environmental effects, which include human health effects, of radio frequency emissions to the extent that such towers and equipment comply with Federal Communications Commission (FCC) 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. 4)

21. Pursuant to the tower sharing policy of the State of Connecticut under C.G.S. §16-50aa, if the Council finds that a request for shared use of a facility by a municipality or other person, firm, corporation or public agency is technically, legally, environmentally and economically feasible, and the Council finds that the request for shared use of a facility meets public safety concerns, the Council shall issue an order approving such shared use to avoid the unnecessary proliferation of towers in the state. (Conn. Gen. Stat. §16-50aa)

### **Public Safety**

22. The Wireless Communications and Public Safety Act of 1999 (911 Act) was enacted by Congress to promote and enhance public safety by making 9-1-1 the universal emergency assistance number, by furthering deployment of wireless 9-1-1 capabilities, and by encouraging construction and operation of seamless ubiquitous and reliable networks for wireless services. (Council Administrative Notice Item No. 6)
23. Following the enactment of the 911 Act, the FCC mandated wireless carriers to provide enhanced 911 services (E911) to allow public safety dispatchers to determine a wireless caller's geographical location within several hundred feet. (Council Administrative Notice Item No. 7)
24. Cellco will comply with the requirements of the 911 Act and E911 Act. (Cellco 1, p. 7)
25. Pursuant to the Warning, Alert and Response Network Act of 2006, the FCC has established a Personal Localized Alerting Network (PLAN) that requires wireless communication providers to issue text message alerts from federal bodies including the President of the United States. PLAN would allow the public to receive e-mails and text messages on mobile devices based on geographic location. The proposed facility would enable the public to receive e-mails and text messages. (Council Administrative Notice Item No. 5)
26. The proposed tower would be designed in accordance with the specifications of the American National Standards Institute EIA/TIA-222-F "Structural Standards for Steel Antenna Towers and Antenna Support Structures" and appropriate State Building Codes. (Cellco 1, Tab 1-p. 6; Cellco 3, response 6)
27. Physical site security would be provided by an an eight-foot high chain link fence as well as a rigid equipment shelter with a locked door and silent intrusion alarm. (Cellco 3, response 7)
28. The tower setback radius would be within the host property boundary. (Cellco 1, Tab 1-map C-1)

### **Existing and Proposed Wireless Coverage – Cellco**

29. Cellco proposes to install 700 MHz (Long Term Evolution - LTE) and 2100 MHz Advanced Wireless Services (AWS) services at the proposed site. The LTE and AWS systems would initially be used for data services. Cellco intends to deploy voice services on the LTE system by 2015. (Cellco 3, response 9)
30. Cellco designed this facility to meet a signal level threshold of -85 dBm for in-vehicle coverage and -75 dBm for in-building coverage. (Cellco 3, response 8)
31. The site would resolve capacity needs in the area, especially south towards the corporate park, Route 8 and the Merritt Parkway area. (Tr. 1, pp. 19, 25)

32. Cellco has three telecommunications facilities within two miles of the site, as follows:

<b>Site Location</b>	<b>Distance from Proposed Tower</b>	<b>Height of Antennas</b>	<b>Structure Type</b>
630 James Farm Rd., Stratford	1.2 miles east	98 feet	Tower
605 Huntington Street, Shelton	1.0 miles north	84 feet	Water tank
180 Hawley Lane, Trumbull	0.7 miles south	not reported	Rooftop

(Cellco 1, p. 3, Tab 8)

33. The proposed site would not replace any of the adjacent, existing sites. (Tr. 1, p. 21)

34. Cellco uses traffic mapping and models two-year capacity threshold limits to identify a capacity relief solution for any given site in its network before the site reaches full capacity. In this area, Cellco projects that all three adjacent sites will reach full capacity within a year: the capacity threshold limits for these sites were reached in 2012. The proposed tower is the identified relief solution. (Cellco 1, Tab 1 p. 5; Tr. 1, pp. 18-19, 29-33)

35. The proposed service area has seen a large increase in the use of LTE services in the past year. Cellco’s analysis indicates a large amount of wireless usage is centered on the Trumbull Corporate Park, where the site is proposed. (Tr. 1, pp. 30-31, 33-34)

36. The proposed site would provide service to portions of Route 8 and the surrounding commercial and residential areas in Trumbull and Stratford. The proposed site would provide reliable LTE wireless service to 5.75 square miles in this area. Approximately 7,631 people reside in this coverage area. Proposed AWS coverage would be 3.85 square miles with a population of 4,900 people (refer to Figures 2 & 3). (Cellco 1, p. 2; Cellco 3, response 10)

37. The Town’s 2014 Plan of Conservation and Development states the necessity of communications to meet community needs. Although the plan stated some areas of the Town lack coverage, the only specific area listed was the Town center. (Town of Trumbull 2014 Plan of Conservation and Development)

**Site Selection**

38. Cellco determined there were no existing towers or other sufficiently tall structures within the search area. (Cellco 1, Tab 8-p. 2)

39. Cellco examined six other properties within the Trumbull Corporate Park. None of the property owners was interested in leasing a site to Cellco. The properties include 25, 45, and 50 Commerce Drive, all owned by Consumer Products LLC, and 20 and 40 Merritt Boulevard, both owned by Conopco Inc., and 55 Merritt Boulevard, owned by Belman Corporation. (Cellco 1, Tab 8-p. 2)

**Facility Description**

40. The proposed facility would be located on a 14-acre parcel at 60 Commerce Drive in Trumbull, owned by the Pilot Corporation. The property is located within the Trumbull Corporate Park, immediately east of Route 8 and west of the Stratford –Trumbull town line (refer to Figure 4). (Cellco 1, p. 17, Tab 1)

41. The property contains two buildings and associated parking areas. A pond is located between the existing driveways and parking areas. A wooded area is located along the north side of the parcel at the top of a high bank. (Cellco 1, Tab 1-aerial map, maps C-1, C-2).
42. The property is zoned industrial. Zoning within a quarter-mile of the site is industrial and residential. (Cellco 1, p. 17, Tab 1-p. 4)
43. Land use within a quarter-mile of the site consists of residential to the east, Route 8 to the west and the Trumbull Corporate park to the north, south and west. (Cellco 1, Tab 1- site location map, p. 4)
44. There are 40 single-family residences within 1,000 feet of the tower site. (Cellco 1, p. 14)
45. The nearest residence to the tower site is approximately 390 feet to the east at 2945 Huntington Road, Trumbull. (Cellco 1, p. 14)
46. The nearest property line to the proposed site is approximately 190 feet to the north at 2945 Huntington Road, Trumbull. (Cellco 1, Tab 1-map C-1)
47. There are no schools or licensed day-care facilities within 250 feet of the proposed site. The nearest school is Bunnell High School in Stratford, 1.4 miles to the southwest. The nearest licensed daycare facility is located approximately 0.8 miles north of the site in Shelton. (Cellco 1, Tab 9-p. 6)
48. The tower site is located in a lawn area on the north side of the main building at a ground elevation of 170 feet above mean sea level. The building is approximately 22 to 26 feet in height where it abuts the tower site. (Cellco 1, Tab 1 maps; Tr. 1, p. 13)
49. Cellco would construct an 80-foot monopole at the site. The tower would be 46 inches at the base, tapering to 26 inches at the top (refer to Figure 5). (Cellco 1, Tab 1-p. 6)
50. Cellco would install its antennas on a platform at 80 feet above ground level. The tower would be designed to support an additional antenna platform at the 70-foot level. (Cellco 1, Tab 1-p. 6, map C-2)
51. Cellco would design the tower to support a 20-foot extension to accommodate additional telecommunication carriers. No other carriers have expressed interest in locating at this facility at this time. (Tr. 1, pp. 15-16, 71)
52. Cellco offered space on the tower for Town emergency service antennas but the Town has not yet responded to this offer. (Tr. 1, p. 16)
53. A 24-foot by 77-foot equipment compound would be constructed within a 24-foot by 82-foot lease area. The compound could accommodate one more carrier. Additional lease space would be required to expand the compound further. (Cellco 1, Tab 1-map C-2; Tr. 1, pp. 94-95)
54. Cellco would install a 12-foot by 30-foot equipment shelter within the compound. (Cellco 1, p. 12)
55. Access to the tower and associated compound would be from existing driveways and parking areas. A new 100-foot gravel driveway would be constructed off the existing northeast parking lot. (Cellco 1, Tab 1-p. 1)
56. Utility service to the compound would be installed underground from existing service on Commerce Drive. (Cellco 1, p. 2)

57. Site construction is anticipated to take approximately eight weeks. Once completed, radio frequency testing and integration would take another two weeks. (Cellco 1, p. 21)

58. Cellco's estimated construction cost of the facility is \$700,000, as follows:

Radio equipment	\$450,000.
Site development/installation	50,000.
Tower/antennas/shelter	180,000.
<u>Utilities</u>	<u>20,000.</u>
Total estimated cost	\$700,000.

(Cellco 1, p. 21)

### **Backup Power**

59. In response to two significant storm events in 2011, Governor Malloy formed a Two Storm Panel (Panel) that was charged with an objective review and evaluation of Connecticut's approach to the prevention, planning and mitigation of impacts associated with emergencies and natural disasters that can reasonably be anticipated to impact the state. In its review, the Panel found the following:

- a. "Wireless telecommunications service providers were not prepared to serve residential and business customers during a power outage. Certain companies had limited backup generator capacity;" and
- b. "The failure of a large portion of Connecticut's telecommunications system during the two storms is a life safety issue."

(Council Administrative Notice Item No. 37)

60. The Panel made the following recommendations:

- a. "State regulatory bodies should review telecommunications services currently in place to verify that the vendors have sufficient generator and backhaul capacity to meet the emergency needs of consumers and businesses;" and
- b. The Connecticut Siting Council should require continuity of service plans for any cellular tower to be erected. In addition, where possible, the Siting Council should issue clear and uniform standards for issues including, but not limited to, generators, battery backups, backhaul capacity, and response times for existing cellular towers."

(Council Administrative Notice Item No. 37)

61. In response to the findings and recommendations of the Panel, Public Act 12-148, An Act Enhancing Emergency Preparedness and Response, codified at C.G.S. §16-50II, required the Council, in consultation and coordination with the Department of Energy and Environmental Protection, the Department of Emergency Services and Public Protection and the Public Utilities Regulatory Authority (PURA), to study the feasibility of requiring backup power for telecommunications towers and antennas as the reliability of such telecommunications service is considered to be in the public interest and necessary for the public health and safety. The study was completed on January 24, 2013. (Council Administrative Notice Item No. 23)

62. The Council's study included consideration of the following matters:

- a. Federal, State and local jurisdictional issues of such backup power requirements, including, but not limited to, siting issues;
- b. Similar laws or initiatives in other states;
- c. The technical and legal feasibility of such backup power requirements;
- d. The environmental issues concerning such backup power; and

e. Any other issue concerning backup power that PURA deems relevant to such study.  
(Council Administrative Notice Item No. 23)

63. The Council reached the following conclusions in the study:

- a. "Sharing a backup source is feasible for CMRS providers, within certain limits. Going forward, the Council will explore this option in applications for new tower facilities;" and
- b. "The Council will continue to urge reassessment and implementation of new technologies to improve network operations overall, including improvements in backup power."

(Council Administrative Notice Item No. 23)

64. For backup power, Cellco would install a 50 kW diesel generator located within its equipment shelter. It could run for 4 days before refueling, assuming normal cell site operating conditions. (Cellco 3, response 4)

65. According to the Regulations of Connecticut State Agencies (RCSA) §22a-69-1.8, noise created as a result of, or relating to, an emergency, such as an emergency backup generator, are exempt from the State Noise Control Regulations. (R.C.S.A. §22a-69-1.8)

### **Environmental Considerations**

66. The proposed facility would have no effect upon historic properties. (Cellco 1, Tab 13)

67. No trees would be removed to develop the site. (Cellco 1, Tab 1-p. 4)

68. A retaining wall, up to seven feet in height, would be constructed along the north edge of the compound where the ground rises sharply by 18 to 20 feet to a wooded area. (Cellco 1, Tab 1 maps; Tr. 1, p. 13)

69. The retaining wall would have a drainpipe to relieve hydrostatic pressure behind the wall, allowing expected low-flow discharge to weep out into the gravel compound. (Tr. 1, pp. 52-53)

70. A swale would also be constructed along the west side of the retaining wall to capture and direct expected low-volume flows to the west following natural drainage patterns. The swale would be seeded or lined with stone. (Tr. 1, pp. 52-53)

71. The site is outside of the Federal Emergency Management Agency designated 500 year flood zone. (Cellco 1, p. 19)

72. The nearest wetland is approximately 180 feet west of the nearest edge of the proposed compound retaining wall. This wetland consists of a stream system at the edge of the parking lot. The stream enters a culvert that conveys the stream under the development to a detention pond on the south side of the property. (Cellco 1, p. 18, Tab 11-p. 1)

73. The proposed site is in proximity to known locations of the eastern box turtle, a State species of special concern. The turtle is a habitat generalist, using lawn areas as well as woodland as their home range. Cellco has developed a turtle protection program that would include silt fence barriers to keep turtles out of construction areas and sweeps of the construction work area. (Cellco 1, p. 15, Tab 11; Tr. 1, pp. 17-18)

74. Erosion and sedimentation controls consistent with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*, as amended, and other best management practices would be established and maintained during construction. (Cellco 1, p. 19)
75. Although the wooded northern portion of the host property is designated as the Merritt Industrial Park Greenbelt in certain mapping data layers such as the application coverage maps, no such title or restrictions were found in the subject land records for the parcel. (Cellco 1, Tab 6; Cellco 3, response 2)
76. Aircraft hazard obstruction marking or lighting of the tower would not be required. (Cellco 1, p. 20)
77. The proposed site is approximately two miles west of an estuarine intertidal marsh associated with Fowler Island, a designated Connecticut Critical Habitat located in Milford. The critical habitat designation recognizes rare and specialized wildlife habitats in the State. The critical habitat area consists of an estuarine intertidal marsh associated with Fowler Island. (Cellco 5)
78. The nearest Important Bird Area, a National Audubon Society designation that recognizes unique habitats that stand out from the surrounding landscape and typically support vulnerable or special concern species, is the Wheeler Marsh Wildlife Management Area, approximately four miles south of the proposed site in Milford. (Cellco 5)
79. The design of the proposed tower would comply with recommended guidelines of the United States Fish and Wildlife Service for minimizing the potential for telecommunications towers to impact bird species. The guidelines recommend that towers be less than 199 feet tall, avoid the use of aviation lighting, and avoid guy-wires as tower supports. (Cellco 1, Tab 10-p. 2; Cellco 5)
80. The emergency generator room in the shelter would have a floor designed to hold 125 percent of the tank capacity to ensure no fuel leaks out of the shelter in the event of fuel tank failure. (Tr. 1, pp. 54-56)
81. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of the proposed Cellco antennas (assuming LTE, AWS, PCS and cellular equipment) is calculated to be 98.3 percent of the standard for Maximum Permissible Exposure, as adopted by the FCC, at the base of the proposed facility. 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 facility and all channels would be operating simultaneously, which creates the highest possible power density levels. Under normal operation, the antennas would be oriented outward, directing radio frequency emissions away from the facility, thus resulting in significantly lower power density levels in areas around the base of the facility. (Cellco 1, p. 16)

#### **Visibility**

82. The proposed facility is located in an area characterized by rolling terrain and mature woodland that would limit views of the facility to select areas within 0.5 miles of the site. The average height of the tree canopy in the study area was determined to be 65 feet agl. (Cellco 1, Tab 9-pp. 5-6)
83. The tower would be visible year-round from approximately 61 acres within a half-mile of the site. Portions of the facility would be visible from an additional 144 acres when the leaves are off the trees. (Cellco 1, Tab 9-pp. 5-6)



84. The site is separated from residential areas to the north and east by mature stands of mostly deciduous trees. Some conifers are present to the east, providing additional screening of the site during leaf-off conditions. The tree canopy on the high ground immediately north of the site averages 90 feet. The wooded nature of the area screens the site from these residential areas. (Cellco 1, Tab 9-p. 6; Tr. 1, pp. 14-15)
85. Although there is a wooded buffer between the residential areas and the site, approximately eight abutting residential properties on Huntington Avenue and Twin Circle Drive would have year-round views of the facility through the trees. One additional residence on St. Johns Drive 0.4 mile west of the site would have a year-round view of the site through the trees. (Cellco 3, response 3; Tr. 1, pp. 21-24)
86. An additional 30 residences within a half-mile of the site may have views of the tower through the trees during leaf-off conditions. (Cellco 3, response 3)
87. The tower would not be visible from the Merritt Parkway, a designated National Scenic Byway, 0.6 miles south of the site. (Cellco 1, Tab 9-p. 6)
88. There are no formally designated hiking trail systems within two miles of the site. (Council Administrative Notice 50; Tr. 1, pp. 9-10)
89. Visibility of the proposed facility from specific locations within a two-mile radius of the site is as follows:

<b>Specific Location</b>	<b>Photo location on Map*</b>	<b>Approx. Portion of Facility Visible</b>	<b>Approx. Distance (miles)/ Direction to Tower</b>
Commerce Drive at entrance to property	1+	25 feet	0.1/northeast
Twin Circle Drive, adjacent to #16	2+	20 feet visible through trees	0.12/south
Twin Circle Drive, adjacent to #41	3	Spot view through trees	0.15/southeast
Twin Circle Drive, adjacent to #27	4	30 feet through trees	0.15/southeast
St. Johns Drive	5	15 feet through trees	0.38/northeast
Merritt Blvd.	6	10 feet above trees	0.21/northeast
Huntington Road, adjacent to #2771	7+	25 feet through trees	0.22/northwest
Huntington Road, adjacent to #2975	8+	30 feet through trees	0.09/southwest
Beaver Dam Road	9	not visible	0.43/southwest
Beaver Dam Road/Huntington Road	10	20 feet through trees	0.15/northwest
Host Property, rear parking lot	11	50 feet unobstructed	0.12/northwest

\*Map is attached as Figure 6.

+ Photo simulations of facility from these locations on the map are attached as Figures 7, 8, 9, 10. (Cellco 1, Tab 9)

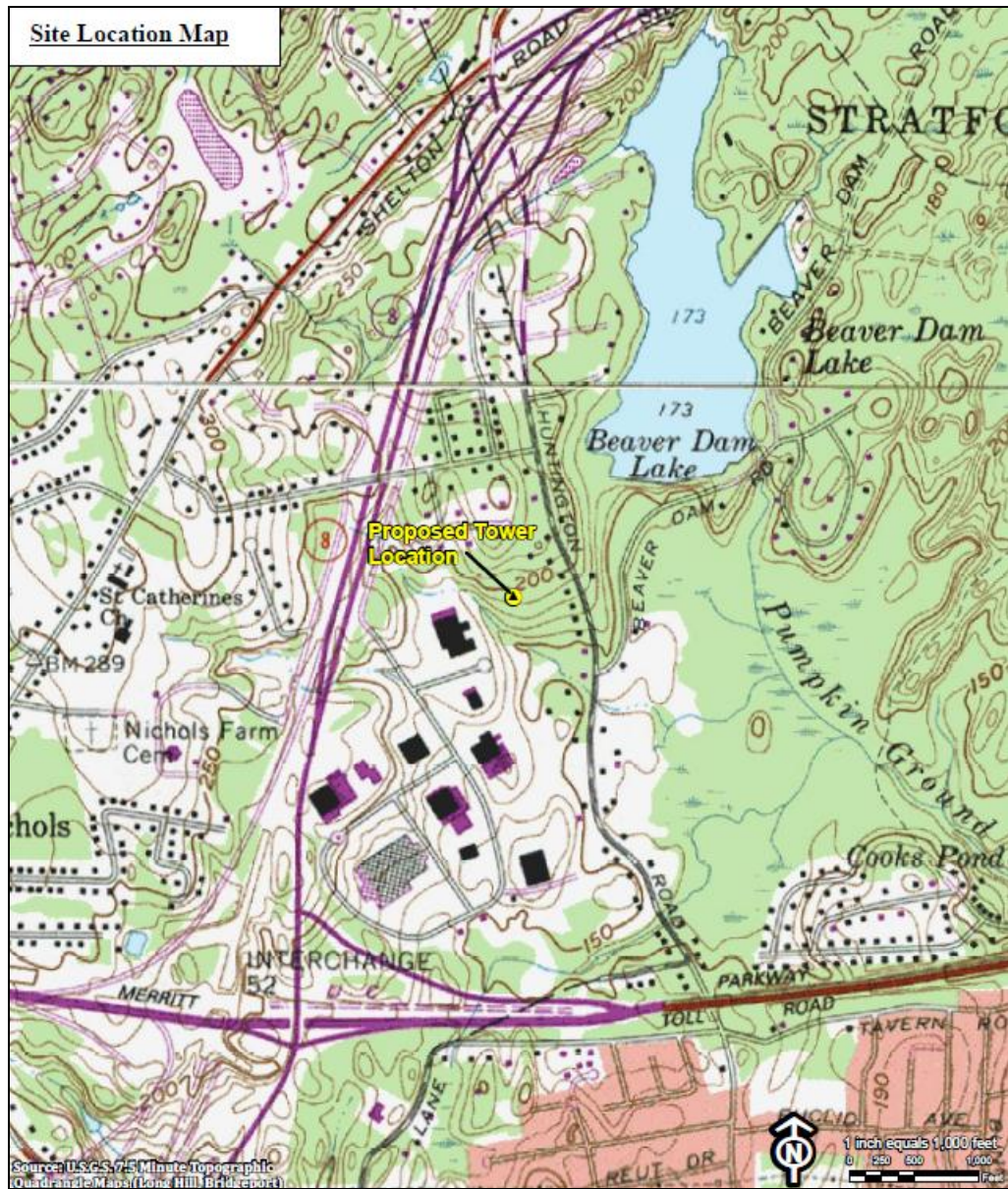


Figure 1: Site Location at 60 Commerce Drive. (Cellco 1, Tab 1)



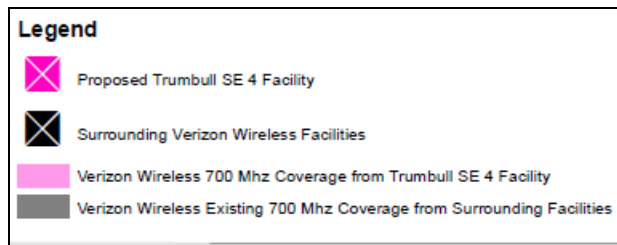
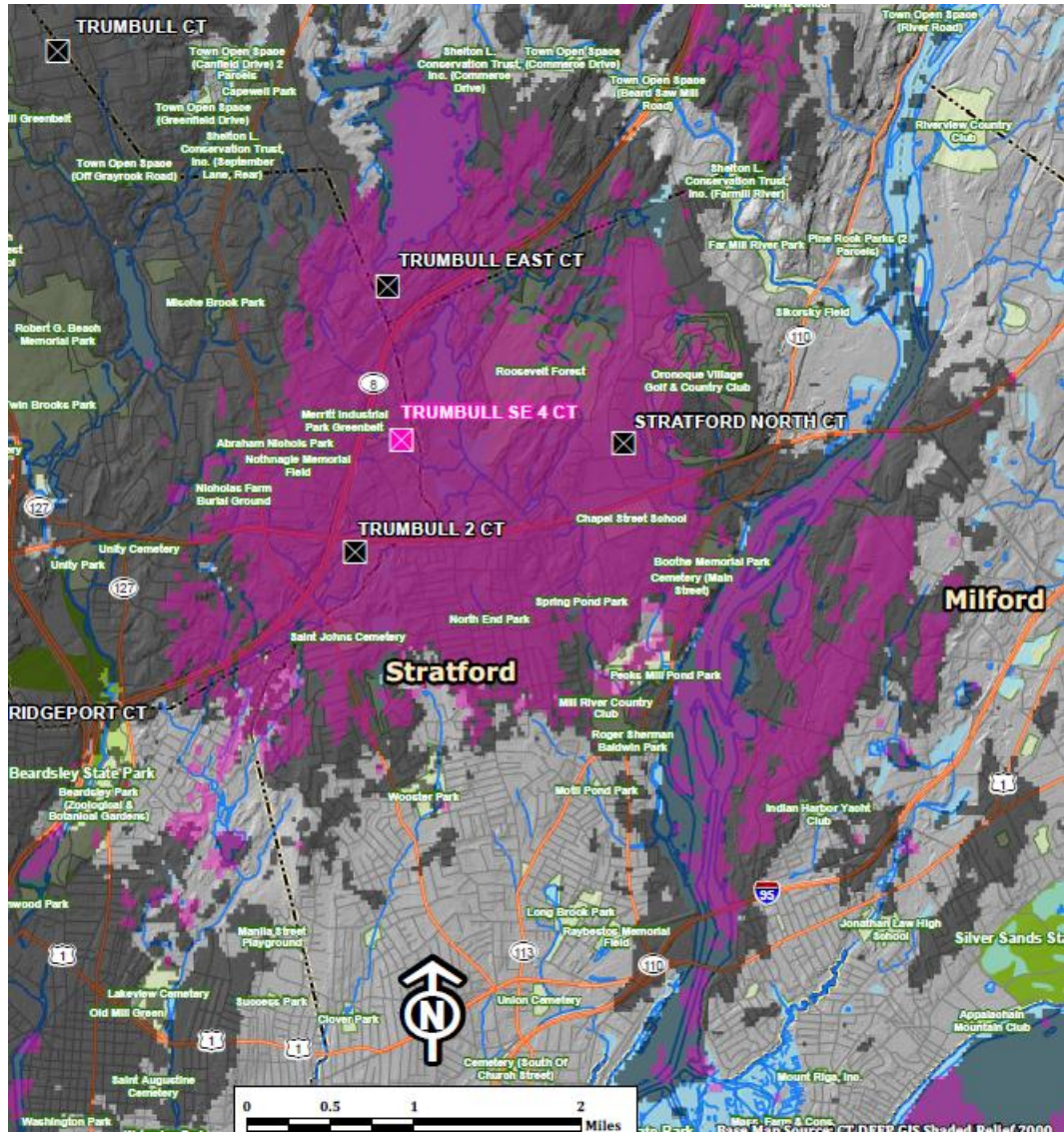


Figure 2: Existing and proposed 700 MHz coverage. Trumbull SE 4 CT, a Cellco designation, is the location of the proposed facility. (Cellco 1, Tab 6)

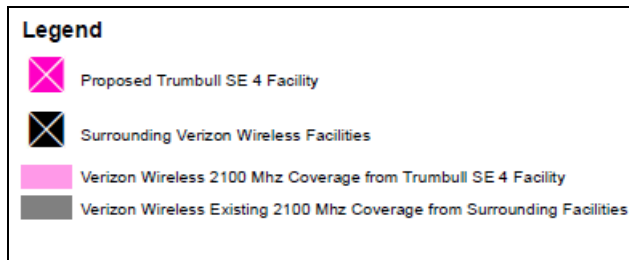
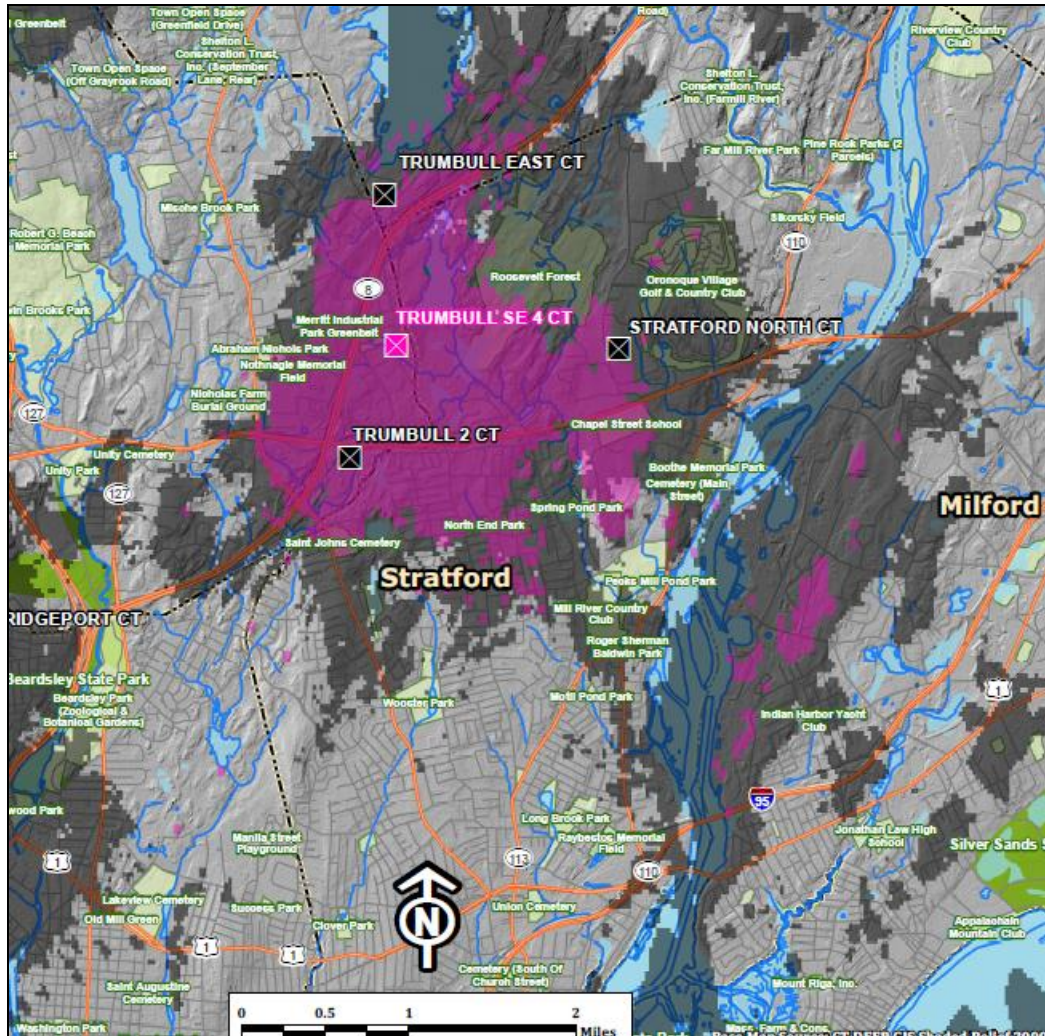


Figure 3: Existing and proposed 2100 MHz coverage. Trumbull SE 4 CT, a Cellco designation, is the location of the proposed facility. (Cellco 1, Tab 6)



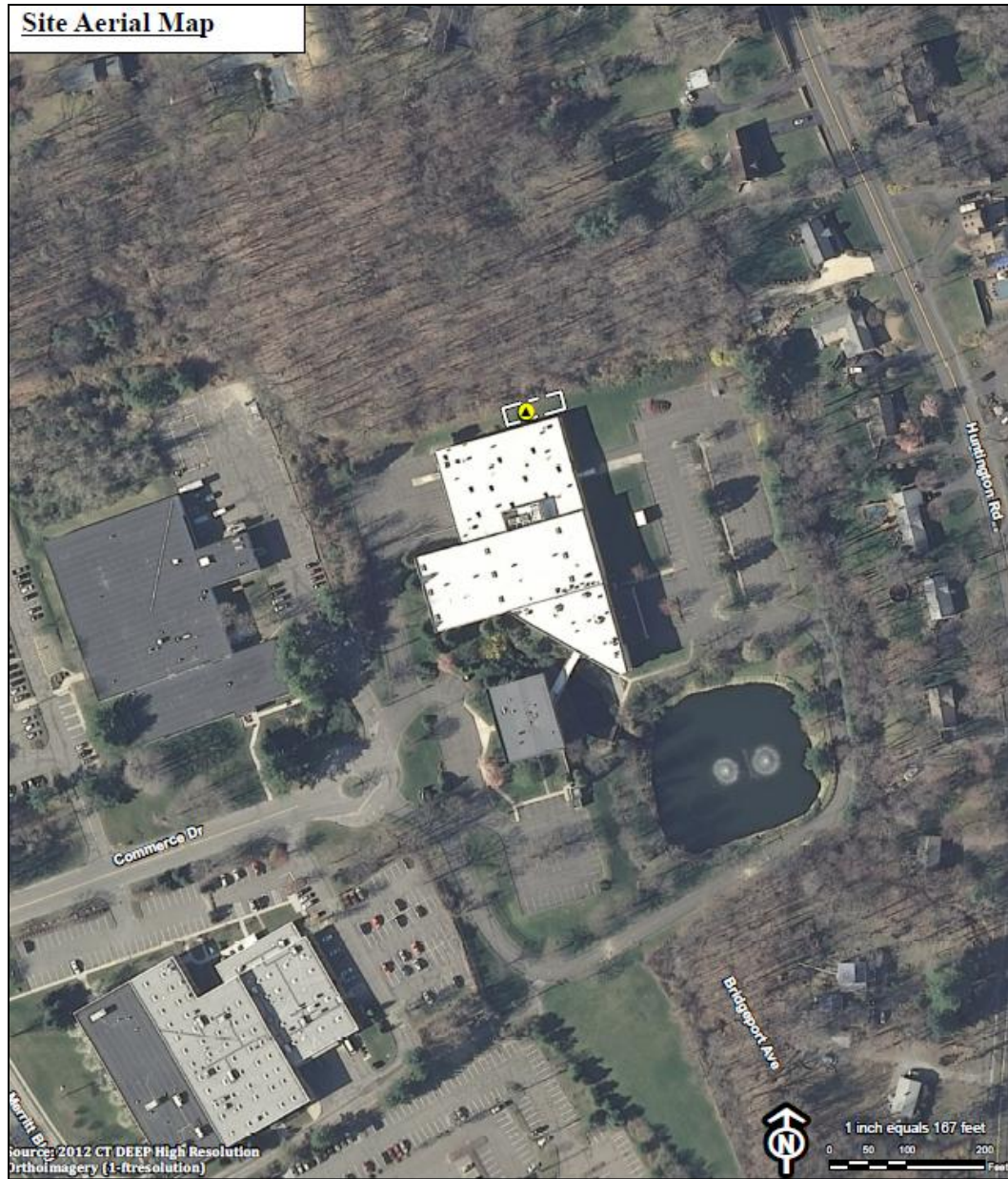


Figure 4: Site location (marked in yellow) adjacent to Pilot Corp. building in Trumbull Corporate Park. (Cellco 1, Tab 1)

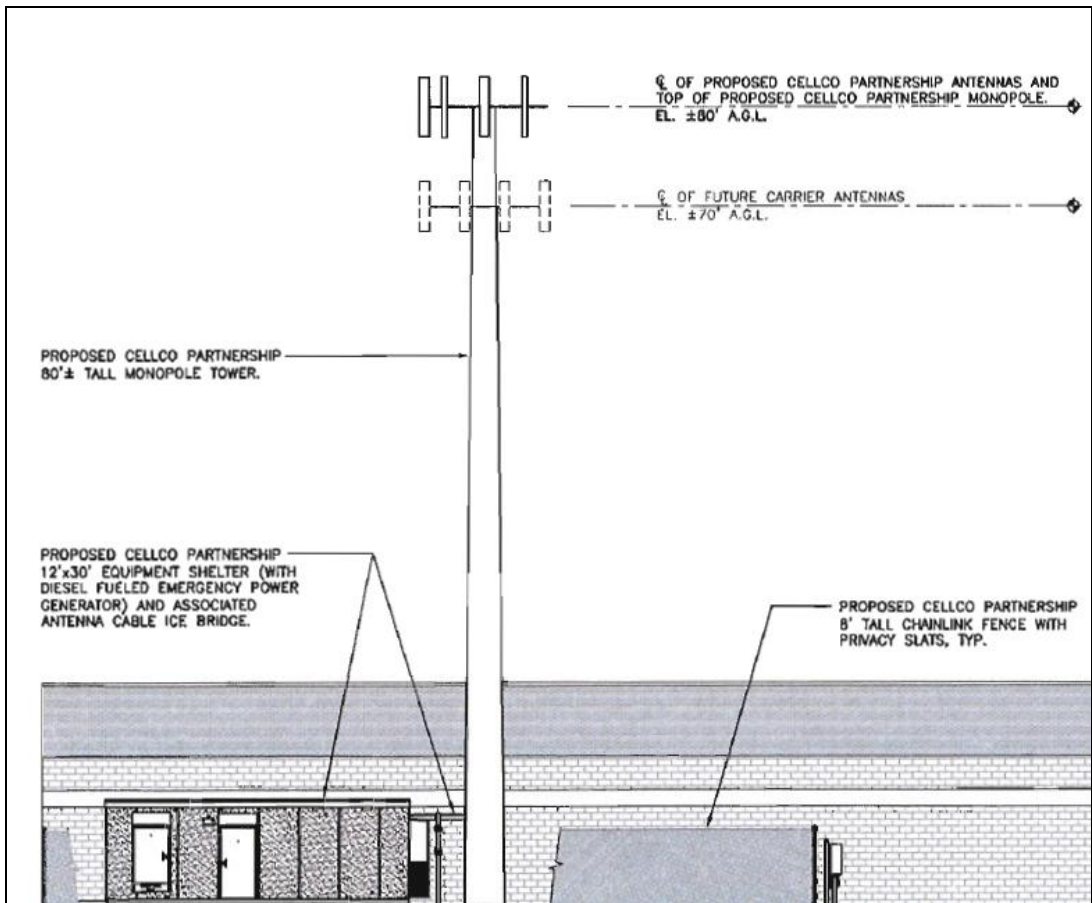
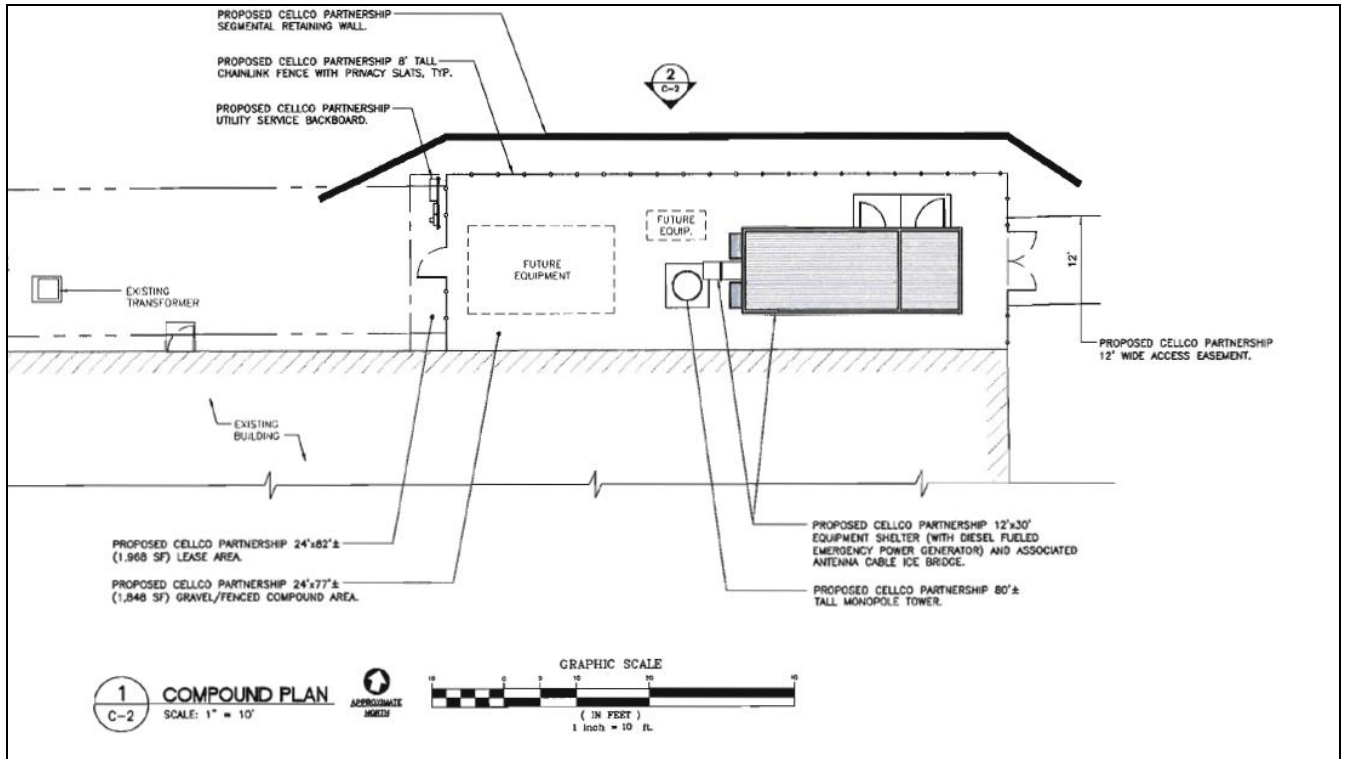


Figure 5: Schematic drawings of compound and tower. (Cellco 1, Tab 1)



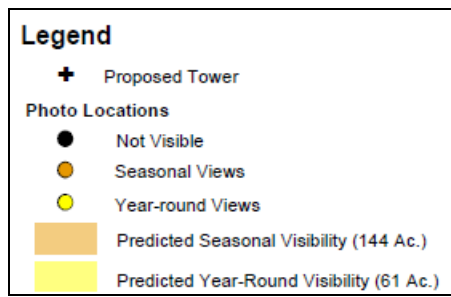
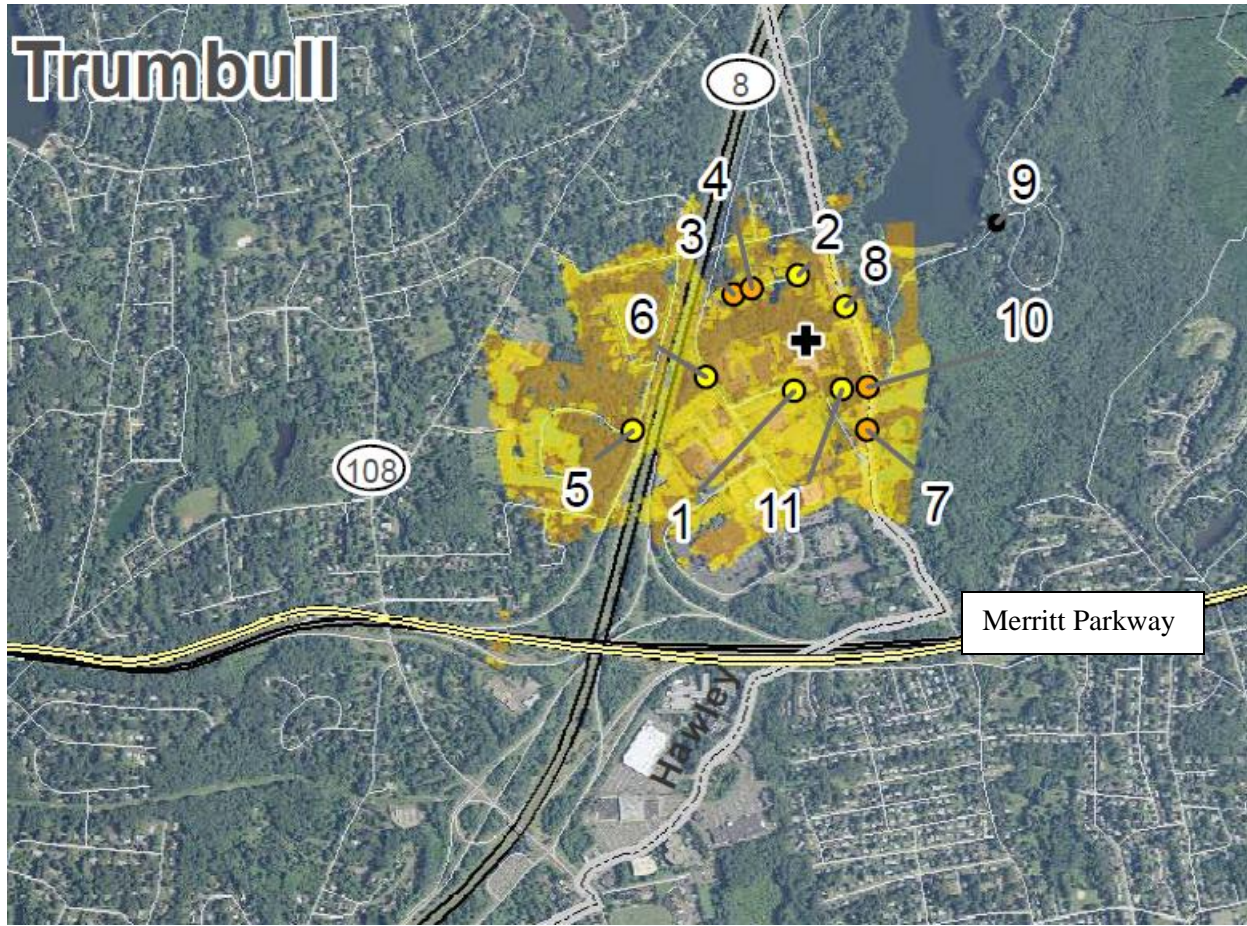


Figure 6: Projected visibility of the facility. Photosimulations from map locations 1, 2, 7, 8 are attached as Figures 7, 8, 9, 10.

(Cellco 1, Tab 9)





Figure7: Photostimulation from entrance to host property.



Figure 8: Photostimulation from Twin Circle Drive, adjacent to #16





Figure 9: Photosimulation from Huntington Road, adjacent to #2975.



Figure 10: Photosimulation from Huntington Road, adjacent to #2771.