Town of Mammoth Lakes

Planning & Economic Development Commission Staff Report

Meeting Date: February 14, 2024

AGENDA TITLE: Public hearing and consideration of Use Permit Application 23-002 for the construction of an 80-foot tall "stealth monopine" cell tower located at 1574 Old Mammoth Road, Mammoth Lakes Fire Protection District Station #2. The project is categorically exempt from CEQA pursuant to CEQA Guidelines §15303, New Construction or Conversion of Small Structures. **Continued from the November 8, 2023 meeting.**

Applicant: Eukon Group on behalf of AT&T

Property Owner: Mammoth Lakes Fire Protection District

REQUESTING DEPARTMENT:
Community & Economic Development
Noan Bobroff, Director
Michael Peterka, Associate Planner

OBJECTIVE:

1. Hear Staff and Applicant presentations
2. Hold Public Hearing
3. Planning & Economic Development Commission (PEDC) discussion
4. PEDC action to:
    a. Adopt the attached Planning and Economic Development Commission Resolution (the Resolution), making the required CEQA and Municipal Code findings approving Use Permit Application 23-002 with conditions as recommended by staff;
    b. Adopt the Resolution with modifications; or
    c. Deny the Resolution

SUMMARY:

Proposal:	The proposed project is an 80-foot tall "stealth monopine" cell tower located at 1574 Old Mammoth Road at Mammoth Lakes Fire Protection District Station #2. The parcel is within the Resort (R) Zoning District (Snowcreek Master Plan Area) and the project is subject to the Town's Telecommunication Facilities standards specified in the Municipal Code. The tower will be located in the back northeast corner of the property owned by the Mammoth Lakes Fire Protection District.
Project Name:	AT&T Cell Tower at Fire Station #2
Location:	1574 Old Mammoth Road (APN: 040-040-021-000)
Size of Property:	0.91 acres (39,640 sq. ft.)
Zoning:	Resort (R) – Snowcreek Master Plan
General Plan:	Resort (R)
Environmental Review:	Categorically Exempt (CEQA Guidelines Section 15303)

KEY ISSUES:

1. Does the proposed project meet the Use Permit criteria and required findings pursuant to Municipal Code (MC) Chapter 17.68 (Use Permits) and Section 17.52.280 (Telecommunication Facilities)?
2. Is the proposed project in compliance with the California Environmental Quality Act (CEQA)?

I. INTRODUCTION AND BACKGROUND

Previous PEDC Meeting

This item was originally scheduled for a public hearing at the November 8, 2023 PEDC meeting; however, due to an error in the public noticing that inadvertently resulted in a number of property owners not receiving the public hearing notice, the item was continued to a future PEDC meeting.

Project Summary

The proposed project is an 80-foot tall "stealth monopine" cell tower located at 1574 Old Mammoth Road on a 0.91-acre parcel in the Resort (R) zoning district that is also occupied by Mammoth Lakes Fire Protection District Station #2. The proposed cell tower is intended to improve cellular service in an area that currently has poor service and also improve emergency communications for the Fire District and other first responders. The tower will initially be used by AT&T and there will be the option for another service provider to collocate their equipment on the tower through approval of a subsequential use permit. A rendering of the proposed monopine can be seen in **Figure 1.** See **Attachment B-1** for the project plans.

The applicant's site selection process focused on the Old Mammoth area due to the significant gap in the acceptable level of cell service in that area of the community. Through a review of the existing AT&T network of towers, the applicant determined that modifications to those existing towers (e.g., increase in height, additional antennas) would not provide the necessary coverage for the area, and that the only solution to providing adequate coverage in the area was the installation of a new tower in the Old Mammoth area. The topography and development pattern (i.e., primarily residentially zoned) of the Old Mammoth area presents challenging to finding a suitable location for a tower and the applicant analyzed other potential sites in the area (i.e., those with suitable zoning or land uses). Along with the proposed cell tower location at 1574 Old Mammoth Road, two other sites in the vicinity were considered by the applicant. Per the 'Technical Siting Analysis' (see **Attachment B-5**) included in the application, the other sites considered were adjacent to the proposed site to the west and south and included the Snowcreek Athletic Club (51 Club Drive) and the St. Joseph's Catholic Church (58 Ranch Road). Those two sites were not further pursued or analyzed due to a lack of interest from the property owner (the athletic club owner was not previously interested in hosting a cell tower) or non-compatible zoning designation (the church site is zoned Residential Mult-Family 2 and telecommunication facilities are not a permitted use in that zone). The proposed location allows for the coverage objectives to be met (i.e., provide dependable connectivity for stationary and in-building coverage), as shown in the propagation maps included in **Attachment B-3.**

The tower height of 80 feet was determined to be the minimum height necessary to achieve the desired coverage objectives, whereas per the attached propagation maps in **Attachment B-3**, a tower height of 65 feet or 35 feet would decrease the coverage area, especially for in-building coverage. The proposed antennas will be located at 74 feet, but a total tower height of 80 feet is needed in order to create the cone shaped treetop that is intended to mimic a pine tree. Per the applicant, the proposed faux pine tree design is intended to be the least intrusive means of providing coverage in the area and that design was chosen to blend in with the surrounding pine trees on the site. The surrounding pine trees have an approximate average height of 55-65 feet.

Cellular antenna placement is regulated by the Telecommunications Act of 1996 (Act) along with local and state codes. The Act largely limits the Town's ability to regulate facilities in the following specified areas:

1. Local agencies are limited with respect to regulation of radio frequency (RF) emissions. Local agencies may not regulate the placement, construction, and modification of cellular wireless communication facilities on the basis of the environmental/health effects of radio frequency (RF) emissions, to the extent that such facilities comply with Federal Communications Commission (FCC) emission standards. In other words, local agencies may not deny approval (or otherwise regulate the placement, construction, or modification) of wireless communication facilities on the basis of RF emissions, provided the facility complies with FCC emission standards.

2. Local agencies may not unreasonably discriminate among providers of functionally equivalent services. Discrimination occurs when a provider of wireless communication facilities can show that it has been treated differently from other providers whose facilities are similarly situated in terms of structure, placement, and impacts.

3. Local agencies/regulation may not have the effect of prohibiting the provision of personal wireless service. A local agency "prohibits the provision of personal wireless service" when its decision results in a significant gap in a provider's service coverage. A significant gap is more than just a dead spot in an area otherwise covered. In order for a provider to show that a local agency's decision has resulted in a significant gap in personal wireless service, it must demonstrate that the manner in which it proposes to fill an identified gap (i.e., the proposal which it brought to the local agency) is the least intrusive on the values the denial sought to serve. In other words, if no alternatives for filling the gap exist that offer lesser impacts than the impacts associated with the proposal, then the denial has the effect of prohibiting the provision of personal wireless service.

4. A local agency's denial must be in writing and supported by substantial evidence in a written record. A decision by a local agency to deny a request to place, construct, or modify personal wireless service facilities must be in writing and must be supported by substantial evidence contained in a written record. There must be a written denial that is separate from the record, which contains a sufficient explanation of the reasons for the denial to allow a reviewing court to evaluate the evidence in the record supporting the decision maker's reasons. Substantial evidence includes such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.

As described in this report, staff finds the project consistent with the Town's General Plan and Municipal Code. Additionally, staff determined the project to be categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303, New Construction or Conversion of Small Structures.

Based on analysis, staff has determined that the required findings to support the requested approval can be made and recommends approval of the Use Permit with the conditions of approval noted in the attached resolution, **Attachment A**.

FIGURE 1: PUBLIC VIEW OF PROPOSED MONOPINE FROM OLD MAMMOTH ROAD
(ADDITIONAL VIEW RENDERINGS ARE INCLUDED IN ATTACHMENT B-2)

Existing Site and Surrounding Land Uses

The project is located at 1574 Old Mammoth Road, which is the location of Mammoth Lakes Fire Protection District Station #2. The 0.91-acre site is in the Resort (R) Zoning District (Snowcreek Master Plan Area). The surrounding land uses consist of Resort Zoned multi-family residential properties to the north, east, and west; Snowcreek Athletic Club to the west; and St. Joseph's Catholic Church and a single-family residence to the south. See **Figure 2** below for a map showing the site location and surrounding context. **Table 1** describes the surrounding land uses and zoning.

FIGURE 2: PROJECT SITE LOCATION MAP

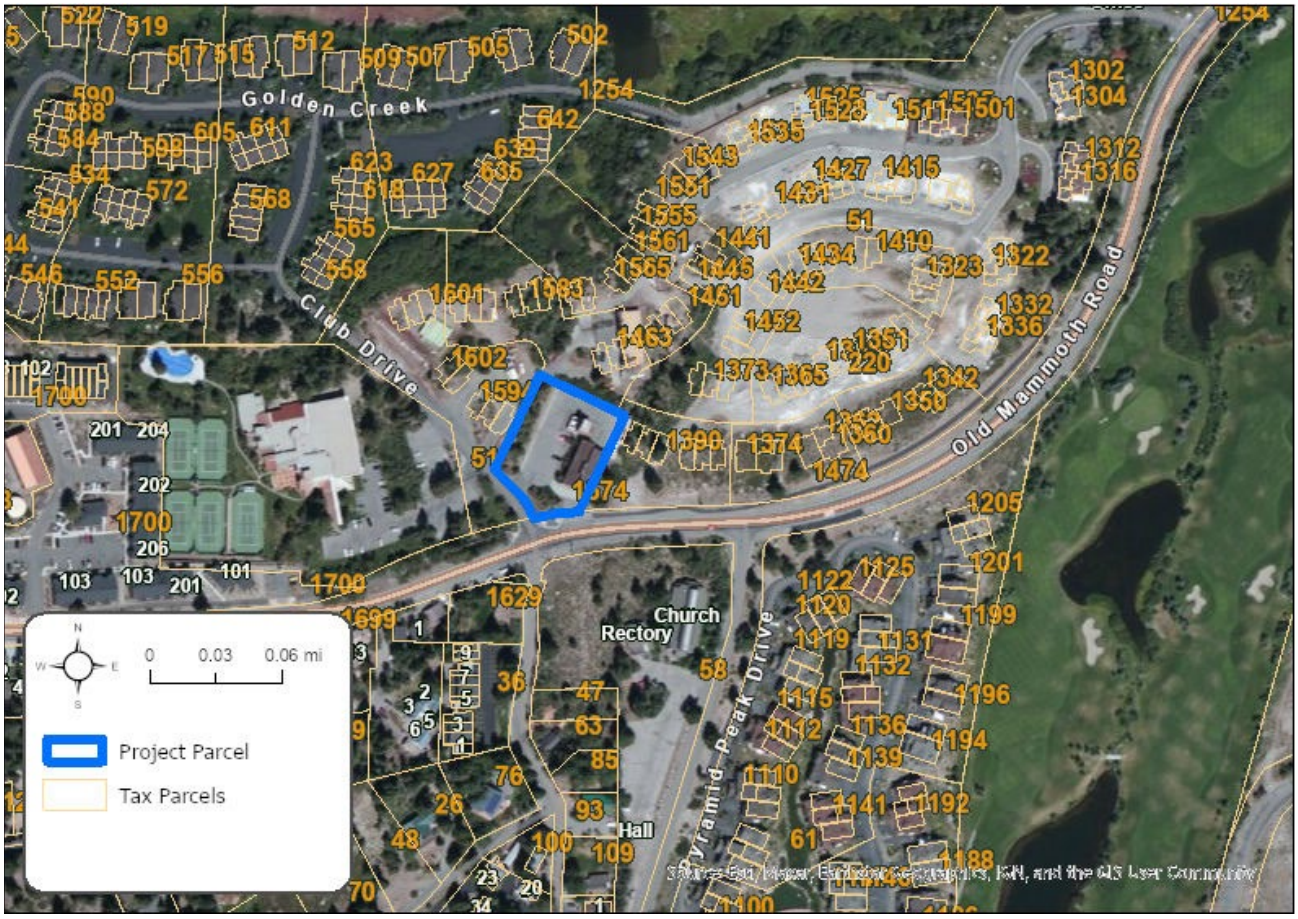

Table 1: Surrounding Land Uses and Zoning.

Location	Zoning*	Land Use	Special Considerations
North	R	Multi-family: 3-unit building	Snowceek VII
East	R	Multi-family: 3-unit building	Snowcreek VII
West	R	Multi-family: 3-unit building and Snowcreek Athletic Club	Snowcreek VII
South	RMF-2	Religious Institution and a Single-Family Residence	St. Joseph's Catholic Church

*R = Resort and RMF-2 = Residential Multi-Family 2

Site Zoning

The project site is zoned R (Resort) and is part of the Snowcreek Master Plan Area. The R zone classification allows for various types of land uses such as: residential, professional and administrative office uses, hotels, recreational facilities, public or quasi-public uses, or combinations of such uses. The R Zoning District lists utilities as a permitted use within the zoning district (Section 17.32.110(B)(4)) and the Master Plan includes an Infrastructure Plan addressing roads, public transportation, water, sewer, and other utilities within the Master Plan Area. The

Master Plan does not contain other detailed development standards for telecommunications facilities, and instead relies on the standards specified in the municipal code. Per Section 2.1.1 of the Master Plan, "where the Master Plan is silent on development standards or other regulations, other provisions of the Town's Municipal Code apply."

The proposed project is classified as a Telecommunication Facility use and the facility type is considered a Cellular Wireless Communications Facility. This use type is considered a Utility, which is a permitted use type in the R zone. A use permit is required for the proposed facility as a qualifying cellular wireless communications facility in a nonresidential zone per MC Table 17.52.280(C).

Development within the R zone is subject to the development standards found in the applicable master plan (i.e., Snowcreek Master Plan), with additional standards applying to cellular wireless communications facilities found in MC §17.52.280. The proposed project complies with all relevant development standards.

General Plan

The General Plan land use designation for the site is Resort.

II. ANALYSIS OF KEY ISSUES

KEY ISSUE #1: Does the proposed project meet the Use Permit criteria and required findings pursuant to Municipal Code (MC) Sections 17.68.050 and 17.52.280?

A Use Permit is required for cellular wireless communication facilities. Staff has determined that the required findings can be made for approval of a Use Permit pursuant to MC §17.68.050 (Use Permit Findings) and MC §17.52.280 (Telecommunication Facilities).

The proposed site layout and project design ensure that the cellular wireless communications facility is consistent with all applicable sections of the General Plan and Title 17 (Zoning Code). The proposed use and the conditions under which it will be operated and maintained will not be detrimental to public health and safety nor materially injurious to the properties or improvements in the vicinity.

Table 2: Zoning Consistency

General Information	
General Plan: Resort (R)	Specific Plan: N/A
Zoning: Resort (R)	Master Plan: Snowcreek Master Plan
Existing Land Use: Mammoth Lakes Fire Protection District Station #2	Permit(s) Required for Use: UPA

Development Standards			
Standard	**Required**	**Proposed**	**Complies?**
Setbacks[1]			
East side yard (feet)	20 feet	20 feet	Yes
North Rear yard (feet)	20 feet	20 feet	Yes

Cellular Wireless Communication Facilities (MC §17.52.280)	**Complies?**
Site Selection: Sites shall be selected based on the following order: (1) on or within an existing structure; (2) co-location facilities; (3) in locations where existing topography, vegetation, or other structure provide screening; or (4) on parcels that will not require significant visual mitigation.	Yes (see below)
Location: Facilities shall be located either within a structure, underground, in the rear portion of the property (not visible from the public right-of-way), or on a screened roof top area.	Yes (see below)
Location: Facilities shall not be located in a required parking, maneuvering, or vehicular or pedestrian circulation area.	Yes
Screening: If a new freestanding tower or monopole is necessary for the support of the antennas, it shall be located near existing utility poles, trees, or other similar objects, and consist of colors and materials that best blend with the background.	Yes (see below)
Height: Maximum height is not provided by the zoning code and is to be determined by the Use Permit.	Yes; Determined by the Use Permit

Height

MC Section 17.52.280 does not establish a maximum height for cellular wireless communications facilities, and instead specifies that the maximum height is to be determined by the use permit. Therefore, the maximum height of the proposed monopine cell tower is determined by the Use Permit and what is necessary to provide adequate coverage. The height of 80' was determined to be necessary to provide adequate coverage. The antennas are located at 74', but a total height of 80' is needed in order to create the cone shaped treetop that is aesthetically appropriate. The applicant provided analysis of different heights for the cell tower, which shows that the 80-foot tower is needed to provide the necessary coverage. The analysis is included in **Attachment B-3.**

Radio Frequency

As noted above in Section I above, the Telecommunications Act of 1996 prohibits local agencies from regulating the placement, construction, and modification of cellular wireless communication facilities on the basis of the

[1] The R zone does not establish setbacks for cellular facilities and the imposed setback standards were instead based off the Public and Quasi-Public (P-QP) zone since that is the zone that most closely matches the use on the site. Per Section 2.1.1 of the Master Plan, "where the Master Plan is silent on development standards or other regulations, other provisions of the Town's Municipal Code apply."

environmental/health effects of radio frequency (RF) emissions, to the extent that such facilities comply with Federal Communications Commission (FCC) emission standards. The FCC has established maximum permitted exposure (MPE) thresholds to radio frequency emissions, and if the analysis demonstrates that the MPE levels for general population areas are below those thresholds, then local agencies cannot consider those potential effects. For this site, it was determined that the MPE for any area surrounding the site at an above ground level (AGL) height of 35 feet (maximum height of adjacent multi-family structures) would be 15.94% of the FCC's allowable limit for General Population exposure. Additional information on the radio frequency analysis that was done for the project can be found in the *Radio Frequency Safety Survey Report Prediction* document, which is included in **Attachment B-4.**

Site Selection, Location, and Screening

As discussed in Section I above, the site selection process focused on the Old Mammoth area due to the significant gap in the acceptable level of cell service in that area of the community and the determination that a new tower in the Old Mammoth area was necessary to address this gap in service. When considering potential sites for a cell tower, MC Section 17.52.280(F)(2) specifies the following order of preference for the potential site.

a. On or within existing structures (e.g., church steeple, roof top stairwell or equipment enclosures, etc.);
b. Co-location facilities (i.e., locating equipment from more than one provider on a single facility);
c. In locations where existing topography, vegetation, or other structures provide the greatest amount of screening; or
d. On parcels which will not require significant visual mitigation.

For the Old Mammoth area, criteria (a) and (b) are not feasible since there are no existing structures that could accommodate a cell tower within the Old Mammoth area and there is not an existing cell tower in the area where a new facility could be co-located. Instead, the applicant worked to find a site and design a tower that adhered to criteria (c) and (d). The proposed location on the site is in the rear of the property screened from the public right-of-way to the maximum extent possible and will rely on the faux pine tree design to be the least intrusive for the area. That design was chosen to blend in with the surrounding pine trees on the site, which have an approximate average height of 55-65 feet.

General Plan Consistency:

The project is consistent with the following General Plan Vision Statements as described in **Table 3**:

Table 3: General Plan Vision Statement Conformance

General Plan Vision Statement	Explanation of Project Conformance
"*being a great place to live and work*"	The project will improve cell reception in an area of Town that is currently lacking, which will improve livability and safety in Old Mammoth.

The project is consistent with the following General Plan goals, policies, and actions as described in **Table 4**:

Table 4: General Plan Conformance with Goals, Policies, and Actions

Goal, Policy, or Action	Explanation of Project Conformance with Goal, Policy, or Action
E.3.H: Encourage expansion of a progressive telecommunication and internet communication infrastructure in the community.	The project will expand and improve telecommunication infrastructure by expanding service in an area that has insufficient service.
S.10.C: Coordinate with California Public Utilities Commission , telecommunication, and internet service providers to improve resilience and redundancy of telecommunication and broadband infrastructure.	Through coordination with telecommunication service providers, service will be enhanced, which will allow for emergency use by the Mammoth Lakes Fire Protection District and other first responders.

KEY ISSUE #2: Is the proposed project consistent with the California Environmental Quality Act (CEQA)?

Staff has determined that the Project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303 (New Construction or Conversion of Small Structures) of Title 14 of the California Code of Regulations. CEQA Guidelines Section 15303 applies to projects that consist of the installation of small new equipment and facilities in small structures, which the State has determined to be a class of projects that will not have a significant effect on the environment. CEQA Guidelines Section 15303 applies to projects that consist of (1) a limited number of new, small facilities or structures; and (2) the installation of small new equipment and facilities in small structures, both of which the State has determined to be a class of projects that will not have a significant effect on the environment. For non-residential uses, this exemption is generally limited to structures that do not exceed 2500 square feet in floor area. The project involves the construction of a new 80-foot tall "stealth monopine" cell tower located in the rear northeast corner of the Old Mammoth Road Fire Station site at 1574 Old Mammoth Road. The proposed tower and associated equipment enclosures are structures that do not involve significant amounts of hazardous substances and do not exceed a combined 2,500 square feet in floor area, as the project only includes approximately 640 square feet of floor area (cell tower and lease area combined). Additionally, none of the exceptions set forth in CEQA Guidelines Section 15300.2, which would preclude a project from using a categorical exemption, are applicable, as described below:

a. The project is not located in a sensitive environment. The project parcel is located on a fully developed and previously disturbed site that contains existing buildings and paving. Furthermore, the site is not located in an area that would be considered environmentally sensitive, as the site and surrounding parcels are fully developed.

   There are no designated scenic highways adjacent to or near the project site. There are no designated farmland areas within the Town boundaries, thus the site is not identified as farmland by the California Resources Agency as part of the Farmland Mapping and Monitoring Program, is not located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and is not subject to any Williamson Act Contracts. Furthermore, no portion of the site is zoned for or developed as forest land or timberland as defined in Public Resources Code §12220(g) and Government Code §4526. There are no known sensitive biological resources in the project vicinity, and the project site is not located within the boundaries of a Habitat Conservation Plan or Natural Community Conservation Plan. The project site is currently developed as a public safety use. No classified or designated mineral deposits of statewide or regional significance are known to occur on the project site. The site is not located within a very high fire hazard severity zone, is not located within a state-designated Alquist-Priolo Fault Hazard Zone, does not

have any known active faults crossing the site, and the nearest fault to the project site is approximately 1.5 miles to the northwest. There are no hazardous material sites listed within or near the project site per any of the State and Federal databases. There are no known historical or cultural resources on the site.

b. The cumulative impact from successive projects of the same type in the same place over time will not be significant because at this time, there are no applications or proposals submitted to the Town for additional cell towers to be constructed on the site, and the nearest existing tower is located approximately one mile away.

c. Given the location, scope, and purpose of the proposed project, there would be no significant impacts or effects on environmental resources during construction of operation, as the site has been previously developed. It is not anticipated that any unusual circumstances exist on the site that would result in significant impacts or increase the severity of any existing less than significant impacts.

d. As stated above in response (a), the project site is not located adjacent to or near a scenic highway. The project location is not identified as a Major View Corridor in the Town's General Plan and views of the project site are not considered scenic. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista or damage scenic resources within a state scenic highway.

e. As stated above in response (a), there are no hazardous materials listed within or near the project site. The project site is not listed on the Hazardous Waste and Substances list maintained by the Town; or the State Water Resources Control Board GeoTracker system which includes leaking underground fuel tank sites and spills, leaks, investigations, and cleanup sites; or the Department of Toxic Substances Control EnviroStar Data Management System which includes CORTESTE sites; or the Environmental Protection Agency's database of regulated facilities.

f. As stated above in response (a), there are no known historical or cultural resources areas on the site, and therefore, there will not be a substantial adverse change in the significance of an established historical resource as a result of the project.

Therefore, the project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(2) since the project meets the criteria for use of the 'New Construction or Conversion of Small Structures' categorical exemption and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2.

Public Comments and Outreach

A notice of the public hearing including a project description was sent to property owners within 400 feet of the subject property[2; 3]. A total of 376 property owners were notified. A Public Notice was also published in *The Sheet* on February 3rd and February 10th. A copy of the notice is included as **Attachment C.**

Staff has received a number of written comments on this project as well as in person comments during the November 8 PEDC meeting. Public comments received prior to publishing the staff report are included in **Attachment D**, and any additional public comments received will be distributed to the Commission separately. The comments have been reviewed and grouped into general categories as described below.

[2] Public notices are normally sent to properties within a 300-foot radius of the project site; however, the radius of notified properties was increased to 400 feet to inform a greater number of surrounding property owners.

[3] An error in the public notice property selection for the November 8, 2023 PEDC meeting resulted in a continuance of the item to a future PEDC meeting.

- ***Comments were received expressing concerns of visual impacts.***

  The project meets the standards found in Zoning Code Section 17.52.280 (Telecommunication Facilities). These include locating the facility in the rear of the property (not visible from public right-of-way) and screening (i.e., faux pine tree design) to blend the structure into the surroundings. The proposed faux pine tree design is intended to be the least intrusive means of providing coverage in the area and that design was chosen to blend in with the surrounding pine trees on the site. The surrounding pine trees have an approximate average height of 55-65 feet.

- ***Comments were received expressing concerns of health and safety related radio frequency emissions.***

  As stated previously in this report, pursuant to the Telecommunications Act of 1996, the Town is not able to consider the environmental effects of radio frequency, including health, when regulating the placement of a cell tower provided that the FCC Guidelines for maximum permitted exposure (MPE) to radio frequency emissions are adhered to. For this site, it was determined that the MPE for any area surrounding the site at an above ground level (AGL) height of 35 feet (maximum height of adjacent multi-family structures) would be 15.94% of the FCC's allowable limit for General Population exposure. Additional information on the radio frequency analysis that was done for the project can be found in the *Radio Frequency Safety Survey Report Prediction* document, which is included in **Attachment B-4.**

- ***Comments were received that other locations should be considered.***

  AT&T and their consultant, Eukon Group, performed a thorough site analysis and determined Fire Station #2 to be the best site for the monopine cell tower. Other sites that were considered include St. Joseph's Catholic Church located at 58 Ranch Road and the Snowcreek Athletic Club located at 51 Club Drive. The church site is not a viable location because it is zoned Residential Multi-Family 2, and telecommunication facilities are not permitted in residential zones. The Snowcreek Athletic Club was not pursued due to lack of landlord interest at the time AT&T was conducting their alternative site analysis. See **Attachment B-5** for additional information on the technical siting analysis.

- ***Comments were received that the proposed telecommunication facility will impact airplanes and the Mammoth Airport.***

  In the "Technical Siting Analysis" prepared by AT&T and the Eukon group, AT&T acknowledges that the facility will operate in full compliance with the regulations and licensing requirements of the Federal Aviation Administration (FAA).

- ***Comments were received that the photo-simulations prepared by the applicant are inaccurate and do not accurately portray the proposed telecommunication facility.***

  A statement confirming the accuracy of the photo-simulations is included in **Attachment B-2**. The statement is from the independent contractor that was tasked with producing the photo-simulations on behalf of Eukon Group.

Separately from the public noticing, the Mammoth Lakes Fire Protection District discussed the project at their June 27, 2023 Board of Commissioners meeting. The Fire District made an announcement at the June 7, 2023 Town Council meeting during public comment regarding the upcoming Board meeting on the proposed cell tower project at Fire Station 2. At the meeting, three members of the public were in attendance to ask questions about the project.

Additional outreach was done between the November 8, 2023 PEDC meeting and the February 14, 2024 meeting with the neighboring Creekhouse HOA (Snowcreek VII) to review the proposed project and consider alternatives. At the request of the HOA group, Eukon Group had additional photo-simulations prepared that show the proposed

tower from within the Creekhouse development looking to the southeast. Ultimately, no resolution on alternative sites was achieved through the outreach, and the Town proceeded with the rescheduled public hearing in accordance with the "shot-clock" tolling agreement executed between the Town and the applicant (see **Attachment E**)

III. STAFF FINDINGS AND RECOMMENDATION

Staff finds that the project meets the applicable requirements and recommends that the Planning and Economic Development Commission adopt the attached Planning and Economic Development Commission Resolution, making the required CEQA and Municipal Code findings approving Use Permit Application 23-002 with conditions as recommended by staff or with modifications.

Attachments

Attachment A: Planning and Economic Development Commission Resolution

Attachment B-1: Project Plans

Attachment B-2: Photo-Simulations

Attachment B-3: Site Justification Maps

Attachment B-4: RF Safety Report

Attachment B-5: Technical Siting Analysis

Attachment D: Public Comments

Attachment E: Tolling Agreement