



MURPHY
SULLIVAN
KRONK

August 26, 2015

Via electronic mail and U.S. Mail

Aaron Adler, Chair
Town of Brookfield Planning Commission
P.O. Box 463
Brookfield, Vermont 05036

Re: Application for a Certificate of Public Good, pursuant to 30 V.S.A. § 248a
(LIMITED SIZE AND SCOPE)
Applicant: Vermont RSA Limited Partnership and Cellco Partnership, each d/b/a
Verizon Wireless ("Verizon Wireless")
Project: Modifications to an Existing Wireless Telecommunications Facility
Location: 2382 Ridge Road, Brookfield, VT
Landowner: Douglas & Diane Haggett
Tower Owner: American Tower Corp. ("ATC")

Dear Aaron:

I write on behalf of Verizon Wireless in response to your August 12, 2015 letter submitted on behalf of the Brookfield Planning Commission ("PC"). Among other things, that letter discusses the 45-day Notice ("Notice") submitted by Verizon Wireless in the above-referenced matter, through a letter dated July 21, 2015 and its enclosures.

The PC contends that the Notice did not satisfy the Public Service Board's requirements under 30 V.S.A. § 248a and the *Second Amended Order implementing standards and procedures for issuance of a certificate of public good for communications facilities pursuant to 30 V.S.A. § 248a* (Order entered Sept. 5, 2014)¹. Verizon Wireless disagrees with this contention. Therefore, it will not be submitting a new Notice, or a supplemental Notice or agreeing to toll or re-commence the notice period.

Representatives of Verizon Wireless will attend the public meeting with the PC and, the Brookfield Selectboard scheduled for Thursday, September 3, 2015 at 7 p.m. at the Town Office. In doing so, Verizon Wireless is reserving all of its rights, and participation should not be construed as any form of waiver.

Your letter continues with a description of materials that AT&T provided and requests that Verizon Wireless provide the same type of information for the above-referenced site

¹ The Board's Third Amended Order, entered on August 19, 2015, is identical to its predecessor in all regards relevant to the Notice.

("Collocation") and the proposed "raw land" tower on West Street, described in our April 1, 2015 Notice ("New Tower").

Along those lines, and consistent with the requirements of 30 V.S.A. § 248a, as framed by Section 704 of the Federal Telecommunications Act of 1996 ("TCA"; codified at 47 U.S.C. § 332(c)(7)) and Section 6409 of the Middle Class Tax Relief and Job Creation Act of 2012 ("Section 6409"; codified at 47 U.S.C. § 1455(a)), Verizon Wireless submits one physical and one electronic copy of the following:

- Propagation plots showing existing and proposed coverage for both the Collocation and the New Tower;
- Photographic Simulations, showing existing and proposed conditions for both the Collocation and the New Tower;
- The following analysis of the Brookfield Town Plan, as it applies to each project as constrained by the relevant authorities cited above:

The Collocation:

The Brookfield Town Plan, amended as of January 24, 2011 (the "Town Plan"), purports to incorporate sections of the Brookfield Development Bylaw as follows: "For the purposes of Section 248a proceedings before the PSB the height and other dimensional and decommission requirements of the telecommunications by-law." *Id.* at 11.

This attempt to accomplish, by indirection, what the PSB has previously ruled cannot be done directly will fail. Further, an application of the Town Plan's dimensional requirements would violate both Section 6409 and the TCA.

Section 6409:

Section 6409 states:

Notwithstanding section 704 of the Telecommunications Act of 1996 (Public Law 104–104) or any other provision of law, **a State or local government may not deny, and shall approve**, any eligible facilities request for a modification of an existing wireless tower or base station that does not substantially change the physical dimensions of such tower or base station.

47 U.S.C. § 1455(a)(1)(emphasis added). That statute defines "eligible facilities" as:

any request for modification of an existing wireless tower or base station that involves:

- A. collocation of new transmission equipment;

B. removal of transmission equipment; or

C. replacement of transmission equipment.

Id.

Verizon Wireless has proposed to collocate new transmission equipment. Therefore, it is proposing an “eligible facility”.

The Federal Communications Commission has ordered that the relevant State or local regulatory body employ the following “substantial change” analysis:

After careful review of the record, the Commission adopts an objective standard for determining when a proposed modification will “substantially change the physical dimensions” of an existing tower or base station. The Commission provides that a modification substantially changes the physical dimensions of a tower or base station if it meets any of the following criteria: (1) **for towers outside of public rights-of-way, it increases the height of the tower by more than 10%, or by the height of one additional antenna array with separation from the nearest existing antenna not to exceed twenty feet, whichever is greater.**

Federal Communications Commission Infrastructure Report and Order, Adopted October 17, 2014 at 192 (emphasis added). (Electronic copy of document available in PDF and Word format at: <https://www.fcc.gov/document/wireless-infrastructure-report-and-order>).

In the case of the Collocation, Verizon Wireless seeks to extend the height of the tower, outside of the public right of way, by the height of one antenna array with separation from the centerline of the nearest existing antenna of fourteen feet. Thus, Verizon Wireless’ application for the Collocation is for an eligible facility and does not constitute a substantial change. Therefore, a State or local government may not deny and must approve it.

The TCA

Further, in PSB Docket No. 8126, the PC contended that the modifications proposed by AT&T (specifically the 10-foot tower extension) would conflict with the section of the Town Plan that purports to limit the height of all communications towers to no more than ten feet above the surrounding tree line. However, in that same Docket, the PC and then the PSB determined that the proposed changes would be in the general good of the State, and a Certificate of Public Good (“CPG”) was issued on that basis. See PC Memorandum of July 12, 2013 (“PC Memo”) attached.

The same reasoning that supported that decision also supports the issuance of a CPG for the modifications proposed by Verizon Wireless in this project. For example, as the PC observed in Docket No. 8126, that:

[I]n deciding whether to approve the proposed changes under 30 V.S.A. § 248a, the PSB will consider the general good of the state, balancing the impacts and costs of the changes with their benefits, including whether the changes support universal availability of infrastructure for transmitting voice and high-speed data, availability of wireless telecommunications services along the state's travel corridors and in its communities, and competitive choice for consumers among telecommunications providers. 30 V.S.A. §§ 202c(b), 248a(a).

PC Memo at 2.

Verizon Wireless' proposed modifications at this existing site will support universal availability of voice and high-speed data, both within travel corridors and the in the community and will enhance the competitive choices for consumers among telecommunications providers. As with AT&T's modifications, Verizon Wireless will co-locate its antennas on an existing communications tower with a ten foot extension.

In light of the PC's acquiescence to AT&T's nearly identical modifications, if the PC were to persuade the PSB to deny Verizon Wireless' application for the Collocation, such denial would constitute unreasonable discrimination among providers of functionally equivalent services, as proscribed by the TCA. See U.S.C. § 332(c)(7)(B)(i)(I).

The New Tower:

The Town Plan recognizes the need for telecommunications infrastructure and encourages such development in a manner that preserves the aesthetics and scenic beauty of the Town and protects the scenic qualities of the town's ridgetops.

The Town Plan also places great value on conservation of wetlands and wildlife habitat. Verizon Wireless engaged the services of a wetlands expert who evaluated the site chosen for this facility and found no wetlands within the project area.

Deer habitat has been identified in the vicinity of the proposed telecommunications facility. In an effort to address potential issues, Verizon Wireless has reached a general agreement with the Department of Fish and Wildlife regarding preservation/conservation of deer wintering areas. This agreement calls for avoiding softwood stands wherever possible and limits the time of year when construction will occur.

Parties on attached Service List

August 26, 2015

Page 5 of 6

The Town Plan purports to incorporate sections of the Brookfield Development Bylaw as follows: "For the purposes of Section 248a proceedings before the PSB the height and other dimensional and decommission requirements of the telecommunications by-law." *Id.* at 11.

As stated above, this attempt to accomplish, by indirection, what the PSB has previously ruled cannot be done directly will fail. Further, a literal application of those requirements, especially the ten-foot above the treeline height limit, would effectively prohibit the provision of wireless telecommunications services in violation of the Telecommunications Act of 1996. 47 U.S.C. § 332(c)(7)(B)(i)(II).

It is self-evident that the New Tower is more than ten feet above the surrounding tree line. However, as demonstrated above, that Town Plan provision that purports to limit tower height in that manner is not enforceable and application of it by a regulatory body would violate federal law.

We look forward to seeing you on September 3.

Very truly yours,



Brian J. Sullivan, Esq.

BSullivan@mskvt.com

Enclosures

c: Parties on attached Service List

SERVICE LIST

Susan Hudson, Clerk
Vermont Public Service Board
112 State Street, 4th Floor
Montpelier, VT 05620-2701

John Benson, Chair
Brookfield Selectboard
P. O. Box 463
Brookfield, VT 05036

Peter G. Gregory, Executive Director
Two Rivers-Ottawaquechee Reg'l Commission
128 King Farm Road
Woodstock, VT 05091


Geoff Commons, Dir. for Public Advocacy
c/o Dan Burke, Esq.
Vermont Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

Chris Recchia, Commissioner
Vermont Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

Heather Douglas Wilkins
Territory Manager-Business Development
Northeast (New England/NY)
American Tower Corporation
10 Presidential Way
Woburn, MA 01801

**TOWN OF BROOKFIELD PLANNING COMMISSION
P.O. BOX 463
BROOKFIELD, VT 05036**

MEMORANDUM

FROM: Town of Brookfield Planning Commission 
DATE: July 12, 2013
RE: AT&T Mobility; Wireless Communications Facility; 2382 Ridge Road,
Brookfield VT; Recommendations of the Planning Commission

Pursuant to 30 V.S.A. § 248a(c)(2), this memorandum is the recommendation of the Brookfield Planning Commission (the BPC) on the changes proposed by New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (AT&T) to an existing 75-foot monopole tower located on 2382 Ridge Road in Brookfield. The changes are described in AT&T's letter and attachments dated May 30, 2013 entitled "45-Day Notice and Request for Recommendation Pursuant to 30 V.S.A. § 248a(e)" (the 45-Day Notice). In 2009, the existing tower received conditional use and site plan approvals from the Town of Brookfield (application no. 2009.16) and a land use permit from the District No. 3 Environmental Commission (no. 3R1021).

In considering the proposed changes under 30 V.S.A. § 248a, the BPC recommends that the Public Service Board (PSB) determine that the proposed extension of the tower structure from 75 to 85 feet will have an undue adverse effect on aesthetics and scenic beauty; conclude that, under the facts and circumstances of the proposed changes and pursuant to the PSB's consideration of the general good of the state, the benefits of the changes outweigh this undue adverse effect; and issue a certificate of public good (CPG) on this basis.

With the proposed changes, the resulting tower will have an adverse effect on aesthetics and scenic beauty through the increased tower height and placement of 12 additional antennae. The District No. 3 Environmental Commission previously determined that the then-proposed (and now existing) 75-foot tower would have an adverse effect on aesthetics. In re T-Mobile Northeast LLC, Findings of Fact, Conclusions of Law, and Order No. 3R1021 at 7-8 (Dec. 1, 2009). The proposed changes will make the tower and antennae more visible from various locations in Brookfield, including places on West Street and Old Stage and Cross Roads. The industrial nature of the resulting tower will not fit within the existing rural and natural context.

Under the Quechee analysis, this adverse effect will be undue because the extension of the tower height will violate a clear written community intended to preserve the aesthetics and scenic beauty of the area. Specifically, Sec. 4.16.E.7 of the Brookfield Development Bylaw (as amended through April 12, 2010) limits the height of the facility to 10 feet above the average height of the tree line on land immediately adjoining the proposed site. The section states:

The height of the facility shall not exceed ten feet above the average height of the tree line on land immediately adjoining the proposed site. Notwithstanding the above, where the girth of the tower, antennae or related fixture does not exceed sixteen inches at any point ten feet above the tree line, additional height may be permitted subject to the approval of the Board of Adjustment and conformity with other criteria in this subsection.

This section constitutes a clear written community standard with respect to aesthetics. Sec. 4.16.A of the Brookfield Development Bylaw states that the purpose of this section is, in relevant part, “to protect the scenic qualities of Brookfield’s natural environment” The Brookfield Town Plan (as amended Jan. 24, 2011) states at 11:

All of the goals and objectives of this plan that address the visual, aesthetic, scenic or rural qualities of Brookfield are meant to be written community standards intended to preserve the aesthetics and scenic beauty of Brookfield. The Brookfield telecommunications bylaw specifically constitutes and is incorporated into this plan as such a written community standard, including but not limited to those provisions that regulate the height of telecommunications facilities.

In its approval of the existing tower at the site, the District No. 3 Environmental Commission determined that Brookfield’s telecommunications bylaw constitutes a clear, written community standard intended to preserve aesthetics and scenic beauty. Findings of Fact, Conclusions of Law, and Order No. 3R1021 at 8. It approved the existing tower in part because the tower’s height meets the town’s telecommunications bylaw. *Id.* at 8-9.

The Town Plan further states on page 11 that “[f]or the purposes of Public Service Board proceedings on telecommunications facilities, the height and other dimensional and decommissioning requirements of the telecommunications by-law specifically are incorporated into this plan as measures to conserve the scenic qualities of land in Brookfield and as recommendations of the Selectboard and the Planning Commission.”

As AT&T states in its 45-day notice, the proposed changes will result in a tower that is more than 10 feet above the average height of the tree line and that does not meet the exception for additional height provided that a 16-inch girth limit is met. 45-Day Notice at 8. The prior approval of the existing tower established an average height of the tree line in the area of 65 feet. The resulting tower will be 20 feet above the average height of the tree line and the girth of the new antenna array will be 10 feet.

However, in deciding whether to approve the proposed changes under 30 V.S.A. § 248a, the PSB will consider the general good of the state, balancing the impacts and costs of the changes with their benefits, including whether the changes support universal availability of infrastructure for transmitting voice and high-speed data, availability of wireless telecommunications services along the state’s travel corridors and in its communities, and competitive choice for consumers among telecommunications providers. 30 V.S.A. §§ 202c(b), 248a(a).

Balancing the impact discussed above against the benefits of the proposed changes, the BPC recommends that the PSB determine that the changes will be in the general good of the state and issue a CPG because of the following facts and circumstances:

- The changes will allow AT&T to increase its ability to provide 4G LTE coverage for the I-89 corridor through Brookfield and in areas of Brookfield. 45-Day Notice at 3; Exhibit E to 45-Day Notice.
- These changes will not only improve wireless services to some Brookfield residents, but also increase choice for those residents among providers of those services.
- AT&T has made significant efforts to reduce the visual intrusion of the tower extension and proposed additional antennae while still achieving these benefits. Those efforts include an extension of the tower height by 10 feet only and using mounting arrays for the proposed antennae and tower that are smaller than the typically used mounting arrays and which AT&T represents are the smallest mounting arrays that are commercially available. 45-Day Notice at 6, 8.
- AT&T represents that it will comply with all conditions in the existing conditional use and site plan approvals for the tower and its site, except for the height limit. 45-Day Notice at 9.

The BPC reached this recommendation after conducting a public meeting concerning the proposed changes on June 27, 2013. Representatives of AT&T attended the meeting. Potentially affected resident Hope Krenick attended and spoke in opposition.

In 2011, the BPC considered a similar proposal from AT&T, which AT&T subsequently did not file with the PSB. At that time, the BPC conducted two public meetings. It also received written comments from adjoining property owners who were not able to attend, expressing concern over the increased tower height and visibility and asking what is the height limit if the one contained in the town's bylaw may be exceeded. As part of the 2011 process, the BPC requested that AT&T investigate the possibility of locating a telecommunications facility on an existing silo on West Street. AT&T investigated this location and submitted correspondence stating that this location would not enable AT&T to fulfill its coverage objectives.

The BPC considered all of the information and comments received in 2011 and 2013 in deciding on its recommendation, which is made in the context of the state's current initiative to achieve "statewide cellular and broadband deployment in Vermont by the end of the year 2013" and the related expiration, on July 1, 2014, of the PSB's authority to approve towers taller than the height limit stated in the Brookfield Development Bylaw. 2011 Vt. Laws No. 53, §§ 1(a), 2; 30 V.S.A. § 248a(i).

The 45-Day Notice indicates that AT&T may propose an additional facility near the Brookfield-Williamstown border. This document does not constitute a recommendation on any such additional facility.

The BPC appreciates this opportunity to provide its recommendation and reserves the right to revise it if the application that is filed with the PSB differs from the plans and information that the BPC has reviewed or additional evidence or argument is provided to the PSB. The BPC may be contacted at brookfieldplanning@me.com.

Cc: (by e-mail unless otherwise indicated):

Susan Hudson, Clerk, PSB (by US mail)

Gregg Faber, PSB

Kane Smart, Esq.

Robert N. and Hope V. Krenick

Peter Gregory, Two Rivers

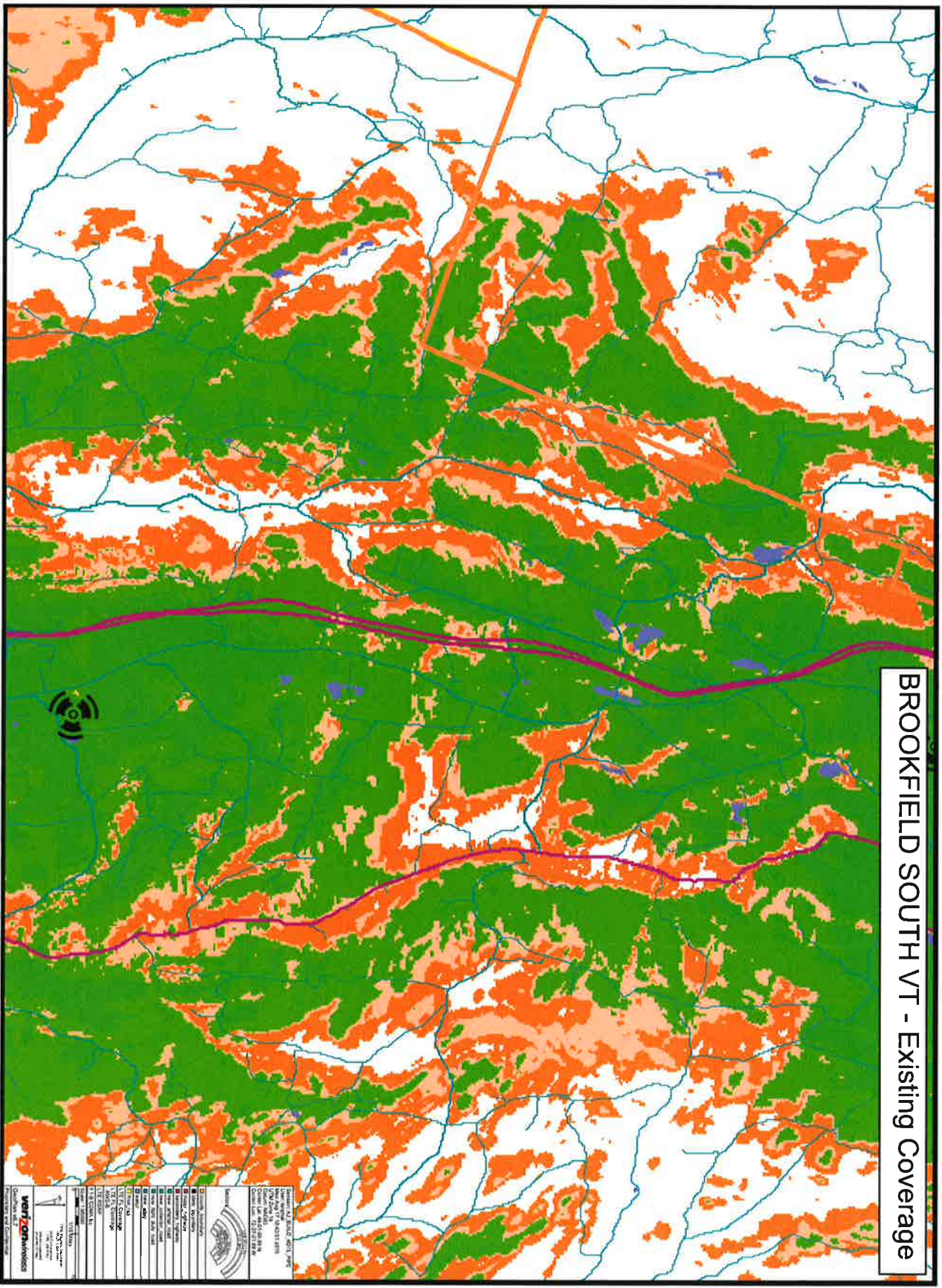
Chris Recchia, Commissioner, DPS

Jeanne Elias, Esq.

Ron Shems, Chair, Natural Resources Board

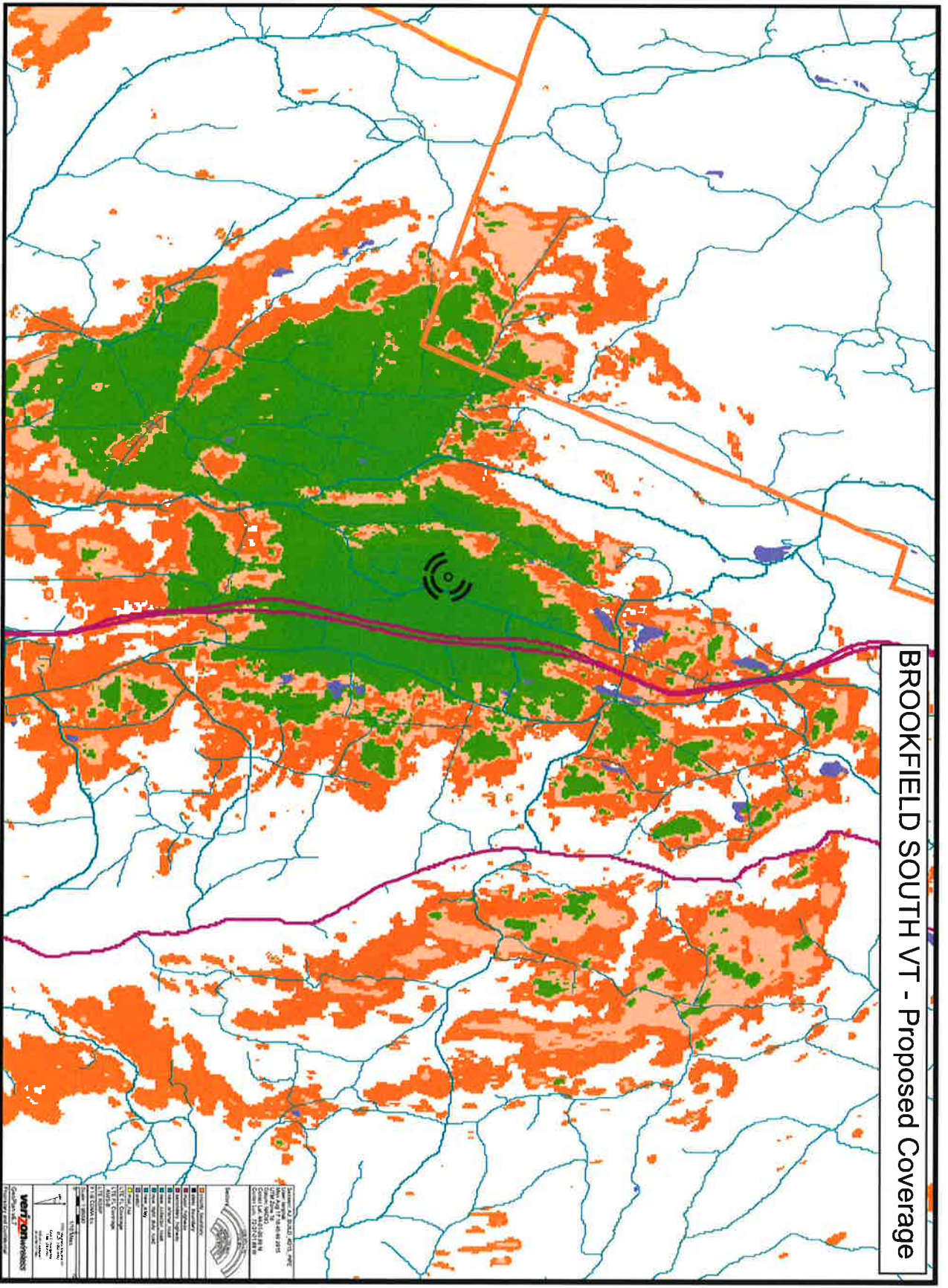
Jon Groveman, General Counsel, ANR

BROOKFIELD SOUTH VT - Existing Coverage



PROJECT INFORMATION	
PROJECT NAME	BROOKFIELD SOUTH VT - Existing Coverage
DATE	10/15/2010
SCALE	AS SHOWN
LEGEND	
1	UNDEVELOPED FOREST
2	WATER
3	ROADS
4	RESIDENTIAL
5	COMMERCIAL
6	INDUSTRIAL
7	AGRICULTURE
8	WETLANDS
9	WATERBODIES
10	ROADS
11	UNDEVELOPED FOREST
12	WATER
13	ROADS
14	RESIDENTIAL
15	COMMERCIAL
16	INDUSTRIAL
17	AGRICULTURE
18	WETLANDS
19	WATERBODIES
20	ROADS
21	UNDEVELOPED FOREST
22	WATER
23	ROADS
24	RESIDENTIAL
25	COMMERCIAL
26	INDUSTRIAL
27	AGRICULTURE
28	WETLANDS
29	WATERBODIES
30	ROADS
31	UNDEVELOPED FOREST
32	WATER
33	ROADS
34	RESIDENTIAL
35	COMMERCIAL
36	INDUSTRIAL
37	AGRICULTURE
38	WETLANDS
39	WATERBODIES
40	ROADS
41	UNDEVELOPED FOREST
42	WATER
43	ROADS
44	RESIDENTIAL
45	COMMERCIAL
46	INDUSTRIAL
47	AGRICULTURE
48	WETLANDS
49	WATERBODIES
50	ROADS
51	UNDEVELOPED FOREST
52	WATER
53	ROADS
54	RESIDENTIAL
55	COMMERCIAL
56	INDUSTRIAL
57	AGRICULTURE
58	WETLANDS
59	WATERBODIES
60	ROADS
61	UNDEVELOPED FOREST
62	WATER
63	ROADS
64	RESIDENTIAL
65	COMMERCIAL
66	INDUSTRIAL
67	AGRICULTURE
68	WETLANDS
69	WATERBODIES
70	ROADS
71	UNDEVELOPED FOREST
72	WATER
73	ROADS
74	RESIDENTIAL
75	COMMERCIAL
76	INDUSTRIAL
77	AGRICULTURE
78	WETLANDS
79	WATERBODIES
80	ROADS
81	UNDEVELOPED FOREST
82	WATER
83	ROADS
84	RESIDENTIAL
85	COMMERCIAL
86	INDUSTRIAL
87	AGRICULTURE
88	WETLANDS
89	WATERBODIES
90	ROADS
91	UNDEVELOPED FOREST
92	WATER
93	ROADS
94	RESIDENTIAL
95	COMMERCIAL
96	INDUSTRIAL
97	AGRICULTURE
98	WETLANDS
99	WATERBODIES
100	ROADS

BROOKFIELD SOUTH VT - Proposed Coverage



VT ZONE 1
COMMERCIAL
RESIDENTIAL
INDUSTRIAL
AGRICULTURAL
UNDEVELOPED
WATERBODIES
ROADS
RAILROADS
POWER LINES
CITY BOUNDARIES
COUNTY BOUNDARIES
STATE BOUNDARIES

Legend

- Proposed Coverage
- Existing Coverage
- Water
- Roads
- Railroads
- Power Lines
- City Boundaries
- County Boundaries
- State Boundaries

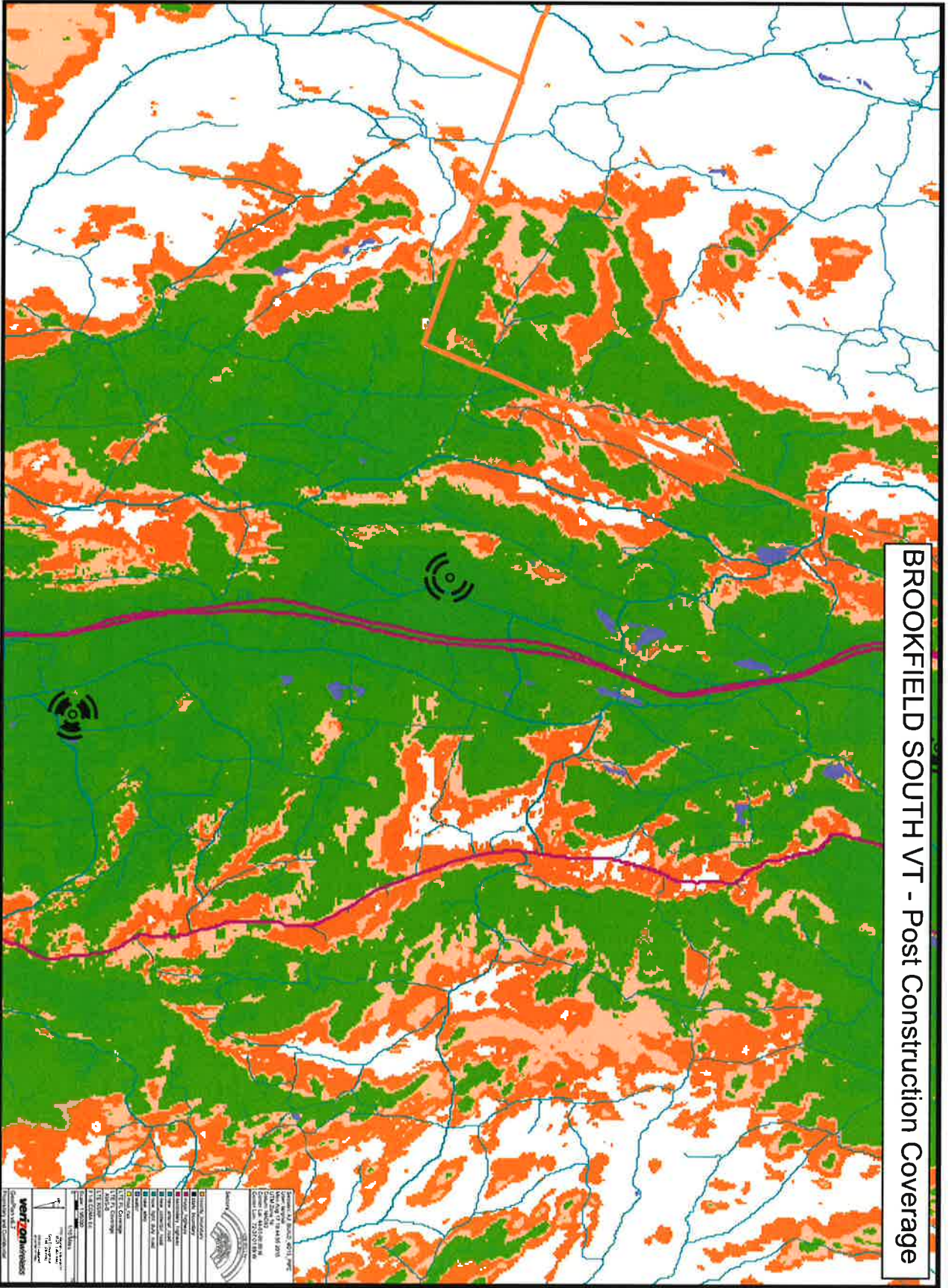
Scale

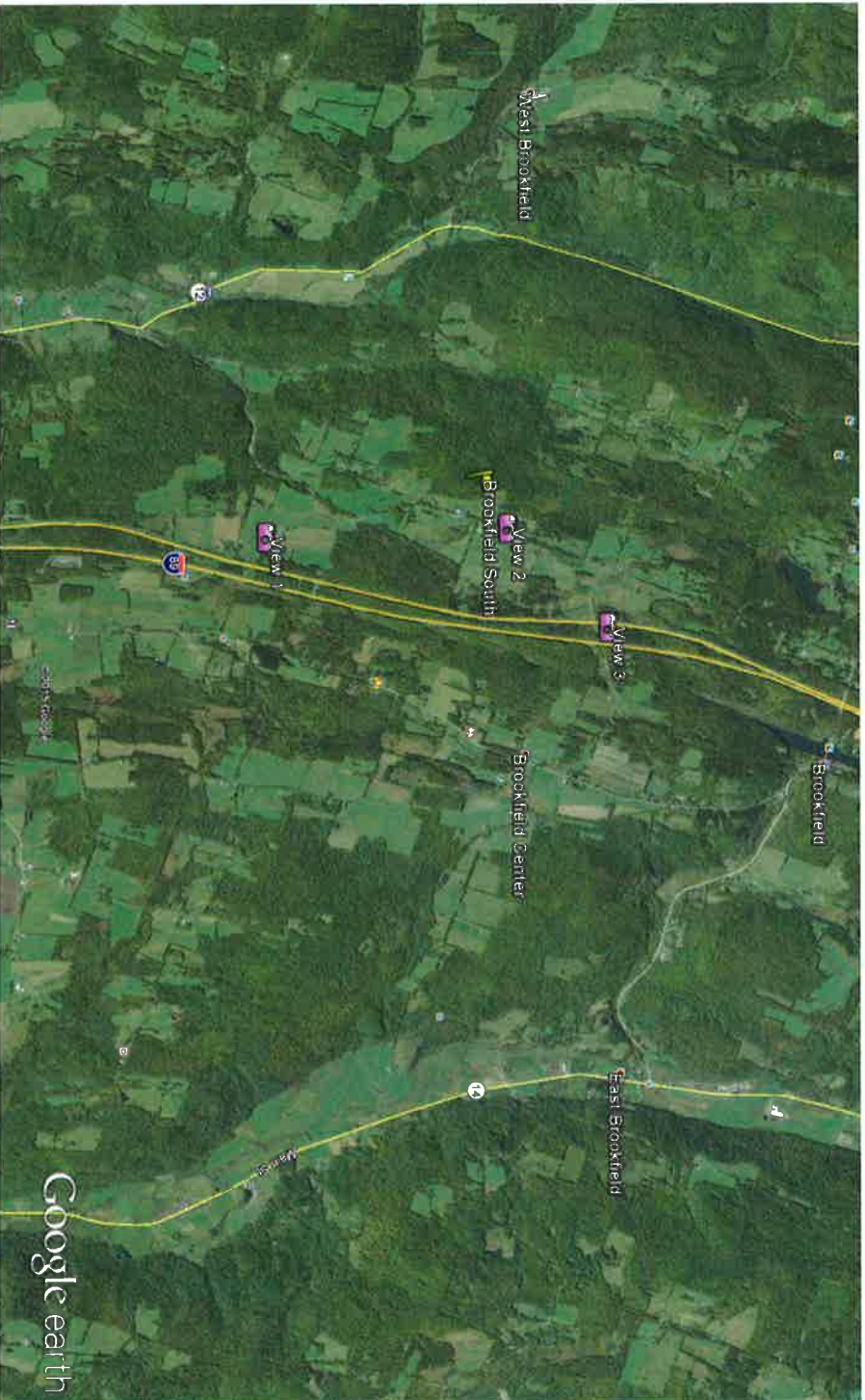
0 1 2 3 4 5 6 7 8 9 10 Miles

North Arrow

VT ZONE 1
COMMERCIAL
RESIDENTIAL
INDUSTRIAL
AGRICULTURAL
UNDEVELOPED
WATERBODIES
ROADS
RAILROADS
POWER LINES
CITY BOUNDARIES
COUNTY BOUNDARIES
STATE BOUNDARIES

BROOKFIELD SOUTH VT - Post Construction Coverage





Google earth

miles

km



4

7



Google earth



Photograph Information

Viewer Location: West St. Exd., Brookfield, VT

Orientation: facing North-northwest

Distance to Site: 1.01 miles

Date & Time: 3/16/15, 2:20pm

Focal Length (35mm equivalent): 52mm

Brookfield South

Existing VP-1





Photograph Information

Viewer Location: West St. Exd., Brookfield, VT

Orientation: facing North-northwest

Distance to Site: 1.01 miles

Date & Time: 3/16/15, 2:20pm

Focal Length (35mm equivalent): 52mm

Brookfield South

Proposed VP-1

110 ft. Monopole





Photograph Information

Viewer Location: West St., Brookfield, VT

Orientation: facing Southwest

Distance to Site: 0.29 miles

Date & Time: 3/16/15, 2:30pm

Focal Length (35mm equivalent): 52mm

Brookfield South

Existing VP-2





Photograph Information

Viewer Location: West St., Brookfield, VT

Orientation: facing Southwest

Distance to Site: 0.29 miles

Date & Time: 3/16/15, 2:30pm

Focal Length (35mm equivalent): 52mm

Brookfield South

Proposed VP-2

110 ft. Monopole





Photograph Information

Viewer Location: Crossover Rd., Brookfield, VT

Orientation: facing Southwest

Distance to Site: 0.99 miles

Date & Time: 3/16/15, 2:40pm

Focal Length (35mm equivalent): 52mm

Brookfield South

Existing VP-3





Photograph Information

Viewer Location: Crossover Rd., Brookfield, VT

Orientation: facing Southwest

Distance to Site: 0.99 miles

Date & Time: 3/16/15, 2:40pm

Focal Length (35mm equivalent): 52mm

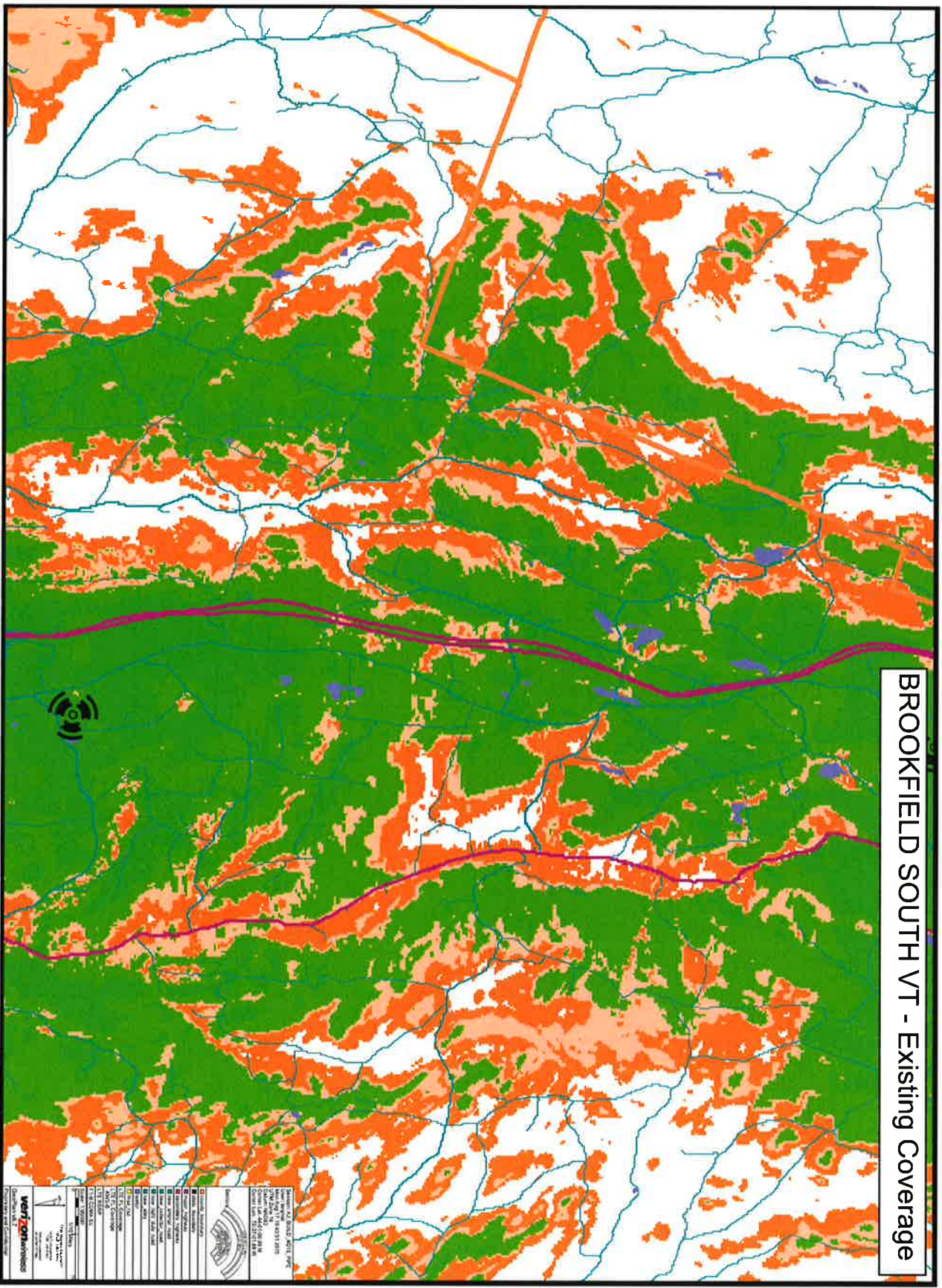
Brookfield South

Proposed VP-3

110 ft. Monopole



BROOKFIELD SOUTH VT - Existing Coverage



Legend

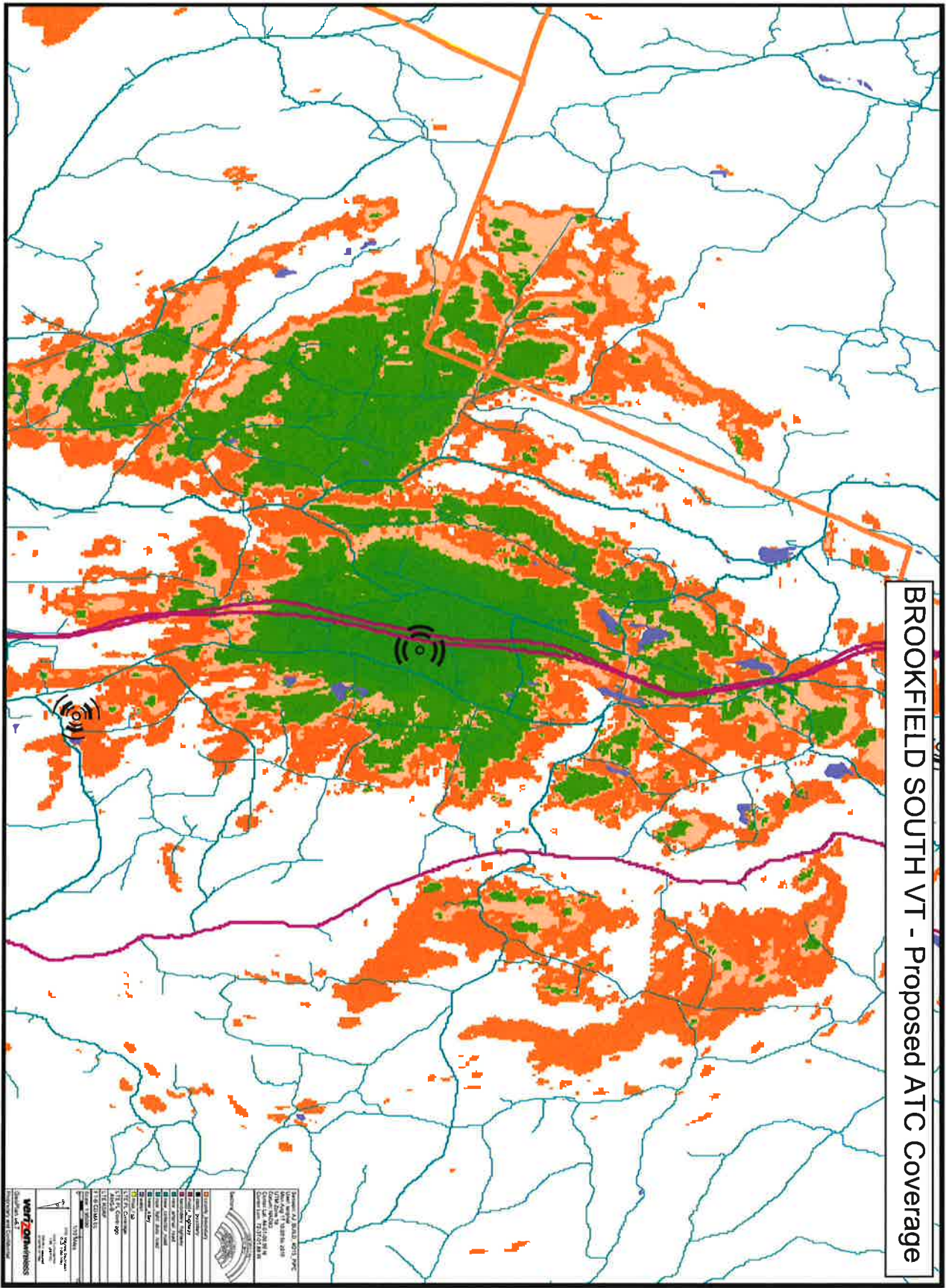
Water	Blue
Highway	Orange
Major Road	Thick Orange
Minor Road	Thin Orange
Water	Blue
Wetland	Light Green
Forest	Dark Green
Open Space	White
Other	Light Orange

Scale: 1 inch = 1 mile

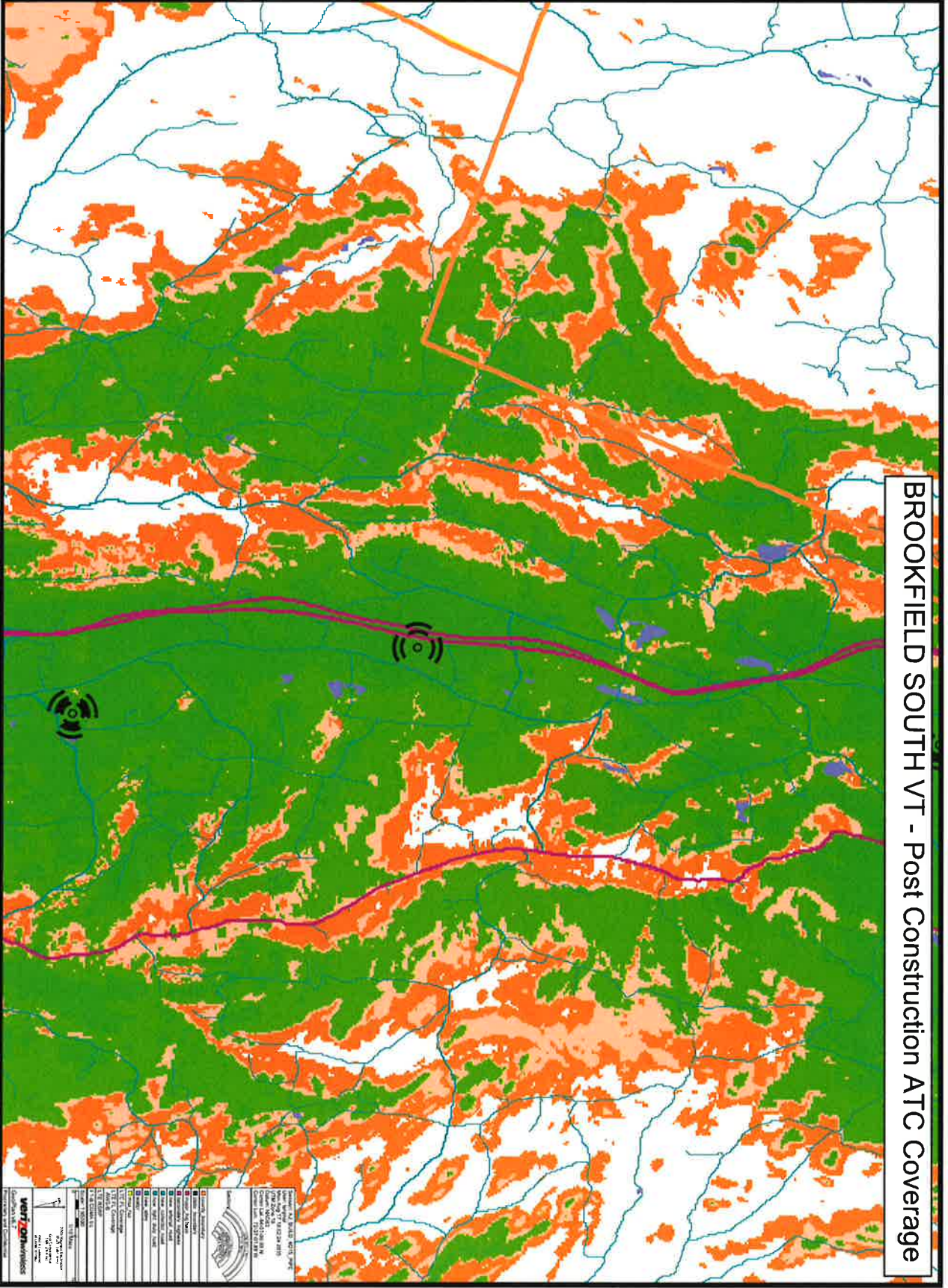
North Arrow

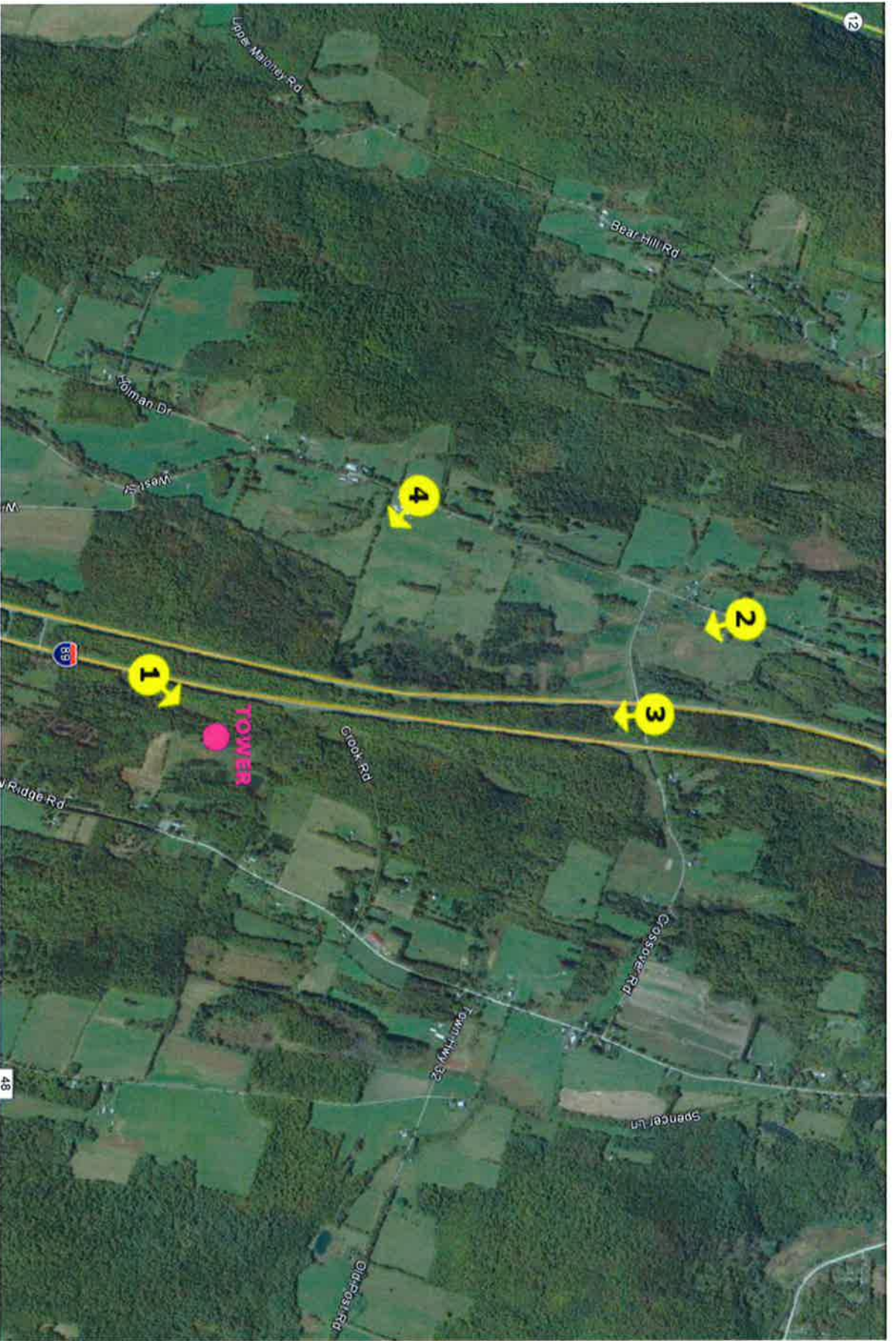
VERT ZONING SERVICES
CANTON, VT

BROOKFIELD SOUTH VT - Proposed ATC Coverage



BROOKFIELD SOUTH VT - Post Construction ATC Coverage





Brookfield South

2382 Ridge Road

Location Map





Photograph Information

Viewer Location: 189N mile marker 35.35, Brookfield, VT

Orientation: facing Northeast

Distance to Site: 0.22 miles

Date & Time: 8/18/15, 11:00am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Existing VP-1





Photograph Information

Viewer Location: 189N mile marker 35.35., Brookfield, VT

Orientation: facing Northeast

Distance to Site: 0.22 miles

Date & Time: 8/18/15, 11:00am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Proposed Tower Extension

VP-1





Photograph Information

Viewer Location: 2229 West Street, Brookfield, VT
Orientation: facing South-Southeast
Distance to Site: 1.29 miles
Date & Time: 8/18/15, 11:25am
Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road
Existing VP-2





Photograph Information

Viewer Location: 2229 West Street, Brookfield, VT

Orientation: facing South-Southeast

Distance to Site: 1.29 miles

Date & Time: 8/18/15, 11:25am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Proposed Tower Extension

VP-2





Photograph Information

Viewer Location: Crossover Rd. west of 189S, Brookfield, VT

Orientation: facing South

Distance to Site: 1.05 miles

Date & Time: 8/18/15, 11:30am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Existing VP-3





Photograph Information

Viewer Location: Crossover Rd. west of 1895, Brookfield, VT
Orientation: facing South
Distance to Site: 1.05 miles
Date & Time: 8/18/15, 11:30am
Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road
Proposed Tower Extension
VP-3





Photograph Information

Viewer Location: 3011 West Street, Brookfield, VT

Orientation: facing Southeast

Distance to Site: 0.75 miles

Date & Time: 8/18/15, 11:40am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Existing VP-4





Photograph Information

Viewer Location: 3011 West Street, Brookfield, VT

Orientation: facing Southeast

Distance to Site: 0.75 miles

Date & Time: 8/18/15, 11:40am

Focal Length (35mm equivalent): 52mm

Brookfield South

2382 Ridge Road

Proposed Tower Extension

VP-4

