

MAIN OFFICE 605 THIRD STREET ENCINITAS, CALIFORNIA 92024 T 760.942.5147 T 800.450.1818 F 760.632.0164

MEMORANDUM

To:	Kelly Mullin, Washoe County Planning and Development
From:	David Hochart, Dudek, on behalf of Dodge Flat Solar, LLC
Subject:	Administrative Permit Application Package for the Dodge Flat Solar Energy
	Center – Development of Two Monopoles
Date:	December 12, 2017
cc:	Eric Koster, Dodge Flat Solar LLC
	Jesse Marshall, Dodge Flat Solar LLC
Attachments:	Attachment A, Pad Elevations

Enclosed is the Administrative Permit Application Package for the Dodge Flat Solar Energy Center (Project) in Washoe County, Nevada. The Administrative Permit Application is being submitted for the development of two telecommunications monopoles associated with the Project, which is being processed concurrently with the County (Case #WSUP-17-0021).

Table 1, Administrative Permit Application Submittal Requirements, has been provided to demonstrate applicability of Administrative Permit submittal requirements and current submittal status.

No.	Submittal Requirements	Applicable (Y/N)	Status /Rationale (If Applicable)
1	Fees: See Master Fee Schedule. Bring payment with your application to Community Services Department (CSD). Make check payable to Washoe County. (Note: All fees are waived for Administrative Permits for "temporary occupancy for the care of the infirm" [see Washoe County Code Section 110.310.35(g)]; however, the Administrative Permit Application process is still required.)	Y	A check in the amount of \$2,087.72 is made payable to Washoe County and enclosed per the Master Fee Schedule
2	Development Application: A completed Washoe County Development Application form.	Y	Enclosed
3	Owner Affidavit: The Owner Affidavit must be signed and notarized by all owners of the property subject to the application request.	Y	Enclosed

Table 1Administrative Permit Application Submittal Requirements

Subject: Administrative Permit Application Package for the Dodge Flat Solar Energy Center – Development of Two Monopoles

4	Proof of Property Tax Payment: The applicant must provide a written statement from the Washoe County Treasurer's Office indicating all property taxes for the current quarter of the fiscal year on the land have been paid.	Y	Enclosed
5	Application Materials: The completed Administrative Permit Application materials. (Some Administrative Permits, due to the minor impact of the application, will not require some of the requirements. You are encouraged to meet with a planner to determine the applicability of individual requirements.)	Y	Enclosed
6	 Title Report: A preliminary title report, with an effective date of no more than one hundred twenty (120) days of the submittal date, by a title company which provides the following information: Name and address of property owners. Legal description of property.\Description of all easements and/or deed restrictions. Description of all liens against property Description of all liens against property Any covenants, conditions and restrictions (CC&Rs) that apply. Submit Title Report with "Original Packet" only. You may be requested to provide additional copies, but do not include Title Report in other copies of the packet. 	Y	Enclosed
7	Site Plan Specifications :	Y	Enclosed
	 a. Lot size with dimensions drawn using standard engineering scales (e.g. scale 1" = 100', 1" = 200', or 1" = 500') showing all streets and ingress/egress to the property. 		
	 b. Show the location and configuration of all proposed buildings (with distances from the property lines and from each other), all existing buildings that will remain (with distances from the property lines and from each other), all existing buildings that will be removed, and site improvements on a base map with existing and proposed 		

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8	 topography expressed in intervals of no more than five (5) feet. c. Show the location and configuration of wells and well houses, septic systems and leach fields, overhead utilities, water and sewer lines, and all easements. d. Show locations of parking, landscaping, signage and lighting. Traffic Impact Report Traffic impact reports are required whenever the proposed development project will generate 80 or more weekday peak hour trips as determined using the latest edition Institute of Transportation Engineers (ITE) trip generation rates or other such sources as may be accepted by the Engineering and Capital Projects. Projects with less than 200 peak hour trips may not need to perform an impact analysis for future years. Traffic consultants are encouraged to contact Engineering and Capital Projects staff prior to preparing a traffic impact report. (See attached Traffic Impact Report Guidelines.) 	N	Per discussions with County Staff a Traffic Impact Report is not required for a telecommunication facility.
9	 Floor Plan Specifications: a. If the project involves the use or construction of a building, include floor plans of the building(s). b. If the project involves the construction of an addition to a building or expansion of previously constructed structures, include floor plans of the existing and proposed construction. 	N	Floor Plan specifications will be prepared at a future date when an engineering, procurement construction (EPC) contractor is selected to design/build the proposed project.
10	Landscaping: Landscape plans may be required, for stables. Landscape plans may include: a soils evaluation; color and type of building material, such as fencing material; type of plant material; location of plant material and proposed maintenance schedule; size of plant material at planting and size of plant material at full maturation; type and amount of mulch material; and an irrigation plan. a. Planting Plan Specifications: The planting	Ν	Per discussions with County Staff a landscaping plan is not required for the proposed telecommunication facility.

Subject: Administrative Permit Application Package for the Dodge Flat Solar Energy Center – Development of Two Monopoles

	 to satisfy Washoe County Code Section 110.412.60, Planting Standards. Location, spacing, size, and genus and/or species of proposed plantings, and identification of existing plants. Existing vegetation, natural features, and site improvements on adjoining properties within ten (10) feet of the property line. Plant list which includes the following: quantity of proposed plants; existing plants to remain; number of proposed trees; number of existing trees to be preserved; amount of paved area; and the amount of turf. Irrigation Plan Specifications. The irrigation plan must include all necessary information to satisfy Washoe County Code Section 110.412.65 Irrigation Standards. Location, size, and specifications of water source(s), water mains, meter(s), valves, and the controller Temporary or permanent water irrigation systems Specifications of irrigation equipment identified by manufacturer's name and equipment identification number An approved backflow prevention device is required on all landscape irrigation systems. 		
11	Signage Plan: Show the location and configuration of all proposed signage including sign dimensions, sign materials, and methods and intensity of lighting.	N	A signage plan will be prepared at a future date when an engineering, procurement construction (EPC) contractor is selected to design/build the proposed project.

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12	Lighting Plan: Show the location and configuration of all proposed exterior lighting including a detail of the parking lot light fixtures, pole heights, security lighting, and wall mounted illumination fixtures. Parking lot areas shall be depicted showing lumen isolines demonstrating compliance with the provisions of the Washoe County Development Code.	N	A lighting plan will be prepared at a future date when an engineering, procurement construction (EPC) contractor is selected to design/build the proposed project.
13	Building Elevations: All buildings and structures including fences, walls, poles and monument signs proposed for construction within the project shall be clearly depicted in vertical architectural drawings provided in accurate architectural scale. All architectural elevations from all building faces shall be presented.	N	Elevations are included in Attachment A, Pad Elevations.
14	Packets: Four (4) packets and a flash drive or DVD. One (1) packet must be labeled "Original" and must include the fee schedule (including the appropriate fees) and the original signed and notarized Owner Affidavit. Each packet shall include an 8.5" x 11" reduction of any applicable site plan, development plan, and/or application map. These materials must be readable. Labeling on these reproductions should be no smaller than 8 point on the $8\frac{1}{2}$ x 11" display. Two (2) of the application packets shall include large format maps; the rest of the packets shall include either 8.5" x 11" or 11" x 17" maps. Large format sheets should be included in a slide pocket(s). Any specialized reports identified above shall be included as attachments or appendices and be annotated as such.	Y	See packets attached.

Notes:

(i) Application and map submittals must comply with all specific criteria as established in the Washoe County Development Code and/or the Nevada Revised Statutes.

(ii) Appropriate map engineering and building architectural scales are subject to the approval of Planning and Development and/or Engineering and Capital Projects.

(iii) All oversized maps and plans must be folded to a 9" x 12" size.

(iv) Based on the specific nature of the development request, Washoe County reserves the right to specify additional submittal packets, additional information and/or specialized studies to clarify the potential impacts and potential conditions of development to minimize or mitigate impacts resulting from the project. No application shall be processed until the information necessary to review and evaluate the proposed project is deemed complete by the Director of Community Development.

(v) Labels: The applicant is required to submit three (3) sets of mailing labels for every tenant residing in a mobile home park that is within five hundred (500) feet of the proposed project (or within seven hundred fifty (750) feet of the proposed project if the proposed project is a project of regional significance).

Administrative Permit Application

Community Services Department Planning and Building ADMINISTRATIVE PERMIT APPLICATION (Care for the Infirm see page 9)



Community Services Department Planning and Building 1001 E. Ninth St., Bldg. A Reno, NV 89520

Telephone: 775.328.6100

Washoe County Development Application

Your entire application is a public record. If you have a concern about releasing personal information, please contact Planning and Building staff at 775.328.6100.

Project Information	S	taff Assigned Case No.:			
Project Name: Dodge F	Flat Solar E	Energy Center			
Description approximately 90 feet in	Project Development of two telecommunication monopoles with antenna dishes. The telecommunication monopoles would be				
Project Address: 2505 State Ro	ute 447, Nevada				
Project Area (acres or square fee	et): Each monopole would require a work space	of approximately 50 feet by 50 feet to construct and operate and would be locate	ed within the Dodge Flat Solar Energy Center project		
Project Location (with point of re	ference to major cross	streets AND area locator):			
Olinghouse Road, just we	st of SR-447; Lat	titude/Longitude 39°39'31N	l / 119°20'53"W		
Assessor's Parcel No.(s):	Parcel Acreage:	Assessor's Parcel No.(s):	Parcel Acreage:		
079-150-29	600				
		25,36; T21N R24S, Sec. 19,30,31 I			
		s associated with this applicat P17-0021 (Under Review)	ion:		
		additional sheets if necess	ary)		
Property Owner: New Nevada	Lands, LLC	Professional Consultant: DU	DEK		
Name: Heath Rushing		Name: David Hochart			
Address: 125 Roger Storme Roa	ad	Address: 605 Third Street, Encir	nitas, CA		
Modisonville, LA	Zip: 70447		Zip: 92024		
Phone: 601-876-7659	Fax:	Phone: 760.479.4259	Fax:		
Email: heath@newnr.com		Email: dhochart@dudek.com			
Cell:	Other:	Cell: 760.415.2864	Other:		
Contact Person: Heath Rushing		Contact Person: David Hochart			
Applicant/Developer:		Other Persons to be Contact	ed:		
Name: Dodge Flat Solar LLC		Name: Eric Koster			
Address: 700 Universe Bouleva	rd, Juno Beach, FL	Address: 949 Twilight Avenue, H	Henderson, NV		
	Zip: 33408		Zip: 89012		
Phone: 760.846.4421	Fax:	Phone: 702.335.2849	Fax:		
Email: jesse.marshall@nee.com	1	Email: eric.koster@nee.com			
Cell:	Other:	Cell:	Other:		
Contact Person: Jesse Marshall		Contact Person: Eric Koster			
	For Office	Use Only			
Date Received:	Initial:	Planning Area:			
County Commission District:		Master Plan Designation(s):			
CAB(s):		Regulatory Zoning(s):			

Administrative Permit Application Supplemental Information

(All required information may be separately attached)

Chapter 110 of the Washoe County Code is commonly known as the Development Code. Specific references to administrative permits may be found in Article 808, Administrative Permits.

1. What is the type of project or use being requested?

Development of two telecommunication monopoles with antenna dishes. The telecommunication monopoles would be approximately 90 feet in height and would be used for ensuring energy grid system reliability. The facilities are associated with the Dodge Flat Solar Energy Center that is being processed concurrently with Washoe County (see Attachment A). The telecommunication monopoles would be located within the Dodge Flat Solar Energy Center project footprint at the Olinghouse Switching Station and Project Substation. Note the Special Use Permit associated with the solar facility (Case #WSUP17-0021) is currently under review.

2. What currently developed portions of the property or existing structures are going to be used with this permit?

The subject property is undeveloped except for the rural roads, high-voltage electrical lines and underground water and gas pipelines that cross the property.

3. What improvements (e.g. new structures, roadway improvements, utilities, sanitation, water supply, drainage, parking, signs, etc.) will have to be constructed or installed and what is the projected time frame for the completion of each?

The proposed telecommunication facilities would be located within the limits of the project substation and Olinghouse Switching Station (see Attachment A). No further improvements beyond those described in the Special Use Permit (Case #WSUP-17-0021) for the Dodge Flat Solar Energy Center would be required.

4. What is the intended phasing schedule for the construction and completion of the project?

The telecommunication facilities would be cons	structed concurrently with the
Dodge Flat Solar Energy Center.	·

5. What physical characteristics of your location and/or premises are especially suited to deal with the impacts and the intensity of your proposed use?

Energy facilities and associated telecommunication monopoles is an ideal use for the subject properties given the topography is gently sloping, with an average slope of 2%-3% for the proposed developed area. The project site is also located adjacent to regional roadway facilities (SR-447) and high-voltage transmission lines, which minimizes the need for off-site improvements.

The property is located within an area that has a contiguous zoning of General Rural, and therefore does not conflict with any immediately adjacent current or allowed uses. There are no significant residential developments within the immediate vicinity, or within the general project view shed.

6. What are the anticipated beneficial aspects or effect your project will have on adjacent properties and the community?

The telecommunication facilities would provide essential communication with the regional electric grid operator to support a reliable local and regional source of power, producing around 500,000 megawatt-hours of clean, emissions-free power each year. The project also includes an energy storage component that will facilitate grid reliability with providing energy delivery during peak demand periods.

Compared to Nevada's current average power emissions, this project will allow for the reduction of around 510,000 tons of carbon dioxide annually.

By locating the project near a State Highway, and directly adjacent to existing transmission lines, the project can be built with minimal additional infrastructure, minimizing additional property impacts and emissions during construction.

The proposed project will provide an opportunity for construction jobs as at the peak construction, close to 500 workers; average workforce of approximately 250 construction workers. The project would also provide approximately 10 full time jobs.

7. What will you do to minimize the anticipated negative impacts or effect your project will have on adjacent properties?

Surrounding lands include public lands managed by the Bureau of Land Management (BLM) and lands within with Pyramid Lake Indian Reservation managed by the Pyramid Lake Tribal Council. All lands surrounding the study area are designated "Rural" within the Washoe County Master Plan (WCMP) (Washoe County 2012). In the Truckee Canyon Area Plan (TCAP), surrounding lands are currently assessed as "Undeveloped" (Public Lands), "Industrial" (Reservation), and other private lands include a mix of "Low Density Rural," "Medium Density Suburban," "Vacant-Minor Improvements Common Area," and "Agricultural" (Washoe County 2012). The construction of telecommunication facilities is considered to be consistent with the existing land use and zoning, and is not anticipated to have any adverse impacts or effects on these neighboring properties.

8. Please describe operational parameters and/or voluntary conditions of approval to be imposed on the administrative permit to address community impacts.

There are no anticipated impacts that would require special defined operational parameters or conditions to address community impacts.

9. How many improved parking spaces, both on-site and off-site, are available or will be provided? (Please indicate on site plan.)

Permanent on-site parking will not be required, as the facilities will be primarily operated remotely. Operations and maintenance staff will visit the site as needed to complete any repairs. There will not be any permanently manned structures on site.

10. What types of landscaping (e.g. shrubs, trees, fencing, painting scheme, etc.) are proposed? (Please indicate location on site plan.)

Due to the proposed use, zoning, existing terrain, and high-voltage transmission towers that traverse the parcel where the telecommunication facilities would be developed, landscaping has not been proposed, and would not be appropriate.

11. What type of signs and lighting will be provided? On a separate sheet, show a depiction (height, width, construction materials, colors, illumination methods, lighting intensity, base landscaping, etc.) of each sign and the typical lighting standards. (Please indicate location of signs and lights on site plan.)

FAA lighting will be incorporated as part of the telecommunication facilities as required by FAA.

12. Are there any restrictive covenants, recorded conditions, or deed restrictions (CC&Rs) that apply to the area subject to the administrative permit request? (If so, please attach a copy.)

🖵 Yes	No No
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13. Utilities:

a. Sewer Service	No service available
b. Water Service	No service available

For most uses, the Washoe County Code, Chapter 110, Article 422, Water and Sewer Resource Requirements, requires the dedication of water rights to Washoe County. Please indicate the type and quantity of water rights you have available should dedication be required:

c. Permit #	85241, 85242, 85243	acre-feet per year	1428
d. Certificate #		acre-feet per year	
e. Surface Claim #		acre-feet per year	
f. Other, #		acre-feet per year	

I. Title of those rights (as filed with the State Engineer in the Division of Water Resources of the Department of Conservation and Natural Resources):

Nevada Land and Resource Holding, Inc.

Owner Affidavit

Property Owner Affidavit

Applicant Name: Dodge Flat Solar, LLC

The receipt of this application at the time of submittal does not guarantee the application complies with all requirements of the Washoe County Development Code, the Washoe County Master Plan or the applicable area plan, the applicable regulatory zoning, or that the application is deemed complete and will be processed.

STATE OF NEVADA COUNTY OF WASHOE OF NEW NEVADA LAND,LLC MANAGING MEMBER SHING

being duly sworn, depose and say that I am the owner* of the property or properties involved in this application as listed below and that the foregoing statements and answers herein contained and the information herewith submitted are in all respects complete, true and correct to the best of my knowledge and belief. I understand that no assurance or guarantee can be given by members of Planning and Development.

(A separate Affidavit must be provided by each property owner named in the title report.)

Assessor Parcel Number(s):	079-150-29
	Printed Name Signed
	Address 125 Roger Starme Road
	Madisonville, LA 70447
Subscribed and sworn to	before me this (Notary Stamp) TRACY A. SALVAGGIO
Notary Public in and for said of My commission expires:	ounty and state Notary Public #84772 State of Louisiana My Commission is issued for life
 Owner Corporate Officer/Part Power of Attorney (Price) Owner Agent (Provide) Property Agent (Provide) 	(Please mark appropriate box.) mer (Provide copy of recorded document indicating authority to sign.) ovide copy of Power of Attorney.) a notarized letter from property owner giving legal authority to agent.) de copy of record document indicating authority to sign.) nt Agency with Stewardship

RESOLUTION ACKNOWLEDGING AND AUTHORIZING SUCCESSOR MANAGER FOR NEW NEVADA LANDS, LLC

In accordance with Paragraph 7.1(b) of the Operating Agreement of NEW NEVADA LANDS, LLC, a Florida limited liability company, and, whereas it is deemed in the best interest of the limited liability company and its member(s) that the company take certain actions:

RESOLVED, That upon the death of M. C. Davis on July 11, 2015, **HEATH A**. **RUSHING**, automatically became the successor Manager of New Nevada Lands, LLC is hereby authorized, empowered, and directed on behalf of **NEW NEVADA LANDS**, **LLC** to perform all of the duties as described for such position in the Operating Agreement executed effective November 4, 2011, and

THAT, this Resolution may be executed in multiple originals or counterparts, all of which taken together shall be but one and the same document and that a facsimile or electronic copy of the signature below shall be binding upon all parties and shall be as enforceable and binding as the original.

NEW NEVADA LANDS, LLC, a Mississippi limited liability company

BY: Heath Rushing, Manager

Dated:

Proof of Property Tax Payment

Washoe County Treasurer P.O. Box 30039, Reno, NV 89520-3039 ph: (775) 328-2510 fax: (775) 328-2500 Email: tax@washoecounty.us

Washoe County Treasurer Tammi Davis

Account Detail

Back to Account Detail Change of Address Print this Page **Washoe County Parcel Information** Parcel ID Status Last Update 8/31/2017 2:10:40 07915029 Active AM **Current Owner:** SITUS: 0 STATE ROUTE 447 NEW NEVADA LANDS LLC

PO BOX 805 DESTIN, FL 32540 WCTY NV

Taxing District	Geo CD:	
	Legal Description	
Section 23 Range 23 Subdivision	Name _UNSPECIFIED Township 21	

Tax Bill (Click on desired tax year for due dates and further details)

Tax Year	Net Tax	Total Paid	Penalty/Fees	Interest	Balance Due
2017	\$67.74	\$67.74	\$0.00	\$0.00	\$0.00
2016	\$66.02	\$66.02	\$0.00	\$0.00	\$0.00
2015	\$65.89	\$65.89	\$0.00	\$0.00	\$0.00
2014	\$63.84	\$63.84	\$0.00	\$0.00	\$0.00
2013	\$61.98	\$61.98	\$0.00	\$0.00	\$0.00
				Total	\$0.00

Important Payment Information

- ALERTS: If your real property taxes are delinquent, the search results displayed may not reflect the correct amount owing. Please contact our office for the current amount due.
- · For your convenience, online payment is available on this site. E-check payments are accepted without a fee. However, a service fee does apply for online credit card payments. See Payment Information for details.

The Washoe County Treasurer's Office makes every effort to produce and publish the most current and accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use, or its interpretation. If you have any questions, please contact us at (775) 328-2510 or tax@washoecounty.us

This site is best viewed using Google Chrome, Internet Explorer 11, Mozilla Firefox or Safari.

Mailing Address: P.O. Box 30039 Reno, NV 89520-3039 Overnight Address: 1001 E. Ninth St., Ste D140 Reno, NV 89512-2845 📕 Payment Information **Special Assessment** District **Installment** Date Information Assessment Information

Pay Online

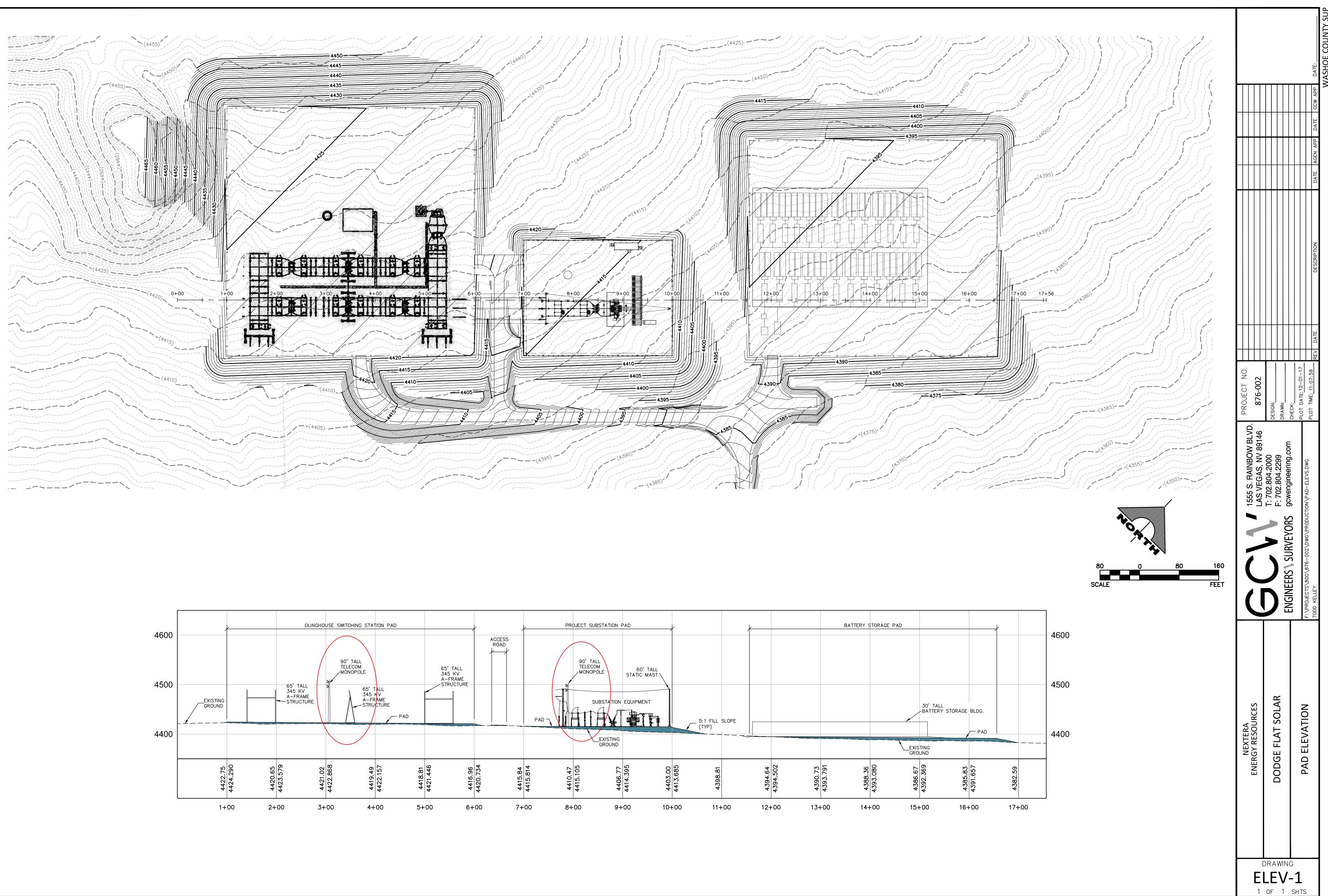
No payment due for this account.

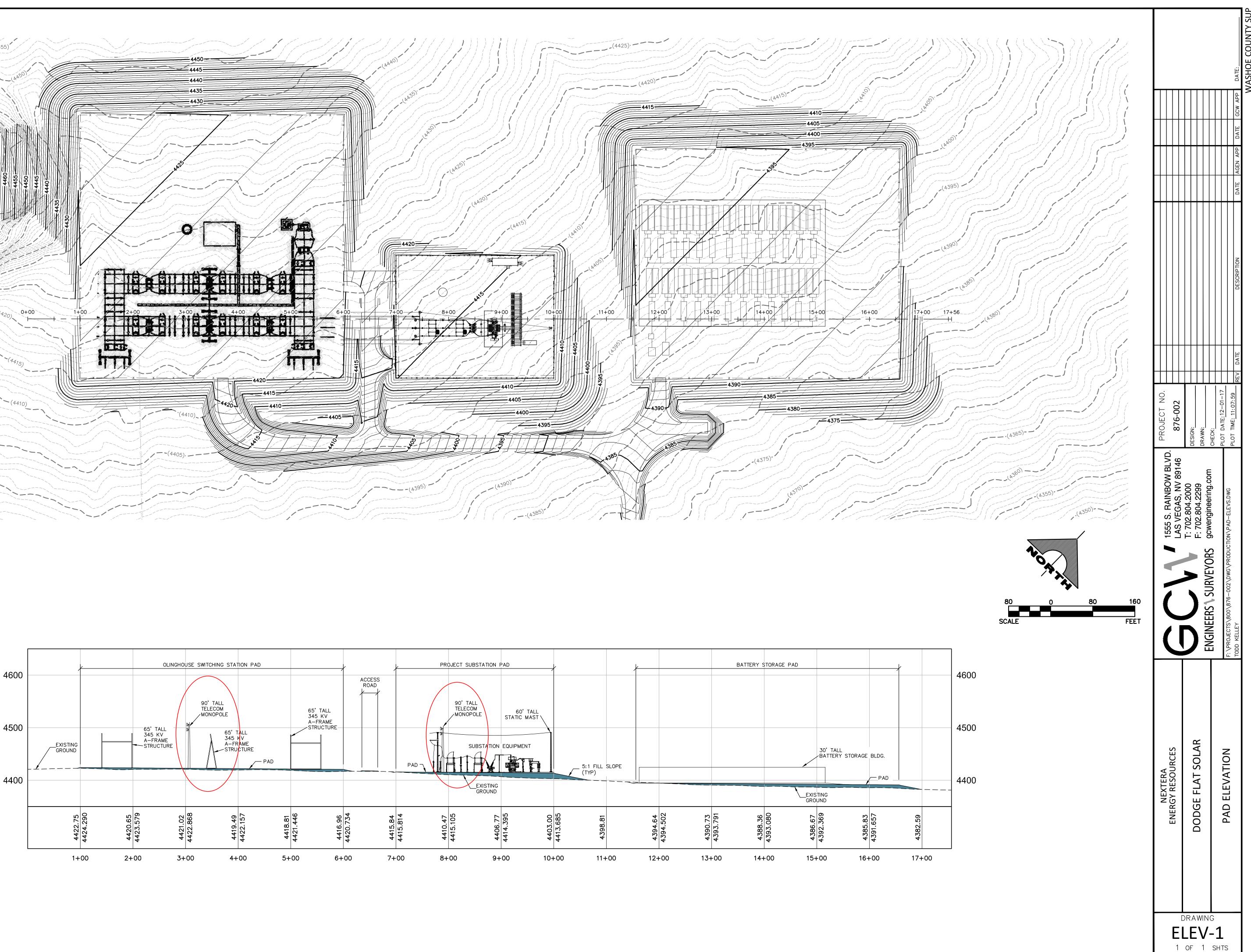
\$0.00

Pay By Check

Please make checks payable to: WASHOE COUNTY TREASURER

Attachment A - Pad Elevations







MAIN OFFICE 605 THIRD STREET ENCINITAS, CALIFORNIA 92024 T 760.942.5147 T 800.450.1818 F 760.632.0164

MEMORANDUM

To:	Kelly Mullin, Senior Planner – Washoe County
From:	David Hochart, Project Manager – Dudek
Subject:	Dodge Flat Solar – WSUP 17-0021 & WADMIN17-0010
Date:	December 15, 2017

Attachment(s): A – Distances from Monopoles to Nearest Property Line

The following memorandum provides responses to an email inquiry that was received on December 13, 2017. Questions presented by Washoe County are provided below in *ITALICS* and responses prepared by Dodge Flat Solar LLC are included below the question.

(1) The application describes two 90-foot-tall monopoles. Last time I spoke with the group, a 210-fttall monopole was proposed. Before we send this out to agencies, I'd like to confirm that the 90-footers are correct and the 210-footer is off the table.

• Correct, 90-foot tall monopoles are being proposed as part WADMIN 17-0010. The 210 foot tall monopole discussed previously was an error.

(2) This Admin Permit is needed for the specific purpose of allowing additional height to private communication antennas (otherwise max height allowed would be 45-ft). As part of the review, we need to be able to clearly understand why the additional height above 45-ft is necessary. In turn, the Planning Commission will need to be able to make 2 additional findings related to the height in order to approve the request. In the email string below, I've highlighted the section of Code that's relevant here. Please provide a supplemental memo explicitly describing why the additional height is necessary. This will be a critical piece of our review for the monopoles.

• As seen in the project description included in WSUP 17-0021, the project includes two communication towers; one tower is needed for NV Energy to monitor equipment at the Olinghouse Switching Station being constructed by NV Energy, and the second communication tower is needed by Dodge Flat Solar LLC to monitor operations at the Project Substation owned and operated by Dodge Flat Solar LLC.

The proposed project would utilize a supervisory control and data acquisition (SCADA) system to monitor operations of the facility equipment remotely. The SCADA system is essential to ensure all project components are operating correctly. In order for the SCADA system to operate properly, communications regarding the energy facility equipment performance needs to be delivered via use of microwave dishes to an AT&T communication hub located approximately 7 miles to the east in

Fernley. Per an analysis performed by telecommunication experts with Dodge Flat Solar LLC and working with the communication hub in Fernley, it has been determined that a telecommunication tower at 90 feet in height is required in order to provide a direct line of sight between the Dodge Flat Solar Energy Center and telecommunication hub in Fernley. A direct line of sight is required to ensure reliable communications with minimal potential for obstructions that could impact the communication signals between the Dodge Flat Solar Energy Center and telecommunication hub in Fernley.

Prior to constructing the proposed telecommunication towers, Dodge Flat Solar LLC will demonstrate to Washoe County the facilities are in compliance with Federal Communications Commission (FCC) and Federal Aviation Administration (FAA) regulations.

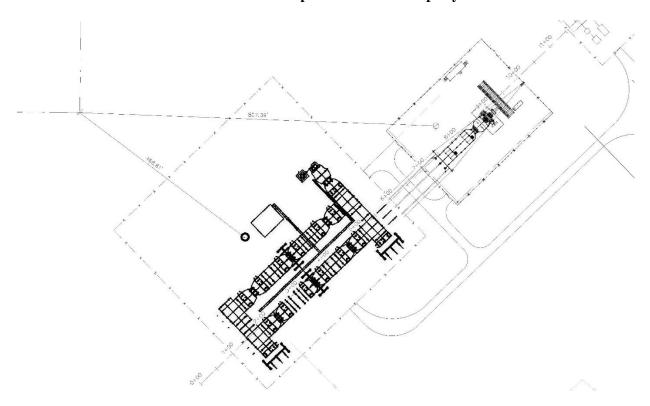
(3) Please provide distances from the nearest property line to each of the monopoles.

- Olinghouse Switching Station approx. 468 feet.
- Project Substation approx. 807 feet.

See Attachment A below.

(4) County Code requires commercial anti-climbing devices or security fencing for private antennas. Please clarify - is the general sub-station and switchyard fencing intended to meet this requirement, or is anything additional proposed?

• The perimeter of the Olinghouse Switching Station and Project Substation would be enclosed by a 6-foot-tall chain-link fence topped with a foot of three-strand barbed wire. No additional fencing is proposed around each telecommunication monopole as the poles would be located within the chain-link fenced area.



Attachment A Distances from Monopoles to Nearest Property Line