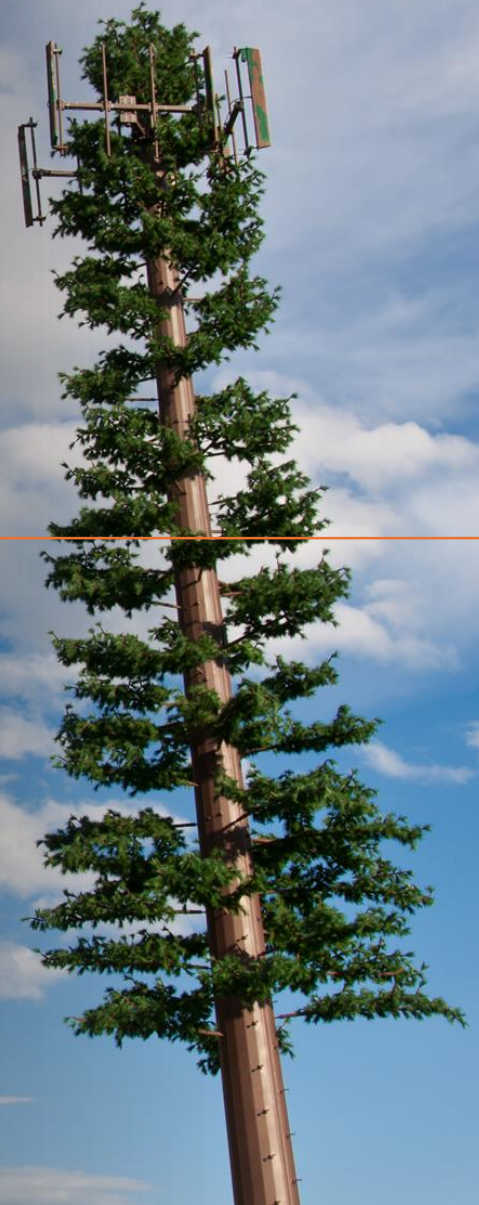


# No To Tower 23

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Permit: CUP23-0015



Point 1: YOUR AUTHORITY

# Your Authority Under The Telecommunications Act of 1996

1. Congress created this Act to give local governments authority over the placement and construction of these towers.

2. *Smart Planning Provisions*

# Point 2: EVIDENCE

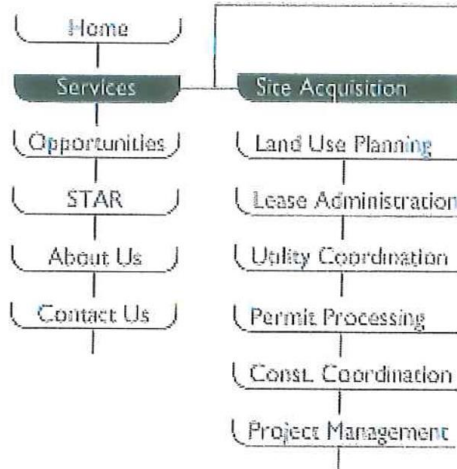
# WHO Applied For This Permit?

- *Sequoia Deployment Services, Inc.*



Login

SITE ACQUISITION · LAND USE PLANNING

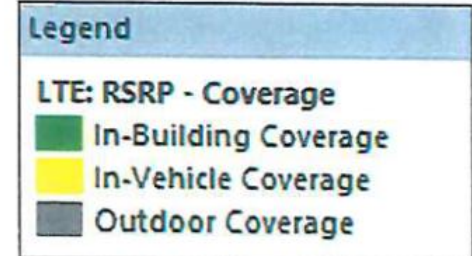
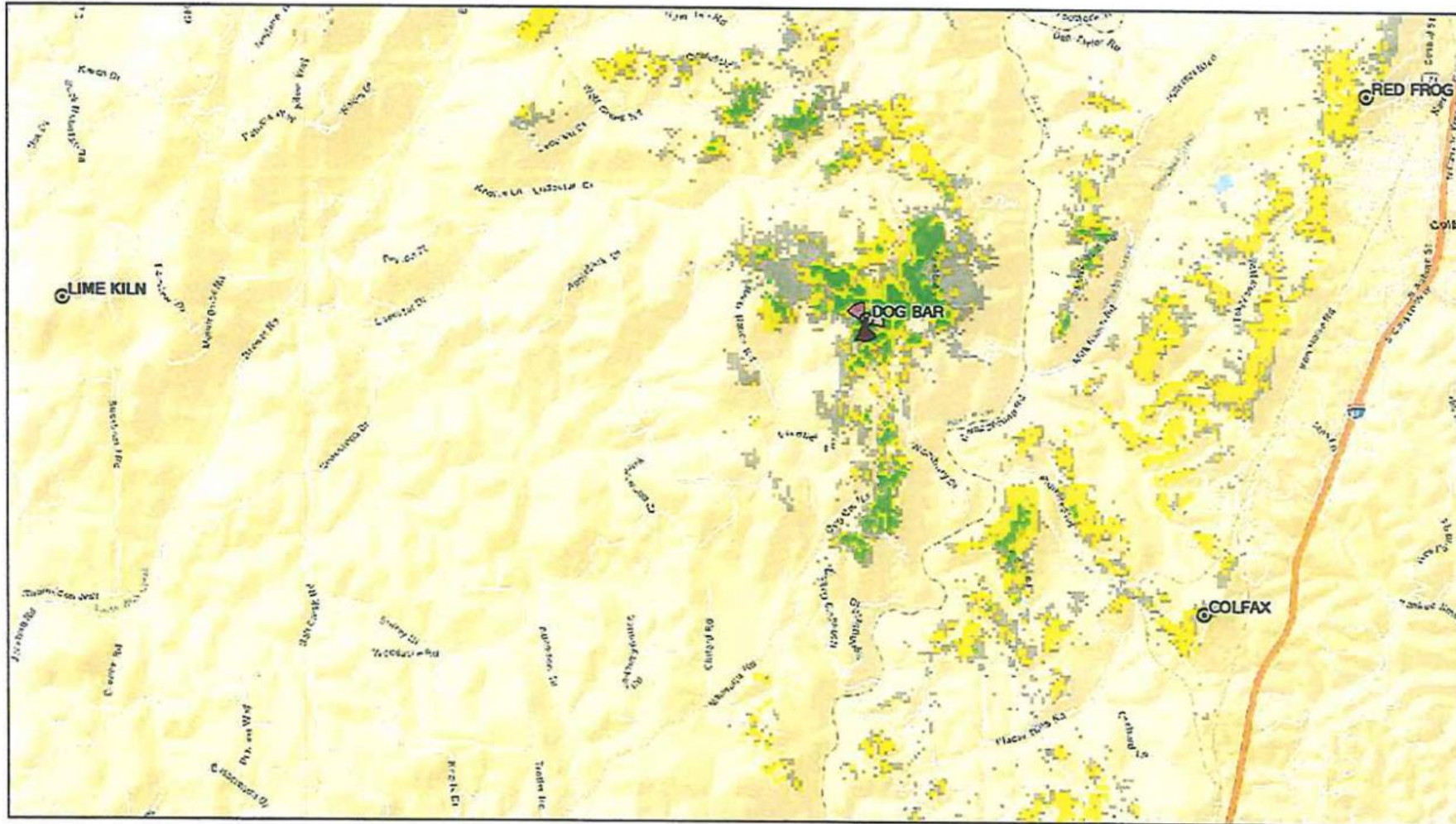


### Site Acquisition

Identify properties that are suitable for communications sites and negotiate leases with landowners.

Sequoia assumes responsibility for each assigned site and represents its clients in identifying properties for sites and negotiating leases with landowners.

# Dog Bar AWS Coverage Map



# LACK of HARD EVIDENCE

- The FCC's View on Propagation Maps
- *Verizon's* Coverage Maps
- *Verizon's* Multiple Frequencies



# Point 3: CODE VIOLATIONS

# **Granting This Application Violates Section L-II 3.8 of the Code for Multiple Reasons**

1. Sequoia's Visual Impact Images



**Figure 8 - Photo Simulation of proposed monopine looking southwest from Dog Bar Road**



PROPOSED MONOPINE



**Figure 10 - Photo Simulation of proposed monopine looking northwest from Dog Bar Road**

*Omnipoint Communications Inc. v. The City of White Plains, 430 F2d 529,  
The United States Court of Appeals*

“the Board was free to discount Omnipoint’s study because it was conducted in a defective manner. . . ***the observation points were limited to locations accessible to the public roads, and no observations were made from the residents’ backyards much less from their second story windows***” *Id.* Omnipoint Communications Inc. v. The City of White Plains, 430 F2d 529 (2nd Cir. 2005),

# **Additional Code Violations**

2. Substantial and Unnecessary Adverse Aesthetic Impacts Upon Nearby Homes

“Our home is the closest to the proposed tower site. To say that this massive 129-foot tower will be an eye sore is severely understated. In fact, it will be the only thing we see because it will be built about 100 feet from our property. If this happens, it will completely dwarf the other trees surrounding it and DOMINATE our entire view...If this goes through, it would be as if my entire family is living next to a prison.”



# Property Values and Public Safety

3. This Tower Would Substantially Devalue Adjacent Properties
4. Fall Zone Requirements and Related Hazards













**Deny Permit**  
**CUP23-0015**

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