



VISUAL ASSESSMENT



**KENNEBUNK
FACTORY PASTURE ROAD
KENNEBUNK, ME**

PREPARED FOR:



PREPARED BY:

**All-Points Technology Corporation, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385**

VISUAL ASSESSMENT

Wireless EDGE Towers ("Wireless EDGE") is seeking approval for the development of a new wireless communications facility (the "Facility") on a ± 1.39 -acre parcel located southwest of Factory Pasture Lane in Kennebunk, Maine (the "Host Property").¹ All-Points Technology Corporation, P.C. ("APT") completed this assessment to evaluate the potential visual effects of the proposed Facility from within a two-mile radius (the "Study Area"). The Study Area includes portions of the towns of Arundel to the northeast and Wells to the southwest.

Project Setting

A gravel access drive extends onto the Host Property from Factory Pasture Lane and a cleared area used for the storage of wooden utility poles is located on the northern portion of the Host Property. An overhead electrical transmission corridor and an underground water main both traverse the Host Property in generally a west-east direction. Remaining portions of the Host Property are wooded and undeveloped. The Facility would be located in the southeastern portion of the Host Property (the "Site") and accessed via a proposed gravel drive extending southeastward from the existing drive and utility pole storage area.

The surrounding area is characterized by a mix of residential development, commercial development, municipal infrastructure, recreation areas, and wooded land. The offices of the Kennebunk Sewer District abut the Host Property to the west and the Kennebunk Sewer District treatment plant is located approximately 650 feet southwest of the Site. Additional commercial development is located along Water Street west of the Host Property. Residential development is located north of the Site. The Mousam River Wildlife Sanctuary borders the Host Property to the southeast, the Kennebunk Skatepark is located ± 300 feet north of the Site, Rogers Pond Park and Boat Launch are located $\pm 1,000$ feet west-southwest of the Site, and Parsons Field is located $\pm 1,100$ feet north of the Site. The northern portion of the Rachel Carson National Wildlife Refuge is located in the southern portion of the Study Area with the closest portion of the refuge approximately 1.15 miles south of the Site.

Topography within the Study Area consists of gently rolling terrain. Ground elevations range from sea level along the banks of the Mousam River approximately 0.2 mile southwest of the Site to 171 feet above mean sea level ("AMSL") approximately 1.9 miles northwest of the Site. The Site is located at a ground elevation of approximately 15 feet AMSL. Tree cover (consisting of deciduous hardwoods and conifers) occupies approximately 6,239 acres ($\pm 78\%$) of the 8,042-acre Study Area, and open water covers an additional approximately 131 acres ($\pm 2\%$).

¹ The Host Property is owned by the Town of Kennebunk (the "Town") and has no numerical street address, but is identified by the Town as Map 52, Lot 44.

Sizeable waterbodies contributing to the open water area include Mousam River (± 86 acres) and Kennebunk River (± 40 acres).

Project Undertaking

Based on information contained in lease exhibits (dated March 16, 2025 prepared by Wireless EDGE), the Facility would include a 176-foot-tall steel, brown monopole tower enclosed within an irregularly-shaped, gravel-based, fenced compound. The Facility has been designed to accommodate multiple wireless service providers along with municipal equipment.

Methodology

APT used the combination of a predictive computer model, in-field analysis, and a review of various data sources to evaluate the visibility associated with the proposed Facility on both a quantitative and qualitative basis. The predictive model provides a measurable assessment of visibility throughout the entire Study Area, including private properties and other areas inaccessible for direct observations. The in-field analysis consisted of a balloon test and field reconnaissance of the Study Area to observe existing conditions, verify results of the model, inventory areas of visibility, and provide photographic documentation from publicly accessible areas. A description of the procedures used in the analysis is provided below.

Preliminary Computer Modeling

To conduct this assessment, a predictive computer model was developed specifically for this project using ESRI's ArcMap GIS² software and available GIS data. The predictive model incorporates Project- and Study Area-specific data, including the Site location, its ground elevation and the proposed Facility height, as well as the surrounding topography, existing vegetation, and structures (the primary features that can block direct lines of sight).

A digital surface model ("DSM"), capturing both the natural and built features on the Earth's surface, was generated for the extent of the Study Area utilizing Maine South 2020 LiDAR³ LAS⁴ data points. LiDAR is a remote-sensing technology that develops elevation data by measuring the time it takes for laser light to return from the surface to the instrument's sensors. The varying reflectivity of objects also means that the "returns" can be classified based on the characteristics of the reflected light, normally into categories such as "bare earth," "vegetation," "road," "surface water" or "building." Derived from the 2020 LiDAR data, the LAS datasets contain the corresponding elevation point data and return classification values. The Study Area

² ArcMap is a Geographic Information System desktop application developed by the Environmental Systems Research Institute for creating maps, performing spatial analysis, and managing geographic data.

³ Light Detection and Ranging

⁴ An LAS file is an industry-standard binary format for storing airborne LiDAR data.

DSM incorporates the first return LAS dataset values that are associated with the highest feature in the landscape, typically a treetop, top of a building, and/or the highest point of other tall structures.

Once the DSM was generated, ESRI's Viewshed Tool was utilized to identify locations within the Study Area where the proposed Facility may be visible. ESRI's Viewshed Tool predicts visibility by identifying those cells⁵ within the DSM that can be seen from an observer location. Cells where visibility was indicated were extracted and converted from a raster dataset to a polygon feature which was then overlaid onto aerial photograph and topographic base maps. Since the DSM includes the highest relative feature in the landscape, isolated "visible" cells are often indicated within heavily forested areas (e.g., from the top of the highest tree) or on building rooftops during the initial processing. It is recognized that these areas do not represent typical viewer locations and overstate visibility. As such, the resulting polygon feature is further refined by extracting those areas. The viewshed results are also cross-checked against the most current aerial photographs to assess whether significant changes (a new housing development, for example) have occurred since the time the LiDAR-based LAS datasets were captured.

The results of the preliminary analysis are intended to provide a representation of those areas where portions of the Facility may potentially be visible to the human eye without the aid of magnification, based on a viewer eye-height of five (5) feet above the ground and the combination of intervening topography, trees and other vegetation, and structures. However, the Facility may not necessarily be visible from all locations within those areas identified by the predictive model, which has its limitations. For instance, the computer model cannot account for mass density, tree diameters and branching variability of trees, or the degradation of views that occurs with distance. As a result, some areas depicted on the Viewshed Analysis maps as theoretically offering potential visibility of the Facility may be over-predictive because the quality of those views is not sufficient for the human eye to recognize the Facility or discriminate it from other surrounding or intervening objects.

Seasonal Visibility

Visibility also varies seasonally with increased, albeit obstructed, views occurring during "leaf-off" conditions. Beyond the variabilities associated with density of woodland stands found within any given Study Area, each individual tree also has its own unique trunk, pole timber and branching patterns that provide varying degrees of screening in leafless conditions which, as introduced above, cannot be precisely modeled. Seasonal visibility is therefore estimated based on a combination of factors including the type, size, and density of trees within a given area; topographic constraints; and other visual obstructions that may be present. Considering these

⁵ Each DSM cell size is 1 square meter.

dynamics, areas depicting seasonal visibility on the Viewshed Analysis maps are intended to represent locations from where there is a potential for views through intervening trees, as opposed to indicating that leaf-off views will exist from within an entire seasonally shaded area.

Balloon Test and Field Reconnaissance

To supplement the results of the computer modeling efforts, APT completed in-field verification activities on April 24, 2025 consisting of a balloon test, vehicular and pedestrian reconnaissance, and photo-documentation. A tethered brightly-colored (red) ±4-foot diameter balloon was positioned at the Site directly above the center of the proposed monopole. APT conducted a Study Area reconnaissance by driving publicly accessible locations to inventory where the balloon could, and could not, be seen. Visual observations from the reconnaissance were used to evaluate the results of the preliminary visibility mapping, including identifying any overt discrepancies in the initial modeling, and to obtain photo-documentation from representative locations within the Study Area.

Photographic Documentation and Simulations

Photographs were taken with a Canon EOS 6D digital camera body⁶ and Canon EF 24 to 105 millimeter ("mm") zoom lens. The coordinates of the proposed monopole location were entered as a "waypoint" into a handheld global positioning system ("GPS") device, with the "find" tool on the GPS unit then used to provide the distance and orientation to the Site. The geographic coordinates of each photo location were recorded as meta data using GPS technology internal to the camera.

APT typically uses a standard focal length of 50 mm to present a consistent field of view. When appropriate, photos are taken at lower focal lengths to provide a greater depth of field and to provide context to the scene by including surrounding features within the photograph. During this evaluation, six (6) photographs were taken at a 35 mm focal length and four (4) were taken at 24 mm.

Photographic simulations were generated to portray scaled renderings of the Facility from twelve (12) locations presented herein where the monopole will be recognizable above or through the trees. Using field data, Site plan information and 3-dimensional (3D) modeling software, spatially referenced models of the Site and Facility were generated and merged. The geographic coordinates obtained in the field for the photograph locations were incorporated into the model to produce virtual camera positions within the spatial 3D model. Photo-simulations were created by combining a 3D-generated rendering with a corresponding "existing conditions"

⁶ The Canon EOS 6D is a full-framed camera which includes a lens receptor of the same size as the film used in 35 mm cameras. As such, the images produced are comparable to those taken with a conventional 35 mm camera.

photo and merging the two using Adobe Photoshop image editing software. The resulting “proposed conditions” image provides the viewer with an accurate representation of the Facility’s visual impact by ensuring consistency in scale, perspective, and alignment between the photograph and the 3D model. This is achieved by matching focal length, camera angle, and geographic reference points, allowing for a precise overlay of the rendered elements onto the real-world imagery.

For presentation purposes in this report, the photographs were produced in an approximate 6.75-inch by 10-inch format. Reproducing the images in this format size presents sufficiently large views while also providing key contextual landscape elements (existing developments, street signs, utility poles, etc.) so that the viewer can interpret the proportionate scale of each object within the scene. Photo-documentation of the field reconnaissance and photo-simulations of the proposed Facility are presented in the attachments at the end of this report. The field reconnaissance photos that include the balloon in the view provide visual reference points for the approximate height and location of the proposed Facility relative to the scene. The corresponding photo-simulations depict post-Project development conditions with the monopole and antenna infrastructure. The photo-simulations are intended to provide the reader with a general understanding of the different view characteristics associated with the Facility from various locations. Photographs were taken from publicly accessible areas and unobstructed view lines were chosen wherever possible.

Each photograph and simulation location, view orientation and distance relative to the Site, and the general characteristics of the view are summarized in the attachments to this report. A photolog depicting the location of each photograph, corresponding photo-simulations, and viewshed maps are also provided in the attachments.

Final Visibility Mapping

Information obtained during the field reconnaissance was incorporated into the mapping data layers, including observations, the photograph locations, areas that experienced recent land use changes and those places where the initial model was found to over or under-predict visibility. Once the additional data was integrated into the model, APT recalculated the visibility of the proposed Facility within the Study Area.

Conclusions

The majority of year-round visibility occurs over commercially developed properties along Water Street west of the Site (see photos 2, 3, and 4) and over the open areas of the Kennebunk Sewer District treatment plant south of the Site (see photo 1). Additional year-round views extend to select locations along Factory Pasture Road east of the Site (see photo 12) and

northwest of the Site (see photo 13). More-distant year-round views extend northward approximately 0.27 mile from the Site (see photo 8) and northwestward approximately 0.41 mile from the Site (see photo 7). Spot views of the Facility extend onto the northern portion of the Mousam River Wildlife Sanctuary located to the southeast. The views are seasonal and highly obscured. Based upon the computer model and in-field reconnaissance no views of the Facility are anticipated from the aforementioned Rachel Carson National Wildlife Refuge south of the Site.

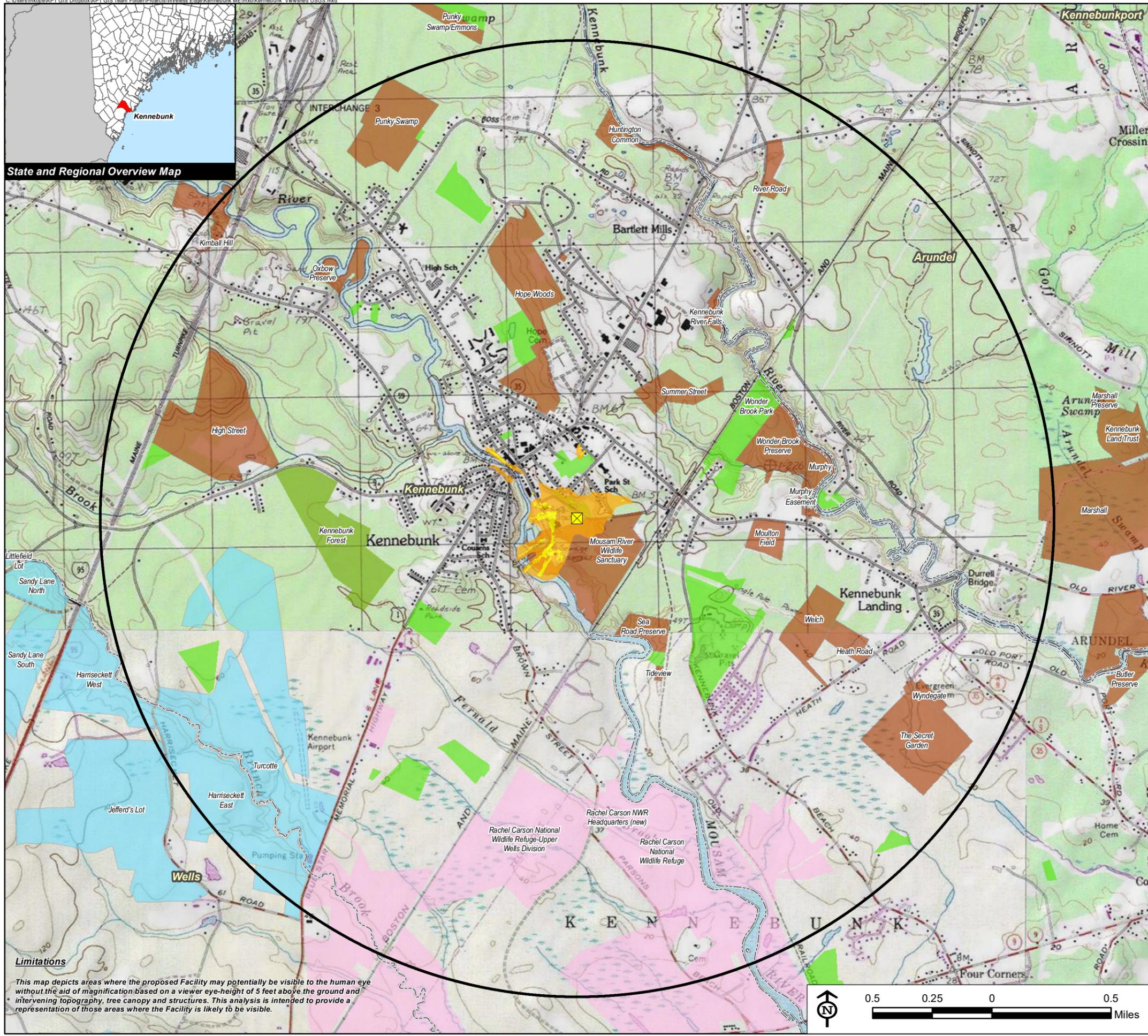
Year-round visibility associated with the Facility is predicted to cover ± 8 acres. Seasonal visibility, when leaves are off the deciduous trees, is predicted to extend over an additional ± 56 acres and generally surrounds/extends those areas where year-round views will occur. The combined ± 64 acres of predicted visibility represents less than one percent ($\pm 0.8\%$) of the 8,042-acre Study Area. The dense tree cover and rolling terrain aid in minimizing the visibility associated with the proposed Facility.

Limitations

The Viewshed Analysis maps presented in the attachments to this report depict areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of five (5) feet above the ground and intervening topography, tree canopy, and structures. This analysis may not account for all visible locations, as it is based on the combination of computer modeling, incorporating aerial photographs, and in-field observations from publicly accessible locations. This analysis does not claim to depict the only areas, or all locations, where visibility may occur; it is intended to provide a representation of those areas where the Facility is likely to be seen.

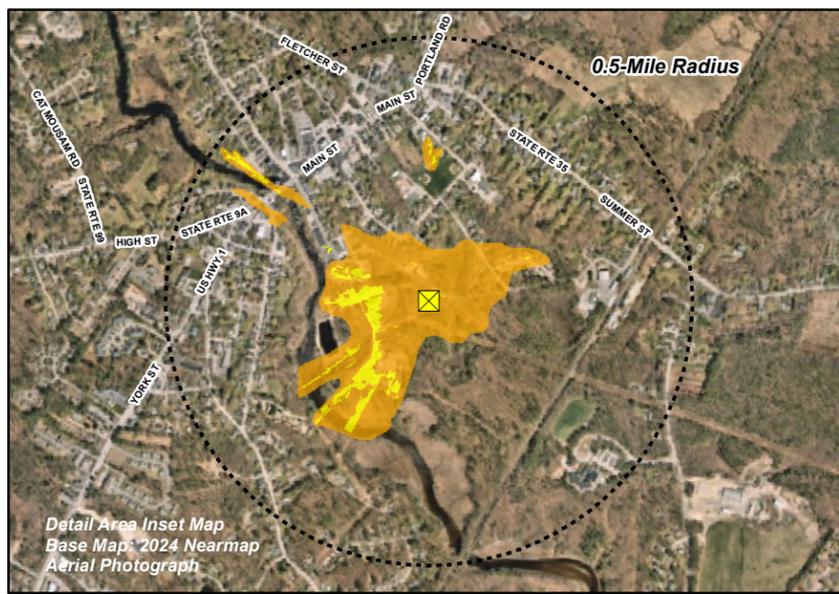
The photo-simulations provide a representation of the Facility under similar settings as those encountered during the field review and reconnaissance. Views of the Facility can change throughout the seasons and the time of day, and are dependent on weather and other atmospheric conditions (e.g., haze, fog, clouds); the location, angle, and intensity of the sun; and the specific viewer location. Weather conditions on the day of the field review included clear skies.

ATTACHMENTS



State and Regional Overview Map

Limitations
 This map depicts areas where the proposed Facility may potentially be visible to the human eye without the aid of magnification based on a viewer eye-height of 5 feet above the ground and intervening topography, tree canopy and structures. This analysis is intended to provide a representation of those areas where the Facility is likely to be visible.



Detail Area Inset Map
 Base Map: 2024 Nearmap
 Aerial Photograph

Viewshed Analysis Map

Proposed WirelessTelecommunications Facility Factory Pasture Lane Kennebunk, Maine

Proposed facility height is 176 feet AGL.
 Forest canopy height is derived from LIDAR data.
 Study area encompasses a two-mile radius and includes 8,042 acres.
 Existing conditions field verified by APT on April 24, 2025
 Base Map Source: USGS 7.5 Minute Topographic
 Quadrangle Map, Biddeford, ME (1975), Kennebunk, ME (1983),
 Kennebunkport, ME (1979), and Wells, ME (1983)
 Map Date: June 2025

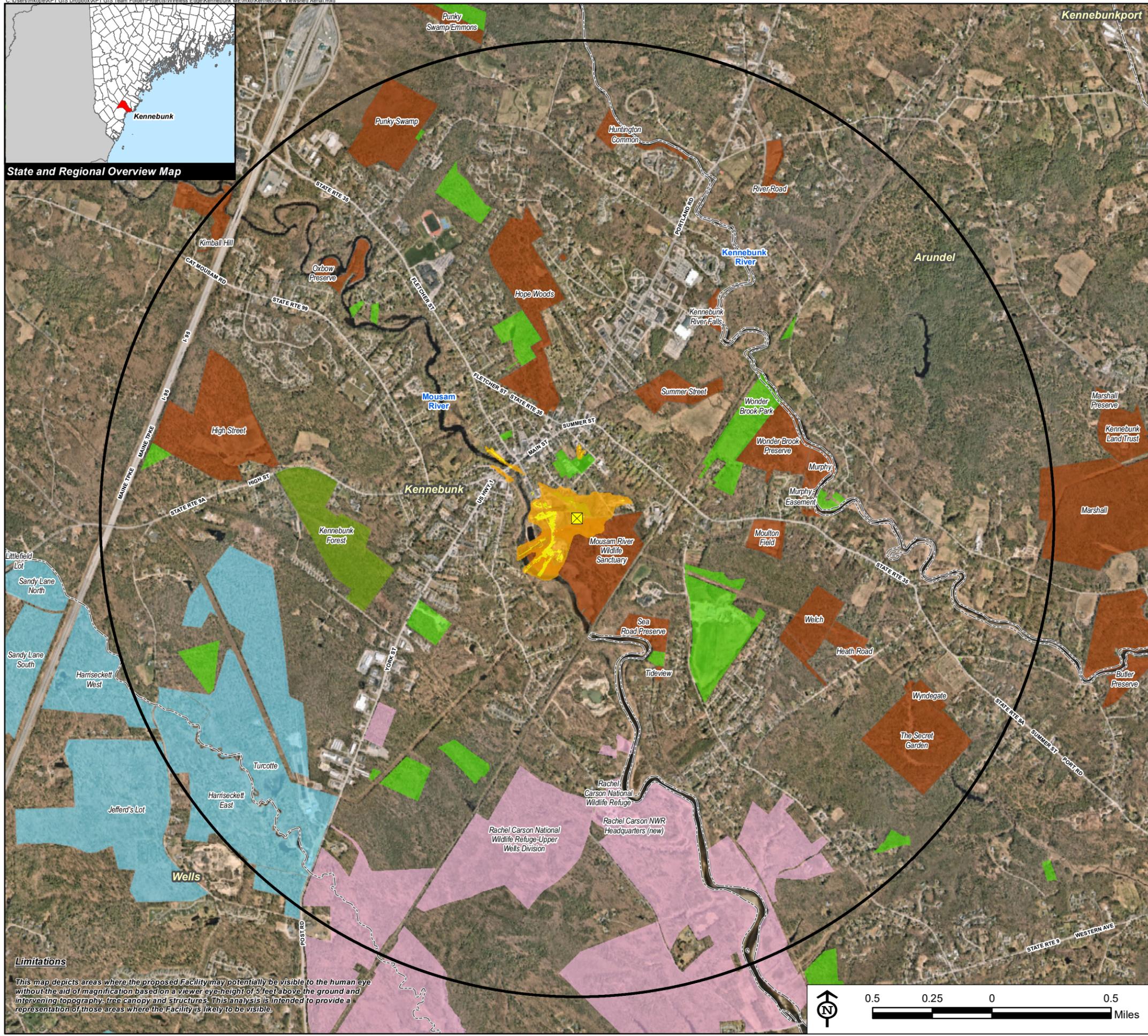
Legend

- Proposed Site
- Study Area (2-Mile Radius)
- Areas of Potential Seasonal Visibility (56 Acres)
- Predicted Year-Round Visibility (8 Acres)
- Municipal Boundary
- Conserved Lands**
- Federal
- Municipal
- Other
- Private
- State

Data Sources:

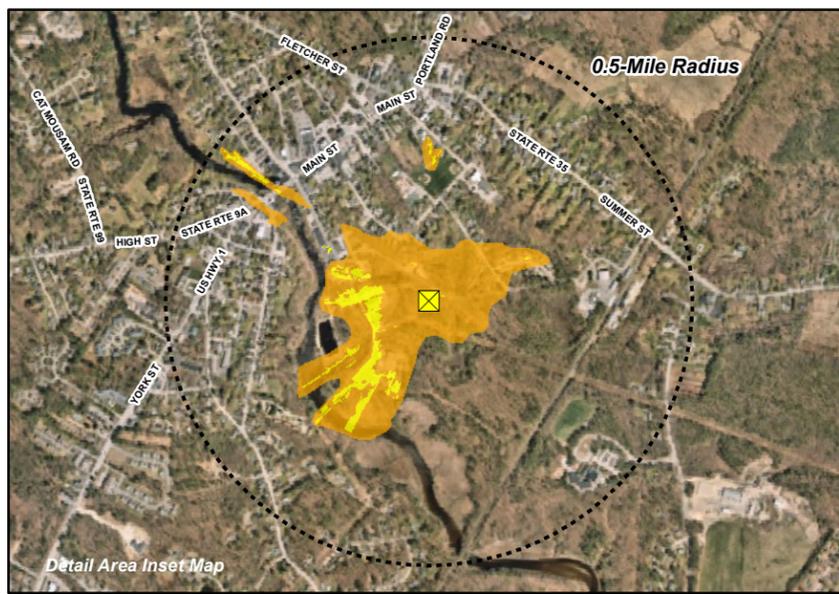
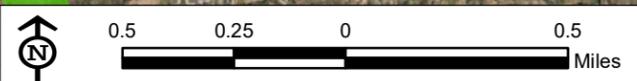
Physical Geography / Background Data
 A digital surface model (DSM) was created from the Maine South 2020 LIDAR LAS data points (NOAA). The DSM captures the natural and built features on the Earth's surface.
 Other data sources obtained from Maine Office of GIS





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 Factory Pasture Lane
 Kennebunk, Maine

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 Study area encompasses a two-mile radius and includes 8,042 acres.
 Existing conditions field verified by APT on April 24, 2025
 Base Map Source: 2024 Nearmap Aerial Photograph
 Map Date: June 2025

Legend

- Proposed Site
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Other data sources obtained from Maine Office of GIS

Photo Locations

Photo	Location	Orientation	Distance	Visibility
1	KENNEBUNK SEWER DISTRICT TREATMENT PLANT*	NE	+/- 0.17 MILE	YEAR ROUND
2	WATER STREET*	E	+/- 0.12 MILE	YEAR ROUND
3	WATER STREET	ESE	+/- 0.17 MILE	YEAR ROUND
4	WATER STREET	ESE	+/- 0.22 MILE	YEAR ROUND
5	WATER STREET	SE	+/- 0.31 MILE	SEASONAL
6	WATER STREET	SE	+/- 0.34 MILE	NOT VISIBLE
7	DUFFY'S TAVERN AND GRILL PARKING LOT	SE	+/- 0.41 MILE	YEAR ROUND
8	PARSONS FIELD	S	+/- 0.27 MILE	YEAR ROUND
9	WINTER STREET	SW	+/- 0.13 MILE	SEASONAL
10	HALEYS WOODS LANE	WSW	+/- 0.19 MILE	SEASONAL
11	WINTER STREET	W	+/- 0.21 MILE	NOT VISIBLE
12	FACTORY PASTURE LANE**	W	+/- 385 FEET	YEAR ROUND
13	KENNEBUNK SKATE PARK**	SSE	+/- 390 FEET	YEAR ROUND
14	FACTORY PASTURE LANE*	SE	+/- 0.13 MILE	SEASONAL
15	PINEWOOD ROAD*	NW	+/- 0.97 MILE	NOT VISIBLE
16	QUEST FITNESS PARKING LOT	SSW	+/- 0.83 MILE	NOT VISIBLE
17	FLETCHER STREET*	SE	+/- 0.90 MILE	NOT VISIBLE
18	BROWN STREET*	ENE	+/- 0.38 MILE	NOT VISIBLE
19	MOUSAM LANDING ROAD**	NE	+/- 0.32 MILE	NOT VISIBLE
20	BROWN STREET AT MOUSAM RIDGE ROAD**	NNE	+/- 0.57 MILE	NOT VISIBLE

* Photograph was taken at 35 mm focal length.

** Photograph was taken at 24 mm focal length.

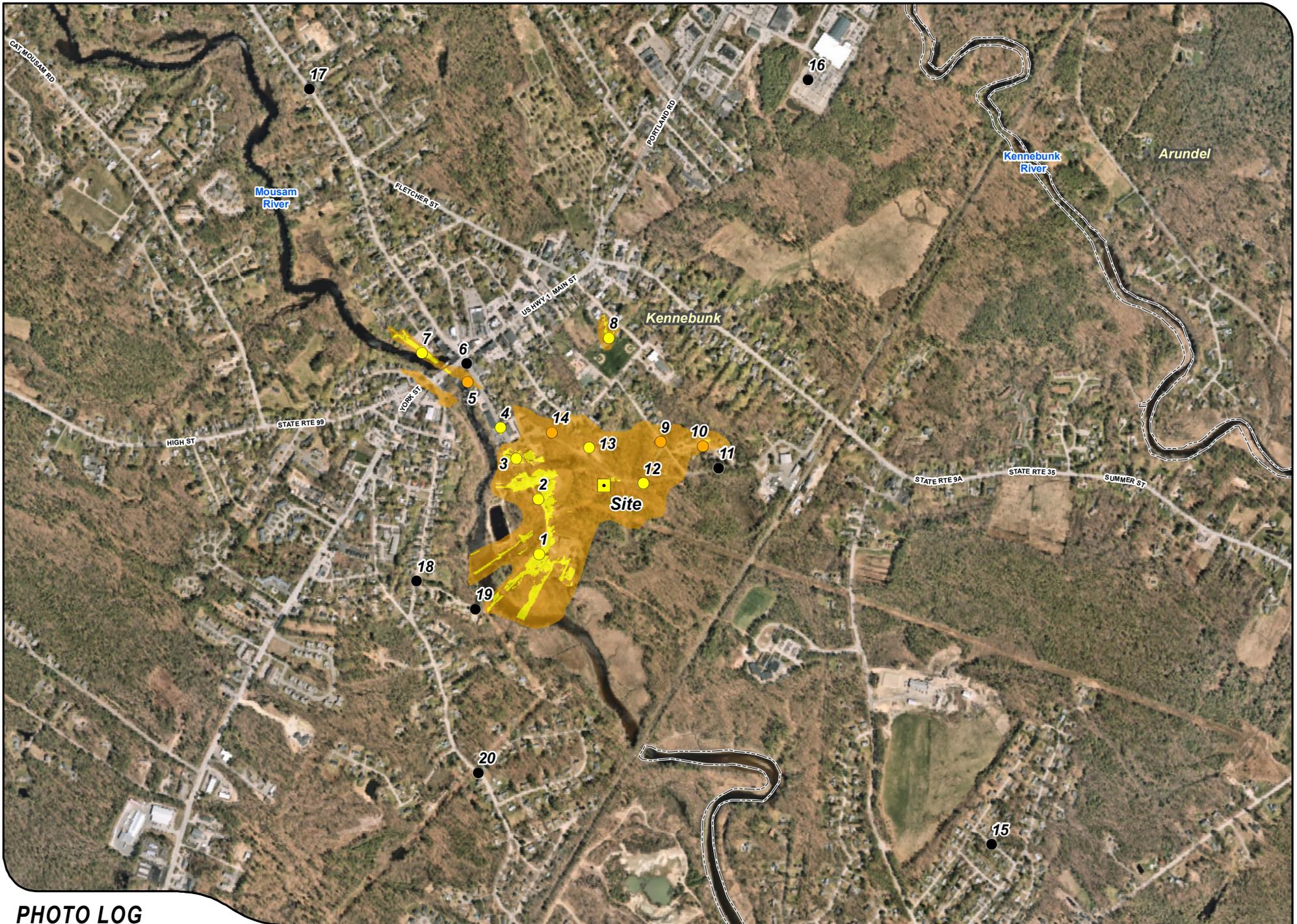
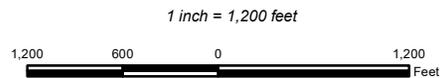


PHOTO LOG

- Legend
- Site
 - Seasonal
 - Year-Round
 - Not Visible
 - *Areas of Potential Seasonal Visibility
 - *Predicted Year-Round Visibility
 - Municipal Boundary

*Visibility layers obtained from viewshed analysis mapping contained in this document



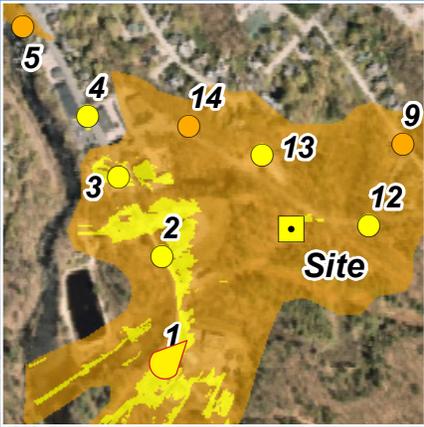


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	KENNEBUNK SEWER DISTRICT TREATMENT PLANT	NE	+/- 0.17 MILE	YEAR ROUND

PHOTOGRAPHED ON 4/24/2025 35mm focal length

PROPOSED



PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
1	KENNEBUNK SEWER DISTRICT TREATMENT PLANT	NE	+/- 0.17 MILE	YEAR ROUND

EXISTING

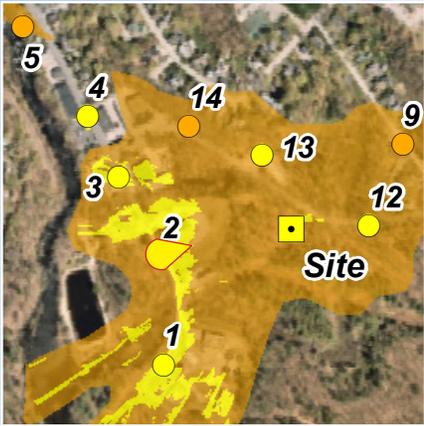


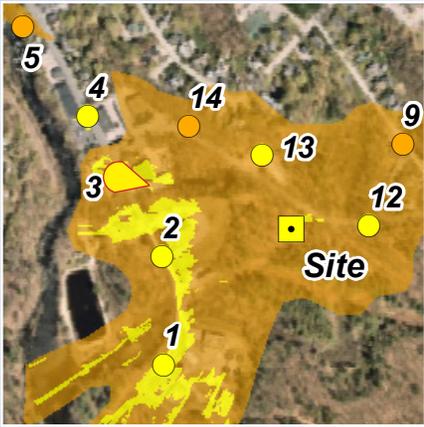
PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	WATER STREET	E	+/- 0.12 MILE	YEAR ROUND

PHOTOGRAPHED ON 4/24/2025 35mm focal length



PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
2	WATER STREET	E	+/- 0.12 MILE	YEAR ROUND

EXISTING



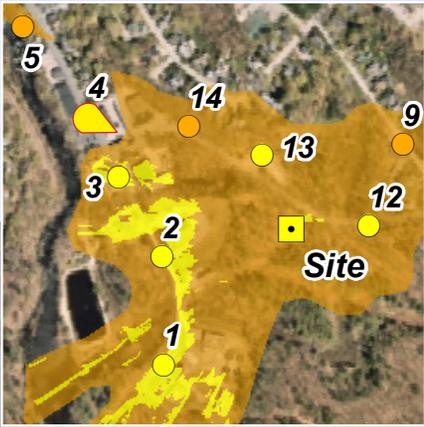
PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
3	WATER STREET	ESE	+/- 0.17 MILE	YEAR ROUND



PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
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EXISTING



PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
4	WATER STREET	ESE	+/- 0.22 MILE	YEAR ROUND

PROPOSED



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EXISTING

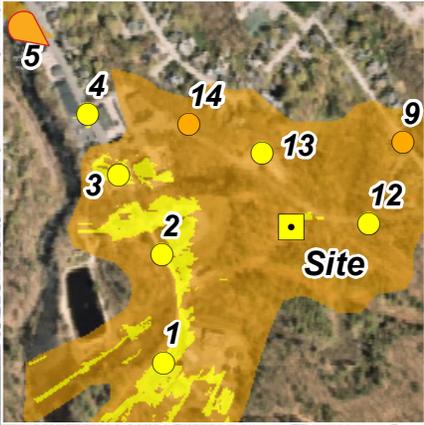


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
5	WATER STREET	SE	+/- 0.31 MILE	SEASONAL

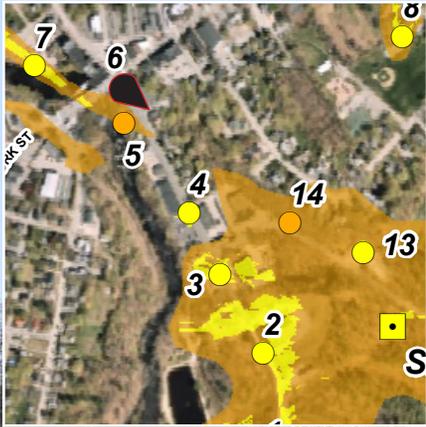
PHOTOGRAPHED ON 4/24/2025

PROPOSED



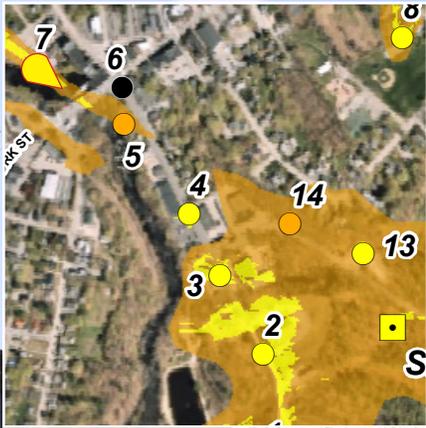
PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
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EXISTING



PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
6	WATER STREET	SE	+/- 0.34 MILE	NOT VISIBLE



PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
7	DUFFY'S TAVERN AND GRILL PARKING LOT	SE	+/- 0.41 MILE	YEAR ROUND



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EXISTING

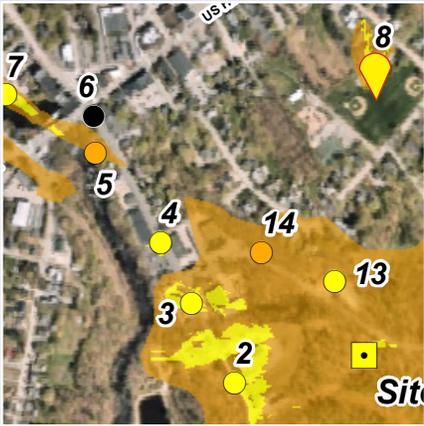


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
8	PARSONS FIELD	S	+/- 0.27 MILE	YEAR ROUND

PHOTOGRAPHED ON 4/24/2025

PROPOSED



PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
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EXISTING



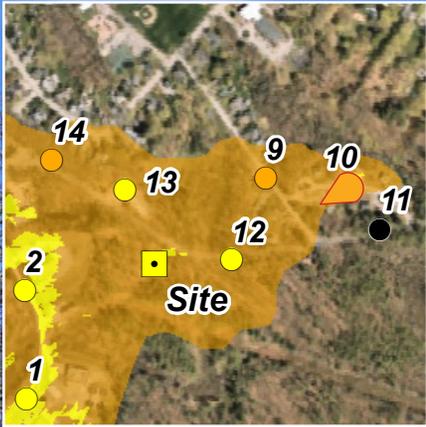
PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
9	WINTER STREET	SW	+/- 0.13 MILE	SEASONAL

PROPOSED



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PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
11	WINTER STREET	W	+/- 0.21 MILE	NOT VISIBLE

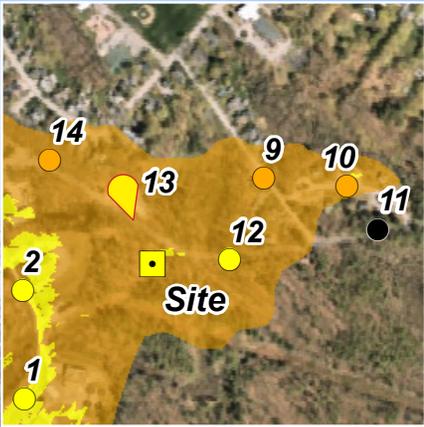


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
12	FACTORY PASTURE LANE	W	+/- 385 FEET	YEAR ROUND

PHOTOGRAPHED ON 4/24/2025
24mm focal length



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PHOTOGRAPHED ON 4/24/2025
24mm focal length

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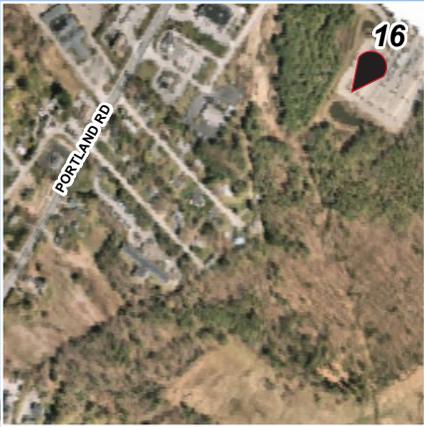
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EXISTING



PHOTOGRAPHED ON 4/24/2025
35mm focal length

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
15	PINEWOOD ROAD	NW	+/- 0.97 MILE	NOT VISIBLE



PHOTOGRAPHED ON 4/24/2025

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
16	QUEST FITNESS PARKING LOT	SSW	+/- 0.83 MILE	NOT VISIBLE

EXISTING

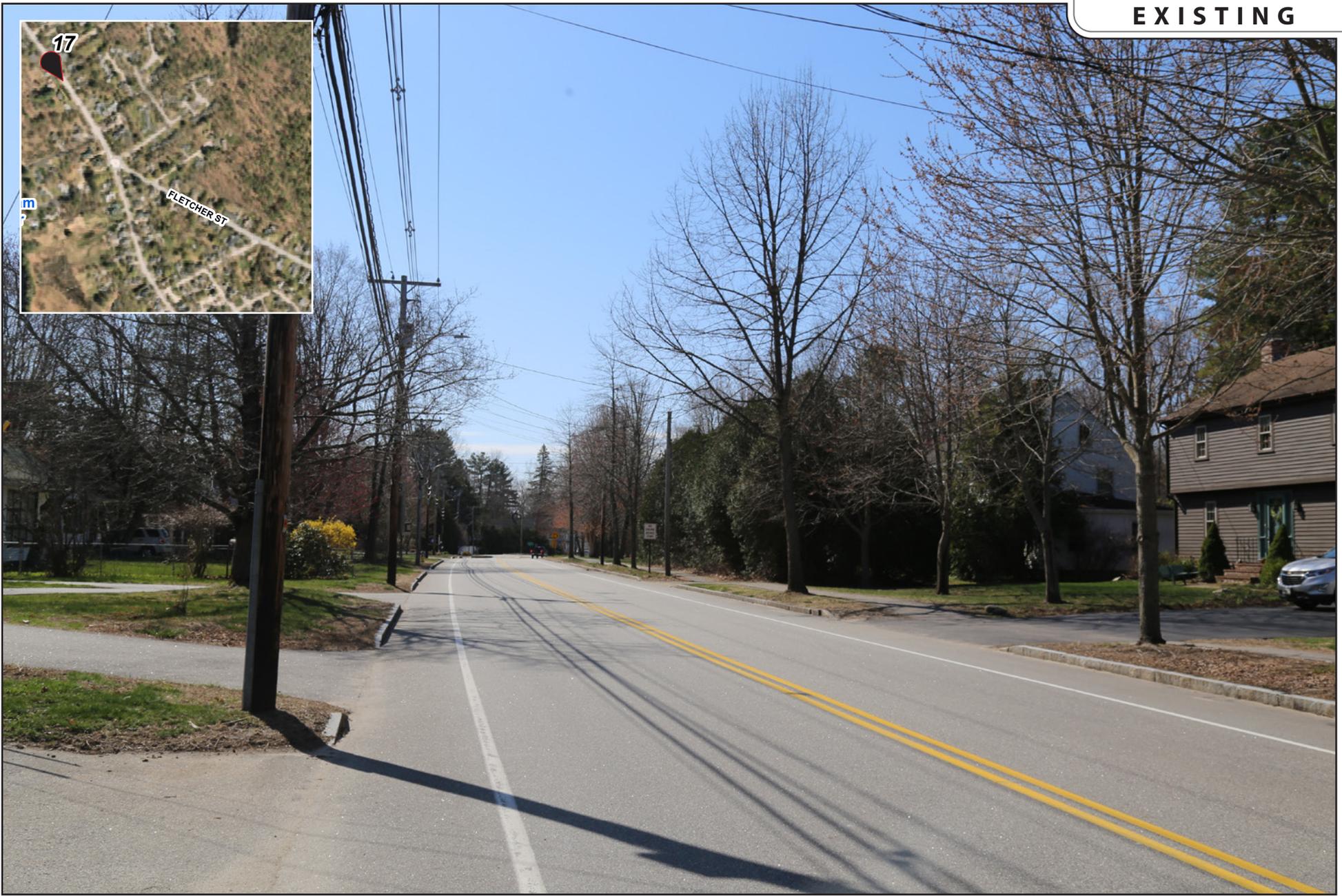


PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
17	FLETCHER STREET	SE	+/- 0.90 MILE	NOT VISIBLE

PHOTOGRAPHED ON 4/24/2025 35mm focal length

EXISTING



PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
18	BROWN STREET	ENE	+/- 0.38 MILE	NOT VISIBLE

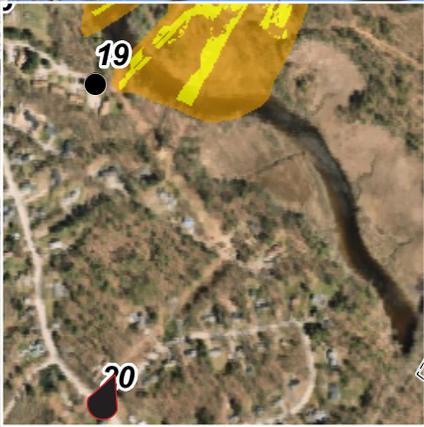
PHOTOGRAPHED ON 4/24/2025 35mm focal length

EXISTING



PHOTOGRAPHED ON 4/24/2025
24mm focal length

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
19	MOUSAM LANDING STREET	NE	+/- 0.32 MILE	NOT VISIBLE



PHOTOGRAPHED ON 4/24/2025
24mm focal length

PHOTO	LOCATION	ORIENTATION	DISTANCE TO SITE	VISIBILITY
20	BROWN STREET AT MOUSAM RIDGE ROAD	NNE	+/- 0.57 MILE	NOT VISIBLE