

BEFORE THE COUNTY OF HAWAII
PLANNING COMMISSION

In the matter of the Contested Case Hearing) SPP No. 02-005
of)
)
AMERICAN TOWER CORPORATION) HEARINGS OFFICERS' PROPOSED
Request: Allow for a 180-foot) FINDINGS OF FACT, CONCLUSIONS OF
telecommunication lattice tower, antennas,) LAW, DECISION AND ORDER
accessory equipment building and accessory)
structures on a 10,000 square foot portion of)
2.5419 acre parcel of land; land zoned)
Agricultural (AG-3a) and situated in the)
State Land Use Agricultural District Tax)
Map Key: 3-9-2-197: Portion of 001)
_____)

**HEARINGS OFFICERS' PROPOSED FINDINGS OF FACT,
CONCLUSIONS OF LAW, DECISION AND ORDER**

Pursuant to the authorization of the Planning Commission, three members of the Planning Commission and its counsel Ivan Torigoe, presided over a contested case hearing on the application for a special permit by American Tower Corporation on May 10, 2002. In attendance were American Tower Corporation, represented by its counsel Lissa H. Andrews, Intervenors Anita and Erich Broennimann, and Representative for Intervenors, Lawrence Ford, and the County of Hawaii Planning Department represented by its counsel Deputy Corporation Counsel Patricia K. O'Toole. The Hearings Officers, pursuant to the Planning Commission's instructions, having considered the parties' evidence of record and arguments, hereby submit their proposed findings of fact, conclusions of law, decision and order in the above-entitled matter.

01598

I. FINDINGS OF FACT

A. Procedural Background

1. On January 15, 2002, American Tower Corporation filed an application for a special permit under Chapter 205, Hawaii Revised Statutes (HRS), with the County of Hawaii Planning Department, to establish a 180-foot telecommunication lattice tower with antennas, and related equipment buildings and accessory structures on a 10,000 square foot portion of a 2.5419 acre parcel zoned Agricultural (A-3a) and situated in the State Land Use Agricultural District.

The proposed telecommunication facility will consist of the following:

- a. 180-foot tall, self-supporting lattice tower able to accommodate at least five (5) wireless communication carriers and their appurtenant equipment;
- b. the ability, without further approval from the Planning Commission, to accommodate a variety of antennas such as omni, panel and microwave dish antennas and coaxial cabling;
- c. space within the 10,000 square foot project site to accommodate the various equipment shelters and cabinets for each carrier;
- d. equipment cabinets; and
- e. equipment shelters.

(County Ex. A, pp. 1-2; American Tower Ex. A-20.)

2. The subject property is located in the Hawaiian Ocean View Ranchos Subdivision-Increment 3, to the west (makai) and southwest corner of the Mamalahoa Highway and Kohala Boulevard intersection, Kahuku, K`au, Hawai`i, TMK: (3) 9-2-197: Portion of 1.

(County Ex. A, p. 1; American Tower Ex. A-20.)

01599

3. The Planning Commission held a public hearing on the subject application on April 5, 2002, at the Ohana Keauhou Beach Resort, Kahalu`u Ballroom, 78-6740 Ali`i Drive, North Kona, County and State of Hawai`i.

4. At the public hearing, the Planning Commission considered the petition of Intervenors Anita and Erich Broennimann, to intervene as parties and their request for standing in a contested case hearing under Rule 4 of the Planning Commission.

5. After consideration of the Intervenors' petition on April 5, 2002, the Planning Commission voted to admit the Intervenors as parties to the proceeding and to conduct the proceeding on the subject application in the manner provided by Chapter 91, HRS, and Rule 4 of the Planning Commission (contested case hearing).

6. At the April 5, 2002 public hearing, the Planning Commission decided that Chairwoman Geraldine Giffin and Commissioners Grant Togashi, Hannah Springer and Florence Kubota would serve as hearing officers and they set the contested case hearing and site inspection for May 10, 2002. (4/05 TR. 33.)

7. Intervenors, through their Representative, Lawrence Ford, filed their Statement of Issues, List of Witnesses and List of Exhibits on April 19, 2002.

8. The applicant, through its counsel, Lissa H. Andrews, filed its Statement of Issues, List of Witnesses and List of Exhibits on April 19, 2002.

9. The Planning Department filed its Statement of Issues, List of Witnesses and List of Exhibits on April 19, 2002.

10. A site inspection was conducted on May 10, 2002 at the subject property, as well as various points from which the tower could be seen, including Intervenors Anita and Erich Broennimann's property and a point on the State highway, as well as at a parcel of property four parcels to the west of the subject property. (5/10 TR. 1.)

11. A public hearing and contested case hearing was held on May 10, 2002 at Ocean View Community Center, 92-8924 Leilani Circle, Ocean View, Ka'u, County and State of Hawai'i before Commissioners Geraldine Giffin, Hannah Springer and Florence Kubota. Chairwoman Geraldine Giffin presided over the hearing. Commissioner Grant Togashi was absent and excused.

B. Substantive Facts

12. The subject property is approximately 2.542 acres in size and located within the Hawaiian Ocean View Ranchos Subdivision on the makai side of the Mamalahoa Highway on the corner of Kohala Boulevard. It is situated approximately six miles from the nearest shoreline. There is a .4582-acre easement to HELCO on the northeast corner of the subject property for a future substation. This easement, and a large caved-in lava tube on the western end of the property significantly limit the use of the property. The 10,000 square foot (100 feet by 100 feet) project site is situated immediately makai (south) of the HELCO easement at about 15 feet from its boundary along Kohala Boulevard. (County Ex. A, pp. 3-4; American Tower Ex. A-20.)

13. Properties situated on the makai side of the Mamalahoa Highway are 3.0 acres in size, similar to the subject property with a zoning of A-3a. Properties to the north on the opposite side of the Mamalahoa Highway are primarily 1 acre in size and zoned A-1a by the

County. Surrounding lands are either vacant or developed intermittently for residential purposes. (County Ex. A, p. 4; American Tower Ex. A-20.)

14. Intervenors Anita and Erich Broennimann live at 92-8449 King Kamehameha Boulevard, north of the subject property. The Broennimann property is located approximately a quarter mile from the proposed site, with at least ten (10) parcels between the Broennimann property and the proposed site. (5/10 TR. 49.) The Broennimanns' claim that the tower will cause permanent loss of natural resources, including natural beauty, view planes, aesthetic values and open spaces.

15. The landowner of the subject property is the Hawaiian Ranchos Road Maintenance Corporation (HRRMC), a non-profit corporation composed of all owners who own lots within the Hawaiian Ranchos Subdivision, Increments 1, 2 and 3. The applicant American Tower Corporation has a letter of authorization from the HRRMC to file its Special Permit Application. (County Ex. A, p. 1; American Tower Ex. A-20, p. 3 [Ex. B].)

16. The Planning Commission approved the issuance of Special Permit No. 1057 to HRRMC on May 19, 2000, to allow the establishment of a base yard on the subject property for the purpose of stockpiling materials and storage of equipment and supplies for road maintenance purposes. (County Ex. A, p. 1.)

17. The subject property has not been classified under the ALISH system. (County Ex. A, p.4; American Tower Ex. A-20, p. 10.)

18. The area of the proposed use is in Zone "X", areas outside the 500-year flood plain. (County Ex. A, p. 4; American Tower Ex. A-20, p. 11.)

01602

19. The Land Study Bureau's Detailed Land Classification identifies the soil of the subject property as a soil type of Aa clinkers, E-258, or "very poor". (County Ex. A, p. 4; American Tower Ex. A-20, p. 10.)

20. The United States Department of Agriculture Soil Survey classifies the soil as rLV-Lava flows Aa. This lava has almost no soil covering and is rough and broken. It is bare of vegetation except for mosses, lichens, ferns and a few small ohia trees. (County Ex. A, p. 4; American Tower Ex. A-20, p. 10.)

21. The proposed 180-foot tall self-supporting lattice tower will be capable of co-locating at least five (5) wireless communication carriers including all their necessary omni, panel and microwave dish antennas and coaxial cabling. There is space within the 10,000 square foot project site to accommodate the various equipment shelters and cabinets for each carrier. A 7-foot high chain link fence topped with barbed wire will surround the 10,000 square foot project site. (American Tower Ex. A-20, pp. 4-5.)

22. Applicant proposed the lattice tower due to several different factors. A lattice structure is better positioned for co-location, which allows for the placement of more carriers on one structure, eliminating the need for numerous structures in the area. From a distance, a lattice tower also blends in better with the horizon than a monopole. A tower also allows for better antenna separation on a vertical and horizontal level. It is also easier to modify a lattice structure to accommodate the weight and wind loading of additional antenna equipment. (Written Testimony of Keoni Fox; American Tower Ex. A-20, p. 5; 5/10 TR. 40-41.)

23. The applicant researched the coverage requirements and needs of the community in determining where to best place the tower. Applicant's first client on the tower, AT&T Wireless Services (AT&T), conducted propagation studies to determine the sites that

would provide adequate coverage to the Hawaiian Ocean View Estates area. Henry Oshiro, a radio frequency engineer for AT&T, testified that approximately 70% of Hawaiian Ocean View Estates is without cellular telephone coverage because cellular telephone signals from the closest antennas to Hawaiian Ocean View Estates do not propagate into the area because of distance and area geography. Currently, there are three (3) existing cellular telephone sites in the southern Ka'u area - one in the South Kona District, known as the "Mac Nut Farms Site", another in the Ka'u District, known as the "South Point Site" and another at the top of the Hawaiian Ocean View Estates subdivision, known as the "Ocean View Repeater Site". Mr. Oshiro's propagation study showed a coverage "hole" in the Hawaiian Ocean View Estates area. (Written Testimony of Henry Oshiro; American Tower Ex. A-23; 5/10 TR. 51-62.)

24. Mr. Oshiro determined that a minimum 180-foot tower height was necessary to provide seamless cellular telephone coverage between the Mac Nut Farms Site and the South Point Site, and that the proposed tower would allow for cellular telephone coverage to cover the gap between those two sites, allowing for cellular telephone coverage of over 95% of the Hawaiian Ocean View Estates area. Mr. Oshiro also determined that decreasing the height of antennas at the proposed site would result in a degradation of cellular service and coverage of the area and will create gaps in coverage between cellular telephone sites. (Written Testimony of Henry Oshiro, American Tower, Ex. A-15; 5/10 TR. 51-62.)

25. To determine the location of the site for placement of the proposed tower, American Tower Corporation's radio frequency engineer developed a search ring of approximately ½ mile in diameter. Sites within the search ring will allow the site to fit within the existing network of tower sites. Sites selected outside of the search ring will not work as well. The search ring does not take into account other factors which affect site selection process

such as power and phone line availability, property size, property zoning, and willingness of a landowner to commit to a long-term lease. (Written Testimony of Keoni Fox and Exs. A-1 through A-15 and A-22 through A-24; 5/10 TR. 43-49; American Tower Exhibit A-20.)

26. The proposed site within the search ring was chosen by American Tower Corporation after consultation and meetings with the community. Keoni Fox, American Tower Corporation's representative, met with the Ocean View Estates Board of Directors (Board) on October 25, 2001 for feedback on a possible location within the search ring. A representative of the HRRMC suggested the Ranchos Road Maintenance Baseyard. This property was suggested as a good location for the site based on two reasons. One, the property already has a special permit to be used for an industrial purpose. Second, the mauka corner of the property is designated to be a future HELCO substation site, which substation will be located between the proposed tower and the Mamalahoa Highway. (Written Testimony of Keoni Fox, Exs. A-1 through A-15 and A-22 through A-24; 5/10 TR. 43-49; American Tower Ex. A-20.)

27. Mr. Fox met with the Board again on December 27, 2001 and made a presentation at the Ocean View Town Meeting on February 24, 2002 to obtain feedback on the proposed site. Based on the feedback obtained from the community, and the fact that the site is presently being used as a road base yard and is adjacent to a proposed HELCO substation, American Tower Corporation decided to seek a special permit to develop a 180-foot lattice tower on the site. (Id.)

28. Conventional land line telephone services are not available in approximately 1/3rd of the Hawaiian Ocean View Estates area. (Written Testimony of Keoni Fox.) Testimony was received establishing the dire need for better telephone communications in the area for medical emergencies and protection and general safety of the community.

01605

Telephone communications made possible by the proposed tower will facilitate the provision of emergency services in the area. (Written Testimony of Bob Barry; Written Testimony of Patti Barry, Exs. A-19, A-26; Written Testimony of Don Nitsche; Written Testimony of Martie Jean Nitsche; Written Testimony of Virgil Stuck; Written Testimony of Elinor Yocum; Written Testimony of Keoni Fox; American Tower Ex. A-21; public testimony in the record.)

29. Access is available to the site via Kohala Boulevard. (February 5, 2002 Memorandum from Department of Transportation (DOT) and Applicant's Response to DOT, dated March 4, 2002.)

30. The proposed tower is a low maintenance facility and will not generate traffic that will adversely affect the area. The tower is not continuously staffed, except for periodic maintenance and repair. (County Ex. A, p.2; American Tower Ex. A-20, p. 9.)

31. The subject property is designated as Extensive Agricultural on the Land Use Pattern Allocation Guide Map. The General Plan document does not list the subject property nor the immediate area as being an example of Natural Beauty. (County Ex. A, p. 3; American Tower Ex. A-20; p. 11.)

32. The subject property is not situated within the Special Management Area and is located in excess of six (6) miles from the nearest shoreline. (County Ex. A, p. 3; American Tower Ex. A-20.)

33. There are no archaeological or historic sites on the property. A field inspection was conducted by Bob Rechtman, PH.D. of Rechtman Consulting in January 2002, who reported that no surface archaeological features were found and the investigation concludes that the construction of the proposed lattice tower within the project site "will not have a direct

1606

adverse impact upon historic properties.” (County Ex. A, p. 4; American Tower Ex. A-20, p. 11.)

34. There are no known valued cultural, historical or native resources within the project site nor has any traditional and customary native Hawaiian rights been practiced in the area. (County Ex. A, p. 4; American Tower Ex. A-20, p.11.) No endangered species or flora or fauna are known to exist within the project site. A flora and fauna survey was conducted by Ron Terry, Ph.D. and Patrick Hart, Ph.D. on January 3, 2002. Two individuals of the endangered halapepe were located in one area on the balance of the subject property. This area will not be impacted by the proposed site. The plants will be fenced during construction to insure that no inadvertent damage occurs to the plants or their habitat. (American Tower Ex. A-20, p. 11.)

35. The lattice tower with antennas will be visible from the Mamalahoa Highway fronting the project site as well as from the immediately surrounding area within the Hawaiian Ocean View Ranchos and Hawaiian Ocean View Estates subdivisions. (County Ex. A, p. 5.)

36. American Tower provided evidence that a lattice tower is better able to blend into its surroundings than a monopole structure. (Written Testimony of Keoni Fox; American Tower Ex. A-20, p.5.)

37. A stealth tower is not a feasible option because it does not offer the height needed to service Hawaiian Ocean View Estates area. (Written Testimony of Keoni Fox; 5/10 TR. 40.)

38. It would take three or four shorter towers to provide the service of the 180-foot tower. (5/10 TR. 39.)

39. Testimony was received that some members of the public find the visual impact of the tower to be significant and negative and others do not.

40. Intervenors stated their belief that the location of the tower would diminish their property value. Yukio Takeya, a realtor expert for American Tower Corporation, provided testimony that cellular communication towers did not diminish the value of properties adjacent to towers located in Pepeekeo and Waiakea Uka. (Written Testimony of Yukio Takeya; Ex. A-25; 5/10 TR. 30.)

41. The operation of the tower will not generate noise or dust. There may be minimal noise and dust during the construction period, but this can be minimized with proper construction techniques, dust control and limiting construction to day light hours. (County Ex. A, p. 5; American Tower Ex. A-20, p. 17.)

42. The operation of the radio antennas will not present health hazards or cause interference with other electronic appliances and equipment. The cellular radio antenna operates at an ultra-high frequency radio wave band between 800-900 megahertz. The pattern of the antenna is directed towards the horizon and not downward, therefore, the radio frequencies near the base of the tower is minimal. Reviews of scientific literature by the Environmental Protection Agency (EPA), the National Institute of Occupational Safety and Health (NIOSH), the American national Standards Institute (ANSI) and the National Council on Radiation Protection and Measurements (NCRP) have been conducted by the applicant. None of these agencies have identified harmful health effects associated with low power densities and the ultra-high frequency of the cellular radio wave transmissions. The tower was designed to comply with the Federal Communication Commission's (FCC) guidelines. (County Ex. A, p. 5; American Tower Ex. A-20, pp. 16-17.)

43. The Telecommunications Act of 1996, Section 704, which amended portions of the 1934 Act, prohibits local authorities from regulating the placement of cellular towers based on environmental effects, more specifically radio frequency emissions, as long as those towers comply with the FCC's guidelines. (County Ex. A, p. 5.)

44. Water is not required for the proposed use. (County Ex. A, p. 6; American Tower Ex. A-20, p. 9.)

45. No sewage will be disposed of on the property. (County Ex. A, p. 6; American Tower Ex. A-20, p. 9.)

46. Electrical and telephone services are available to the site. (County Ex. A, p. 6.)

47. Police, fire and emergency services are available within the Ocean View area. (County Ex. A, p. 6.)

48. The tower will not interfere with the police department's radio or microwave frequencies. (American Tower Ex. A-20, p. 17.)

II. CONCLUSIONS OF LAW

1. The special permit process established by the State legislature under Section 205-6, HRS, is a conditional use system which authorizes the Planning commission (where the affected area is less than 15 acres in area) to issue special permits for the establishment of certain uses in the State Land Use Agricultural District.

2. Under Section 205-6, HRS, the Planning Commission may issue a special permit for a use that the Planning Commission finds is unusual and reasonable.

3. By its own Rule 6, the Planning Commission established decision criteria for determining whether a proposed use meets the unusual and reasonable standard of Section 205-6, HRS.

4. The proposed use would promote the effectiveness and objectives of Chapter 205, HRS, as amended. The State Land Use Law and Regulations are intended to preserve, protect and encourage the development of lands for those uses to which they are best suited in the interest of the public welfare of the people of the State of Hawai'i. In the case of the Agricultural District, the intent is to preserve or keep lands of high agricultural potential in agricultural use.

5. The desired use will not unreasonably burden public agencies to provide roads and streets, sewers, water, drainage, school improvements, police and fire protection.

6. Unusual conditions, trends and needs have arisen since the district boundaries and regulations were established.

7. The lands upon which the proposed use is sought is unsuited for the uses permitted in the district.

8. The use will not substantially alter or change the essential character of the land and the present use.

9. The proposed use is not contrary to the General Plan and other documents such as design plans. The proposed request would complement and be consistent with, among others, the following goals, policies and standards of the General Plan:

Land Use Element

- Designate and allocate land uses in appropriate proportions and in keeping with the social, cultural and physical environments of the County.

01610

- The County shall encourage the development and maintenance of communities meeting the needs of its residents in balance with the physical and social environment.

Economic Element

- Provide residents with opportunities to improve their quality of life.
- County shall provide an economic environment which allows new, expanded, or improved economic opportunities that are compatible with the County's natural and social environment.

Public Utilities

- Ensure that adequate, efficient and dependable public utility services will be available to users.
- Provide utilities and service facilities which minimize total cost to the public and effectively service the needs of the community.

10. The desired use will not adversely affect the surrounding properties.

III. DECISION AND ORDER

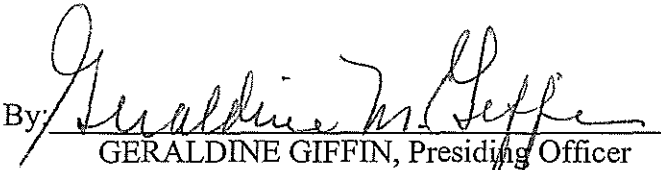
Based on the foregoing Findings of Fact and Conclusions of Law, the Hearings Officers recommend that the application of American Tower Corporation, for a Special Permit to allow the applicant to construct the following, be approved by the Planning Commission:

- a. 180-foot tall, self-supporting lattice tower able to accommodate at least five (5) wireless communication carriers and their appurtenant equipment;
- b. the ability, without further approval from the Planning Commission, to accommodate a variety of antennas such as omni, panel and microwave dish antennas and coaxial cabling;
- c. space within the 10,000 square foot project site to accommodate the various equipment shelters and cabinets for each carrier;
- d. equipment cabinets; and
- e. equipment shelters.

01611

Provided however, that the applicant shall be responsible to observe and comply with the conditions of approval affixed hereto and which, by this reference, are incorporated herein and made a part of the Special Permit granted to the applicant. This favorable recommendation does not, however, sanction specific plans submitted with the application as they may be subject to change given code and regulatory requirements of the affected agencies.

DATED: Hilo, Hawaii, JUN 13 2002

By: 
GERALDINE GIFFIN, Presiding Officer

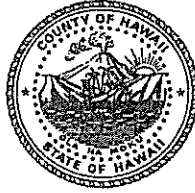
CONDITIONS OF APPROVAL
Special Permit Application No. 02-005
American Tower Corporation

1. The applicant, successors or assigns shall comply with all of the stated conditions of approval.
2. Final plan approval for the proposed tower and antennas and related improvements shall be secured from the Planning Director in accordance with the Sections 25-2-72, 25-2-74 and 25-4-12 of the Zoning Code.
3. Within 120 days of the permanent abandonment of the tower, the applicant shall remove the tower and its antenna and accessory structures (including the prefabricated communication equipment building, propane gas tank, generator and fence), down to, but not including, the concrete foundation. The applicant shall provide written notification to the Planning Director of such removal.
4. A written statement with a copy to the Police Department that the proposed tower development shall not interfere with the County of Hawai'i Public Safety Radio System.
5. Co-location or expansion of the tower and related facilities shall be allowed within the parameters of the tower height and envelope as approved by the Planning Commission.
6. Comply with all applicable rules, regulations and requirements of the affected agencies for the development of the subject property, including Federal Aviation Administration and Federal Communications Commission.
7. Upon compliance with applicable conditions of approval, the applicant shall submit a status report, in writing, to the Planning Director.
8. Should any remains of historic sites, such as rock walls, terraces, platforms, marine shell concentrations or human burials be encountered, work in the immediate area shall cease and the Department of Land and Natural Resources Historic Preservation Division (DLNR-HPD) shall be immediately notified. Subsequent work shall proceed upon an archaeological clearance from the DLNR-HPD when it finds that sufficient mitigative measures have been taken.
9. An extension of time for the performance of conditions of the permit may be granted by the Planning Director upon the following circumstances:
 - a) Non-performance is the result of conditions that could not have been foreseen or are beyond the control of the applicant, successors or assigns, and that are not the result of their fault or negligence.

- b) Granting of the time extension would not be contrary to the General Plan or the Zoning Code.
- c) Granting of the extension of time would not be contrary to the original reasons for the granting of the permit.
- d) The time extension granted shall be for a period not to exceed the period originally granted for performance (i.e., a condition to be performed within one year may be extended for up to one additional year).

01614

Harry Kim
Mayor



Christopher J. Yuen
Director

Roy R. Takemoto
Deputy Director

County of Hawaii

PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043
(808) 961-8288 • Fax (808) 961-8742

September 4, 2003

Ms. Elizabeth Hill
National Zoning Manager
American Tower Corporation
1705 Mendel Court
Fayetteville, NC 28304

Dear Ms. Hill:

**Revocation of Special Permit No. 1171 (formerly SPP No. 02-005)
American Tower Corporation
TMK: (3) 9-2-197: portion of 1**

Thank you for providing us with your new mailing address. An earlier attempt to contact you by mail was unsuccessful.

As requested in your letter of July 1, 2003, Special Permit No. 1171, which allowed the establishment of a telecommunication tower and related improvements, is hereby revoked. Thank you for informing us that American Tower Corporation will not proceed with the construction of the tower and related improvements.

Should you require assistance in the future, please feel free to contact us again.

Sincerely,

CHRISTOPHER J. YUEN
Planning Director

NH:pak

P:\wpwin60\norm\letters\hill liz spp 1171 9-4-03

041145
#37141
SEP 5 2003

Ms. Elizabeth Hill
National Zoning Manager
American Tower Corporation
Page 2
September 4, 2003

cc: Planning Commission
Patricia O'Toole, Deputy Corporation Counsel
Robert Kim, Esq.
Lissa H. Andrews, Esq.
Bob Jacobson, Councilman



Elizabeth A. Hill
Post Office Box 31085
Savannah, Georgia 31410
(912) 897-5965 fax
(912) 507-4676 mobile
Liz.Hill@americantower.com

2003 JUL 7 PM 2 23

PLANNING DEPARTMENT
COUNTY OF HAWAII

July 1, 2003

Planning Commission of the County of Hawaii
25 Aupuni Street, Romm 109
Hilo, Hawaii 96720

VIA FACSIMILE AND REGULAR MAIL

RE: SPP No. 02-005 ; AMERICAN TOWER CORPORATION
Request: Allow for a 180-foot telecommunication lattice tower, antennas, accessory equipment building and accessory structures on a 10,000 square foot portion of 2.5419 acre parcel of land; land zoned Agricultural (AG-3a) and situated in the State Land Use Agricultural District Tax Map Key: 3-9-2-197: Portion of 001

To Whom It May Concern:

American Tower requests revocation of the Special Permit granted in the above referenced case. If you have any questions, please feel free to call me at (912) 507-4676 or email me at liz.hill@americantower.com

Sincerely,

A handwritten signature in cursive script that reads 'Ea Hill'.

Elizabeth A. Hill
National Zoning Manager

Cc: Robert Kim, Esq.

13-114