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KANE COUNTY DEVELOPMENT DEPARTMENT
Zoning Division, Kane County Government Center
719 Batavia Avenue
Geneva, Illinois 60134
Office (630) 444-1236 Fax: (630) 232-3411

Received Date

**APPLICATION FOR ZONING MAP AMENDMENT
AND/OR SPECIAL USE**

Instructions:

To request a map amendment (rezoning) for a property, complete this application and submit it with all required attachments to the Subdivision and Zoning Division.

When the application is complete, we will begin the review process.

The information you provide must be complete and accurate. If you have a question please call the subdivision and zoning division, and we will be happy to assist you.

1. Property Information:	Parcel Number (s): 11-31-100-009
	Street Address (or common location if no address is assigned): 0 Lorang Road, Elburn, IL 60119 (Lorang Road at Seavey Road)

2. Applicant Information:	Name Jonathan Roberts (Soltage, LLC)	Phone 515-537-6738
	Address 66 York Street, 5th Floor	Fax
	Jersey City, NJ 07302	Email jroberts@soltage.com

3. Owner of record information:	Name Timothy P. Slamans	Phone 630-844-2484
	Address 44W029 Hazel Crest	Fax
	Sugar Grove, IL 60554-9696	Email tim@lindoo.net

Zoning and Use Information:

2040 Plan Land Use Designation of the property: Resource Management

Current zoning of the property: F - Farming District

Current use of the property: Agricultural - cultivated row crops

Proposed zoning of the property: F - Farming District

Proposed use of the property: Construction & operation of a 2 Megawatt ground mounted solar energy farm

If the proposed Map Amendment is approved, what improvements or construction is planned? (An accurate site plan may be required)

Construction of a 2 Megawatt ground mounted solar energy farm, including gravel service road, metal pile foundations,

solar panel system array, underground electric cables and poles, security fencing and gate, landscape shrub screening.

Attachment Checklist

- Plat of Survey prepared by an Illinois Registered Land Surveyor.
- Legal description
- Completed Land Use Opinion application (Available in pdf form at www.kanedupageswed.org/luo.pdf), as required by state law, mailed to: The Kane Dupage Soil and Water Conservation District, 545 S. Randall Road, St. Charles, IL 60174.
- Endangered Species Consultation Agency Action Report (available in pdf form at www.dnr.state.il.us/orep/nrrc/aar.htm) to be filed with the Illinois Department of Natural Resources.
- List of record owners of all property adjacent & adjoining to subject property
- Trust Disclosure (If applicable)
- Findings of Fact Sheet
- Application fee (make check payable to Kane County Development Department)

I (we) certify that this application and the documents submitted with it are true and correct to the best of my (our) knowledge and belief.

Tim Slawick
Record Owner

7-30-18
Date

Jonathan Roberts
Applicant or Authorized Agent

7-18-18
Date

Findings of Fact Sheet – Map Amendment and/or Special Use

- *The Kane County Zoning Board is required to make findings of fact when considering a rezoning. (map amendment)*
- *You should “make your case” by explaining specifically how your proposed rezoning relates to each of the following factors.*

Soltage IL Devco LLC
Name of Development/Applicant

July 18, 2018
Date

1. How does your proposed use relate to the existing uses of property within the general area of the property in question?

The general area is rural and the subject property is currently used for farming. Most of the surrounding properties are currently used for farming or other agricultural purposes but there is a Kane County DOT maintenance facility across Seavey Road and a Quickcrete plant nearby. The temporary nature of this solar facility will have no detrimental effects to the property or environment and will allow the property to be returned to productive agricultural use following decommissioning of the site.

2. What are the zoning classifications of properties in the general area of the property in question?

North, West and South: Zoned (F) Farming District

East: Zoned (B-3) Business District and (SU) Other

3. How does the suitability of the property in question relate to the uses permitted under the existing zoning classification?

The property is zoned as a farming district and has typically been used for crop farming. The proposed solar energy farm is consistent with this use and zoning because electricity is produced rather than a crop. Only a portion of the property to be leased will be utilized for solar energy. The remainder of the property will continue to be used for farming.

4. What is the trend of development, if any, in the general area of the property in question?

The development trend in the general area appears to be toward industrial uses, given the Kane County Division of Transportation maintenance facility located nearby and the Quickcrete concrete mixing plant located just a mile north along Lorang Road.

5. How does the projected use of the property, relate to the Kane County 2040 Land Use Plan?

The proposed solar energy farm is consistent with the 2040 Land Use Plan which indicates Resource Management for this area. Solar energy is a clean and renewable resource that will help conserve other forms of energy. Further, the temporary nature of this facility will allow the property to be returned to productive agricultural use following decommissioning of the site and the vegetative ground cover will conserve water and prevent soil erosion.

Findings of Fact Sheet – Special Use



Proposed Solar Energy Farm
Special Use Request

July 18, 2018
Date

- *The Kane County Zoning Board is required to make findings of fact when considering a special use.*
- *Special Uses shall be considered at a public hearing before the Zoning Board of Appeals. In its report of findings of facts, recommendations shall be made to the County Board following the public hearing. The Zoning Board **will not** recommend a special use **unless** the following items are addressed:*

6. Explain how the establishment, maintenance or operation of the special use will not be detrimental to or endanger the public health, safety, morals, comfort or general welfare.
The proposed solar farm will not cause any detrimental effects to the property or the neighborhood given the temporary nature of the facility; no hazardous materials are used or generated by the facility; it produces virtually no sound; it will be set back from view from the road and adjacent homes; the solar panel array has a low profile; landscape shrubbery screening will be installed for an aesthetically pleasing view; and, the facility will be surrounded by security fencing.

7. Explain how the special use will not be injurious to the use, enjoyment and value of other property in the immediate vicinity.
The low profile of the solar array and the landscape shrubbery screening along Lorang Road and Seavey Road will maintain the pleasing appearance of the neighborhood. The facility generates very little sound and only a few maintenance vehicles will visit the site for periodic maintenance as needed, thus preserving the use, enjoyment and value of the nearby properties.

8. Explain how the special use will not impede the normal, orderly development and improvement of the surrounding property.
The proposed Solar Farm will be a good neighbor because it is clean, quiet, shielded from view by the landscape screening, and does not generate any traffic.

9. Will adequate utility, access roads, drainage and other necessary facilities be provided?
Please explain:

Adequate power and communication utilities already exist at this location for ready access to the site. The solar panel system will be interconnected with the existing ComEd aerial power lines. A gravel driveway will be installed for access to the facility from Lorang Road. Site grading will be minimal and existing drainage patterns will be maintained. Culverts will be installed as needed; and, existing farm tiles will be maintained or relocated as needed to avoid conflicts.

10. Will adequate measures be provided for ingress and egress so designed to minimize the traffic and congestion? Please explain:

The proposed Solar Farm will not generate any traffic nor cause any congestion, as only a few maintenance vehicles will visit the site for periodic maintenance as needed and will easily be accommodated by the proposed access road.

Therefore, additional measures for ingress and egress are not warranted.

11. Will the special use conform to the regulations of the district in which it is located? Please explain:

Yes, the proposed Solar Farm will conform to the regulations of the F District - Farming in which it will be located. The facility will conform with setback restrictions for fences and hedges, type and height of fencing, signing and all other applicable restrictions of the Kane County Zoning Ordinance.

November 28, 2018

Diamond Street Partnership
Special Use in the F-Farming District for a commercial solar-electric (photovoltaic) system

Special Information: The petitioner is requesting a Special Use for a commercial 2 Megawatt solar-electric system. The facility would be located at the southeast corner of Lorang and Seavey Roads and be comprised of a solar panel array, security fencing and a maintenance drive off Lorang Road. No buildings are proposed and the remaining property would continue to be farmed.

Analysis: The Kane County 2040 Land Resource Management Plan designates this area as a Resource Management Area. Under the 2040 Plan, Resource Management is a land use category that provides county growth opportunities while emphasizing wise management of land and water resources. The purpose of Resource Management is to provide opportunities for the implementation of Smart Growth development that respects the character and carrying capacity of the land.

Staff recommended Findings of Fact:

1. Solar-electric (photovoltaic) systems that provides retail electric power are being added to the Zoning Ordinance as a defined use and listed as a special use "jj. Solar, utility" in the F District – Farming , subject to that the zoning board may recommend and the county board shall stipulate such conditions and restrictions, upon the establishment, location, construction, maintenance and operation of the special use as is deemed necessary for the protection of the public health, safety and welfare.

Attachments: Location Map
 Township Map
 Petitioner's finding of fact sheet

Property Address: Lorang Road at Seavey Road, Elburn, Illinois	
Owner: Timothy P. Slamans (Diamond Street Partnership)	
Parcel ID: 11-31-100-009	Acres: 24 Lease Property
Municipality: Unincorporated Blackberry Township	County: Kane
Latitude: 41.820712 N	Longitude: -088.487798 W

Project Narrative

Solar Energy Background

The State of Illinois has issued new energy requirements to Commonwealth Edison and other utilities to provide customers with a green power alternative. The Future Energy Jobs Act, which took effect in 2017, requires Illinois utility companies to get 25% of their retail power from renewable sources like solar and wind by 2025. The state is looking to add 2,800 megawatts of new solar energy over the next few years.

In April 2018, the Illinois Commerce Commission approved an update to the state’s plan for utility companies to buy renewable energy credits which includes production by new large-scale solar farms, community solar gardens and rooftop solar installations to meet the state’s renewable energy goals.

The rapid expansion of solar development is due in part to relatively inexpensive farmland and ready access to the ComEd and Ameren electrical grids. The Future Energy Jobs Act created a budget of more than \$200 million annually for utility companies to purchase renewable energy credits while also establishing programs and incentives to spur the development of solar installations.

Project Summary

Soltage, LLC is requesting a Special Use Permit to construct a 2-Megawatt Ground Mounted Solar Energy Farm on an approximate 9 acre portion of agricultural property, zoned F (Farming District) that is located along Lorang Road at Seavey Road within Unincorporated Blackberry Township in Kane County.

The solar energy systems will be designed and constructed to minimize glare or reflections on adjacent properties and roadways and to not interfere with traffic, including air traffic, or otherwise create a safety hazard.

Existing topsoil will not be removed from the site during development unless the removal is expressly approved as part of the special use permit. Given the temporary nature of the metal pile foundations and other development features, the future intention is that this property be returned to productive agricultural use following decommissioning of the site.

Project Description and Analysis

The subject ground mounted solar energy system development will generate and provide a maximum of 2 Megawatts of electric power and will be interconnected with ComEd Electrical Distribution Facilities.

Development Features

The proposed solar energy development will include the following features:

- Ground mounted solar panel arrays on a fixed tilt system
- Module, String and Racking System
- Inverter and Transformer set on a concrete pad foundation
- Proposed Riser, Meter, Disconnect and Recloser Poles
- 3 phase Electric utility interconnection at the existing power pole located along the west side of Lorang Road
- Security Fencing per National Electric Code (NEC) 7 foot high chain link fencing. (Proposed Enclosure is 9.08 acres)
- 20-foot-wide chain link gate
- Underground electric cables trenched and installed
- 20-foot-wide gravel service road for construction and future maintenance activities access is from the east side of Lorang Road.

The proposed project construction cost is estimated as \$3M.

Construction Activities

The proposed sequence of construction activities will include the following:

- Contact JULIE for field identification and marking of existing utilities
- Field Identification of existing Farm tile systems
- Secure the site and install Perimeter Erosion Control Silt Fence
- Establish staging area for equipment and materials
- Installation of the gravel service road and roadway culvert along Lorang Road
- Install Concrete Inverter and Transformer Pad
- Reconfigure drain tiles within project work site to avoid conflict
- Install Solar Panel metal pile foundations
- Install solar panel system
- Install underground electric cables and Poles
- Soil Tilling and Preparation of Site for seeding with low profile native vegetation
- Installation of security fencing and gate
- Make Final Connection to ComEd Power Poles
- Final Inspection

Operation and Maintenance (O&M)

As a long-term solar system owner and operator, Soltage believes that a focused and effective preventive maintenance regime, coupled with an integrated onsite and supplier-backed spares management program, is key to maintaining high operational performance and efficiency. Prevention is, after all, far better than cure, and our preventive maintenance plan includes triannual site visits whereby trained technicians physically inspect each system and evaluate the condition and performance of key system components. Additionally, on an annual basis, all electrical equipment is inspected in further detail, with electrical terminations and connections being carefully checked for corrosion, tightness, and, through thermal imaging, excess heat during operation. Unlike many companies which have adopted hands-off and less-detailed aerial inspections, Soltage performs and tracks system-wide IV (current-voltage) curve trace tests annually and believes this to be the best and most reliable indicator of the actual condition of a solar photovoltaic (PV) system. Every Soltage site is extensively monitored in real-time for operational performance and efficiency. Using proprietary techniques based upon SPC (statistical process control) principles, operational performance trends are calculated and analyzed. In this manner, we aim to identify, diagnose and correct potential system issues before they become actual problems. Through our real-time monitoring and performance evaluation systems, Soltage's dedicated asset management team reviews and reports site performance on a daily basis. In the event of adverse performance trends, actual under-performance, or equipment failure, automated alarms are generated to immediately notify our Asset Management and O&M teams for further diagnosis and action. In the event that on-site inspection or repair is necessary our O&M teams can be dispatched to any site within 24 hours and, typically, on the same day. Finally, in addition to operating and managing our own assets, Soltage provides a full suite of asset management and performance monitoring services to third-party solar PV system owners which rely upon us for the regulatory, commercial, legal and operational management, performance and compliance of their systems.

As a solar PV system owner-operator for over a decade, accurate data acquisition and real-time system monitoring are at the heart of Soltage's business. To this end Soltage standardized upon the Powertrack energy monitoring system by Also Energy, with proprietary customizations based upon our experience and specific to our needs. The Powertrack platform provides accurate and reliable production data, together with component and system-level performance information and the weather conditions at the site, and records this information continuously and over the long-term. SVCE will have direct online access to the Powertrack system and our customers often use this for sustainability communications and marketing purposes. Further information on the Powertrack platform is available at: <http://www.alsoenergy.com/wp/pv-monitoring/powertrack-products/> While fundamentally important, the Powertrack system is only a small part of our overall data

management picture. In addition to our own solar PV systems, as an industry-leading third-party solar Asset Management company, Soltage is responsible for the operation, maintenance, and long-term legal and regulatory compliance of all of the systems under management including those owned by our customers. Recognizing an unaddressed opportunity in the market, Soltage, together with PowerHub, developed a state-of-the-art solar asset management software platform. This couples our asset management experience and proprietary algorithms with PowerHub's exemplary software platform, providing us with the most powerful and efficient solar asset management and monitoring capability in the industry. More information on the Soltage / PowerHub Asset Management platform can be found at: <http://go.powerhub.com/blog/august-blog-using-software-to-maximize-yoursolar-assets-for-sustainable-growth>

Decommissioning of Site

The decommissioning plan shall include the following:

- The anticipated means and costs of removing the solar farm.
- Provisions for the removal of all structures and foundations, the removal of all electrical transmission components, the restoration of soil and vegetation, and a soundly-based plan ensuring financial resources will be available to fully decommission the site.
- Facility equipment including inverters, transformers, and switchgear to be removed from their respective concrete pads (if applicable) and recycled or returned to manufacturer for processing.
- Chain-link fencing to be removed and sold or recycled.
- Access road gravel and culvert to be removed and recycled or reused.
- PV modules to be recycled or reused.
- Racking system to be cut, stacked, and recycled, resold, or reused.
- All concrete will be removed and recycled.
- AC and DC wiring that can be disconnected and removed from equipment and earth will be consolidated for recycling.
- On-site power poles and medium voltage wiring shall be removed (unless poles were pre-existing).
- Re-grading and re-seeding of vegetative layer where impacts occurred.

(Refer to the attached decommissioning plan for details.)

Vegetation Maintenance

The Vegetation on the site will be managed through a local contractor and with a scope of work specifically tailored to meet the needs of the site. Generally, vegetation maintenance consists of periodic groundcover mowing and management to prevent the establishment of woody vegetation and to maintain ground cover below a maximum height, and weed management whereby weeds and climbers are prevented from overgrowing equipment and fences. Vegetation maintenance will take place throughout the growing season where and when necessary to appropriately maintain the site.

Stormwater Management

The proposed solar energy development site grading will be very minimal and will generally follow the existing contours of the ground. The site is generally flat but has a moderate slope to the northeast across the site. The existing drainage pattern is divided by a primary ridge line from the middle of the north property line and extends southerly to the center of the site thence easterly and southerly to the south property line. A secondary ridge line extends from the middle of the east property line southwesterly to the aforesaid primary ridge line. Runoff from the west three-fifths portion of the site generally sheet flows toward a small swale with a positive 0.6% slope northeasterly toward the Seavey Road ditch and continues to drain to the east off the site. Runoff from the northeast one-fifth portion of the site generally sheet flows toward a small swale with a positive 1.9% slope northerly toward the Seavey Road ditch and continues to drain to the east off the site. Runoff from the southeast one-fifth portion of the site generally sheet flows toward a small depression near its center and has no apparent outlet. Existing farm tiles which may be present on the site will be located and identified in a drainage investigation report. The existing tiles will be maintained, relocated or replaced with ADS HDPE drain tile prior to construction, as needed, to avoid conflict with the proposed solar panel foundation system. In all cases, existing drainage patterns and roadside ditches will be maintained. It is anticipated that the storm water impacts from this development will be minimal given that the existing row crops are to be removed from within the approximate 9.05 acre area of the proposed solar development and replaced with perennial vegetative ground cover, having a deeper root system that will allow for increased infiltration of stormwater into the ground and improved water quality. The proposed impervious surfaces generally include the gravel access road and the small concrete pad for the proposed inverter and transformer equipment and will have a minimal impact on stormwater runoff generated from the site.

Facility Safety

During construction, the Engineering, Procurement, and Construction (EPC) team will follow all applicable OSHA laws and regulations. The facility be surrounded by a chain-link fence and will be locked. The facility will have a county approved and registered address. All DC & AC circuits will have appropriate over-current protection devices and system components will have a UL Listing. The facility electrical design will comply with all applicable local, state and federal regulatory codes, including the Illinois Uniform Building Code, as amended; and the National Electric Code (NEC), as amended and adopted by the State of Illinois. The facility operations will be remotely monitored around the clock and appropriate personnel dispatched in the event of any malfunction. An appropriate warning sign shall be provided at the entrance of the facility and along the perimeter to the solar farm. The sign at the entrance to the facility shall include the facilities 9-1-1 address and a 24-hour emergency contact phone number. Further, in the event of an emergency, the local 9-1-1 call center and emergency services will be notified as necessary.

Traffic Control Plan

All work zone traffic control and protection, and other advisory signs needed for construction shall be in accordance with the latest edition of the Manual on Uniform Traffic Control Devices (MUTCD), the Illinois Department of Transportation (IDOT) "Traffic Control Field Manual", and meet approval of all interested municipalities, local agencies and emergency service providers.

All work zone traffic control and protection needed for the construction and facility operation shall be in accordance with Division 700 of the latest edition of the IDOT "Standard Specifications for Road and Bridge Construction".

Site Access Routes

All trucks associated with transporting components and equipment for construction, operation or maintenance of the solar energy development shall be restricted to utilizing Lorang Road (a Blackberry Township route) via Harter Road (CR 4) and Illinois Route 47 for access to the site.

All applicable permits from the respective highway authority shall be obtained prior to construction, as needed.

Kane County Solar
Diamond Street Partnership Site Decommissioning Plan
July 2018

Prepared for:

Kane County Development Department

This decommissioning plan is requested by the Kane County Development Department and will generally address the standard protocol for expected decommissioning activities.

1. Introduction

SOLTAGE IL Devco, LLC solar project will be a two (2) megawatt (AC) solar farm, located along Lorang Road at Seavey Road, Elburn, Blackberry Township, IL. The solar farm will be constructed in 2019 and will have an operating life of approximately thirty-five (35) years. At the end of the project's lifetime, or if the facility has been non-operational for more than twelve (12) months¹, SOLTAGE IL Devco, LLC, the owner of the project, will remove the system allowing for restoration of the project site to its original status. SOLTAGE IL Devco, LLC will be responsible for all costs of decommissioning the system. SOLTAGE IL Devco, LLC will notify the Kane County Development Department that the project will be decommissioned. The system will be removed within six (6) months of this notification.

This decommissioning plan outlines the steps to remove the system, dispose of or recycle its components, and restore the land to its original state. SOLTAGE IL Devco, LLC will remove and dispose of all equipment, electric conduit, support structures, fencing, roads, and foundations. The plan is based on current best management practices and procedures. This plan may be revised if standards or best management practices change between now and decommissioning. The appropriate construction permits will be obtained prior to the decommissioning process if required. All equipment removal will be completed in accordance with any applicable regulations and manufacturer recommendations. SOLTAGE IL Devco, LLC will not be responsible for removing equipment owned by the local electric distribution company (ComEd or its successor).

SOLTAGE IL Devco, LLC will manage and coordinate the construction, operation, and decommissioning of SOLTAGE IL Devco Solar project. SOLTAGE IL Devco, LLC is the Tenant of the property on which the project is located. The contact information for SOLTAGE IL Devco, LLC is:

SOLTAGE IL Devco, LLC
c/o Soltage, LLC
66 York Street, 5th Floor
Jersey City, NJ 07302
Attn: Stephen Goodbody
sgoodbody@soltage.com

¹ The facility will be considered abandoned if the facility is non-operational for twelve (12) months and the Owner is not actively repairing the facility.

2. Equipment Dismantling and Removal

The facility's equipment will be dismantled and removed according to the following steps:

- a) The solar facility will be disconnected from the utility electric distribution grid.
- b) The photovoltaic modules will be disconnected and collected. The modules will be disposed of at an appropriate recycling facility or sold to be re-used for another solar project.
- c) All aboveground and underground electrical interconnection and distribution cables will be removed and disposed of at an appropriate waste facility. Underground electrical wires will be removed to a depth of four (4) feet below the surface of the ground.
- d) The facility's metal racking system will be removed. The metal will be disposed of at an appropriate waste or recycling facility or sold for re-use. Foundations and support posts will be removed in their entirety.
- e) Electrical and electronic devices, including transformers and inverters will be removed and disposed of at an appropriate waste facility.
- f) Concrete electrical pads will be removed and disposed of at an appropriate waste facility.
- g) Fencing will be removed and disposed of at an appropriate waste facility.
- h) Access roads may be removed. Gravel and other road materials will be evaluated and disposed of at an appropriate waste facility if deemed necessary.

Best practices will be employed during the decommissioning activities to minimize environmental disturbance.

3. Site Restoration

Before decommissioning begins and dismantling commences, proper erosion and sediment control measures will be installed as necessary. Once the equipment has been removed, the project site will be restored to a similar state as its pre-construction condition. The land may be seeded with a low-growing species to stabilize soil conditions.

4. Managing Materials and Waste

As part of the decommissioning process, a variety of materials will be removed and reused, recycled, or discarded. Materials will be re-used or recycled to the greatest extent possible. SOLTAGE IL Devco, LLC will work with equipment manufacturers, local contractors, and waste firms to manage the appropriate separation and disposal of the materials. The following table indicates how the disposal of each waste material will be managed.

Waste Material	Disposal Management
Photovoltaic Panels	Sold for re-use in another solar project, returned to the manufacturer for appropriate disposal, or brought to an appropriate recycling facility where the components of the panels will be separated and recycled
Metal Racking System	Sold for re-use or recycling at an appropriate recycling facility

Transformers	Returned to the manufacturer for re-use or brought to an appropriate waste disposal facility. The small amount of oil in the transformers will be removed onsite before transport of the equipment to reduce potential spills and will be disposed of separately at the appropriate facility
Inverters	The metal components will be sold for re-use or recycled at an appropriate facility. The remaining components will be disposed of at an appropriate waste facility
Gravel	Brought to a facility for processing for salvage and re-use
Concrete Equipment Pads	Brought to an appropriate recycling or waste facility
Cables, Wiring, and other electric equipment	Brought to an appropriate waste facility or sent to the manufacturer for reuse or recycling
Fencing	Brought to an appropriate metal recycling facility
Hazardous Materials (if any)	Disposed of in accordance with Federal and State Law
Other Debris	Separated into recyclables and waste and brought to the appropriate waste facility

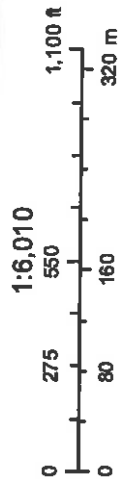
5. Decommissioning Notification, Agreement and Construction Permits

The Kane County Development Department will be notified that the project will be decommissioned. The required construction permits will also be obtained before commencement of decommissioning activities, as required.

Map Title



September 11, 2018

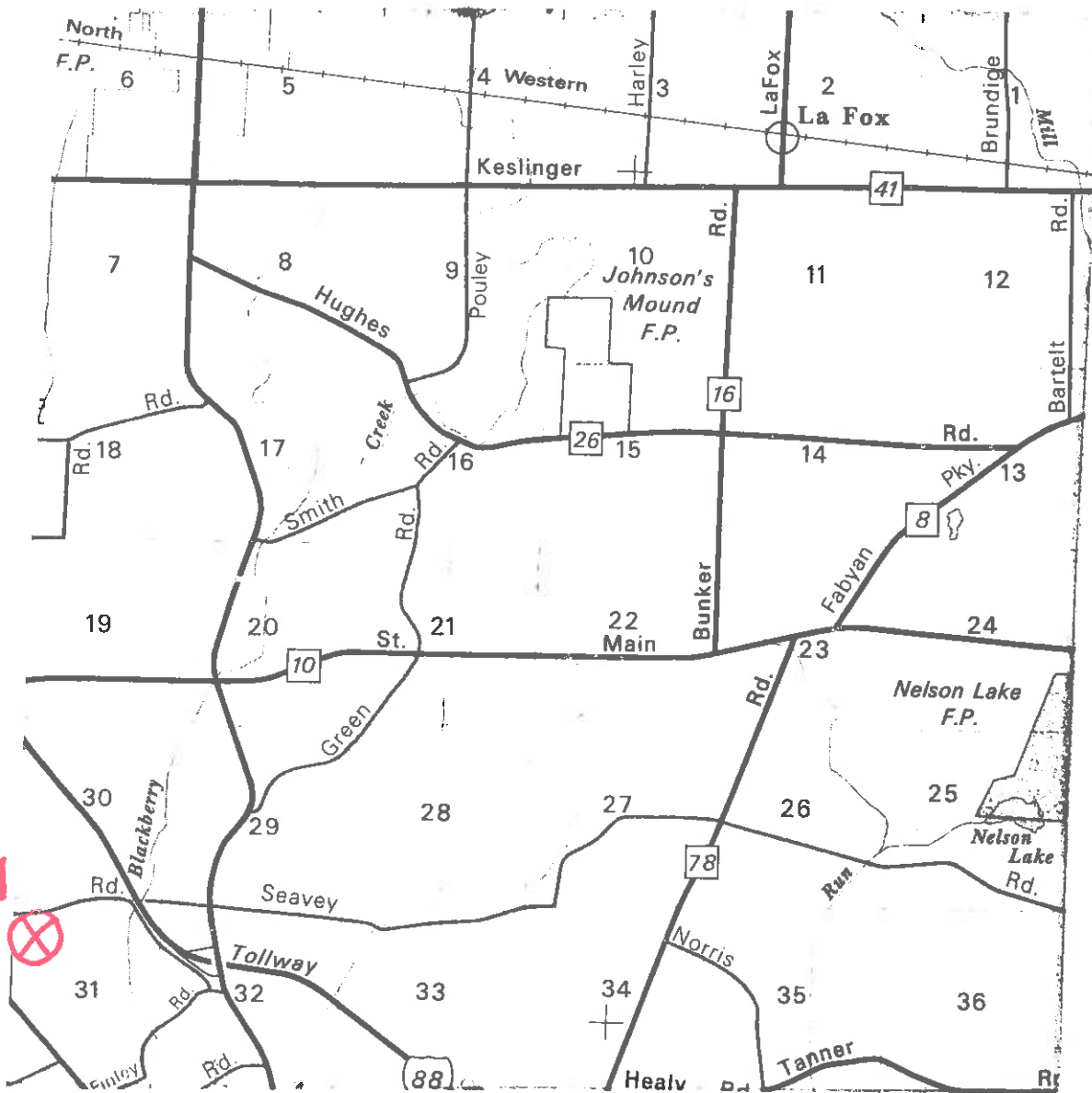


These layers do not represent a survey. No Accuracy is assumed for the data delineated herein, either expressed or implied by Kane County or its employees. These layers are compiled from official records, including plats, surveys, recorded deeds, and contracts, and only contains information required for local government purposes. See the recorded documents for more detailed legal information.

BLACKBERRY twp.

T.39N - R.7E

map 11



1" = 1 MILE