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November 7, 2018 *Submitted via electronic mail*

Colorado Springs – Planning and Development
Attn: Rachel Teixeira
30 S Nevada Ave, #150
Colorado Springs, CO 80903

SUBJECT: **Response Letter: CPC CM1 18-00105**
COL02018/ Mesa & Fillmore / FA#10148708 / LTE-4C,5C,4T4R

FACILITY ADDRESS: **2715 Mesa Road, Colorado Springs, CO 80904**

Dear Ms. Teixeira:

This letter is in response to comments from your letter dated August 21, 2018. Your comments have been copied below in *italics*, with our responses in **blue**.

1. *Provide the file number 'CPC CM1 18-00105' in the lower right corner of all submitted sheets.*

   File number has been provided on all sheets in the lower right corner.

2. *Explain why the height, design and the location of the cellular tower as a monopine was decided upon in the project statement summary.*

   First and foremost, this project represents cooperation between Colorado Springs Utilities, AT&T, and T-Mobile, as CSU has requested that all cellular equipment be removed from the water tower. Removing the existing cellular equipment from the water tower will enable CSU to better perform maintenance on the water tower, and also allow the wireless carriers to perform maintenance without interfering with CSU operations. It is important to note: the exact location of the generator (shown on Sheet 4 of 12) may change as CSU finalizes construction of their facility improvements; the final location will be included on future plans and permits.

   There are many factors that lead into the height, design and location of the cell tower.

   Height: AT&T is the nationally designated carrier to build FirstNet – the first nationwide broadband network dedicated to public safety users. The 100' height will maximize coverage abilities for First Net.

   Secondly, it is a preference of the City that any new wireless facility be designed to co-locate multiple wireless carriers. Therefore, in order to accommodate three carriers, there must be a vertical separation between antenna arrays to avoid interference. The bottom array of antennas (current future carrier) must be located at a height above the water tower in order to provide 360° coverage, otherwise, the water tower

FIGURE 4

itself would create interference. As an alternative, three towers at a level of 76' could be provided, however, due to space constraints on CSU property, as well as the visual impact of three towers, this is not desirable.

<u>Design:</u> It is a preference of the City that any new wireless facility be designed in a stealth manner. In their review of potential stealth facilities, CSU officials decided that a monopine facility would be the least intrusive option, as there are existing coniferous trees with which it can blend. A monopine also provides the most flexibility for accommodating future technology changes as opposed to a canister-style system. A slim pole design (antennas completely concealed within cylinder) would not provide the coverage needed by the wireless carriers due to space constraints. Slim poles would also create operational issues for CSU during times of antenna maintenance, as more space and time would be needed for the dismantling of the stealth cylinder for regular periodic maintenance. Other stealth structures such as a faux clock tower, for example, would cause more attention than desired, as there are no comparable structures of such bulk and height in which to blend.

<u>Location:</u> The CSU property includes a complex network of above ground buildings and structures, underground infrastructure, and planned new improvements. The intent to locate the monopine near the water tower was based on the decision to keep the structure internal to the site. The proposed placement allows for the most natural screening as this area contains the highest concentration of above-ground structures and trees, while also accommodating for future CSU expansion plans. The exact location of the structure was then predicated on below-ground utilities and required setbacks.

It is a preference of the City to locate CMRS facilities as follows:

- ***on existing structures (ie: water tank)* – this is no longer a possibility due to CSU requirements of removing existing equipment off the water tank.**
- ***on City or CSU owned sites as long as the facility will not have an impact on operations, and can lessen visual impact over privately held sites within the same vicinity* – the proposed location will have the least impact on operations and least visual impact versus privately held land.**
- ***In locations where existing topography, vegetation, and buildings provide greatest visual screening* – the proposed location is in the center of the property with the highest concentration of buildings, structures, and vegetation.**

Furthermore, while stealth CMRS facilities are exempt from setback requirements, this facility does meet the freestanding setback from residentially zoned properties (distance equal to 5x the height of the tower).

3. *Modify the search area summary to include the justification for the three criteria for a conditional use:*
    - *Surround Neighborhood*
    - *Intent of the Zoning Code*
    - *Comprehensive Plan*

FIGURE 4

Surrounding Neighborhood:
The proposed project will bring First Net coverage to this area, enhance wireless communications, and allow CSU to expand and renovate their facilities. The proposed use of a free-standing stealth facility designed as a monopine meets the criteria of the Zoning Code, and is intended to blend in with the existing backdrop of adjacent trees, lessening the visual impact of the surrounding neighborhood. Extensive public outreach by CSU has been conducted with the neighboring residents to receive input and comments, on which this design was finalized.

Intent of the Zoning Code:
This project complies with the design, location, and development standards of the Zoning Code. This includes the use of stealth design, location on public property (preference over private property) and the ability to co-locate multiple wireless providers.

Comprehensive Plan:
The proposed project is consistent with the Comprehensive Plan as it is expanding and improving two necessary public services – water and communications. This facility will conform to all applicable approvals and the PF district in which it is located.

4. *Provide a sheet that illustrates the site with an aerial view of the site and the surrounding properties.*

   Sheet 2 of 12 has been included which shows the aerial view of the site and surrounding properties, with proposed monopine and existing equipment shelter shown.

5. *Provide an elevation (existing and proposed views) of the equipment shelter. Add the details (materials, height, dimensions, etc) of the equipment shelter to the site plan.*

   Sheet 9 of 12 has been included which shows the elevation view of the existing equipment shelter – currently standing at 10' tall, 16' long and 12' wide. The shelter consists of a prefab composite material (picture of shelter enclosed). No changes will be made to the equipment shelter. In this view, the proposed generator is also shown, however, the exact location of the generator may change as CSU finalizes construction of their facility improvements.

6. *Add some landscaping (tall trees) along the north and eastern sides of the proposed monopine facilities for buffering. Provide a separate sheet for the landscaping.*

   Space is limited for additional trees in the immediate vicinity of the monopine and water tank due to existing underground utilities, buildings, pavement, sediment basins, and retention basins. Views of the facility from the east will mostly be blocked by Coronado High School, as well as existing trees spaced along Fillmore Street. Views

FIGURE 4

of the facility from the north will mostly be screened by an existing CSU garage building, as well as trees spaced along Inwood Road.

7. *Note the comment from Colorado Springs Utilities, Engineering Development Review, Traffic Engineering, and Water Resources.*

   All departments have stated they have no comments. Colorado Springs Utilities provided "informational" items which pertain to: connection of water/sewer (not applicable), extension of electrical facilities (not applicable), and setback/clearance requirements for landscaping relative to utilities (included in location/design of monopine).

8. *Written correspondence was received from numerous adjacent property owners, please provide a response to these documents based on the information provided. Add the response information in the project statement. Also, provide an explanation based on the following item(s), and add these responses to the project statement:*

   - *Add trees around the proposed cell tower to buffer the proposed cellular structure.*

   Space is limited for additional trees in the immediate vicinity of the monopine and water tank due to existing underground utilities, buildings, pavement, sediment basins, and retention basins. Views of the facility from the east will mostly be blocked by Coronado High School, as well as existing trees spaced along Fillmore Street. Views of the facility from the north will mostly be blocked by an existing CSU garage building, as well as trees along Inwood Road.

   - *Better location for the tower.*

   The removal of the cellular equipment off the water tank is at the request of CSU in order to allow for improvements and better ease of future maintenance and operations. Other locations within the CSU property would mean that the facility would be closer to public roads and viewsheds, thus more open to view. The chosen location is internal to the CSU property and near a concentration of trees.

   - *Proposed tower be no tall than the existing water tower.*

   Limiting the height of the monopine to height of the water tower will limit the coverage capabilities, provide areas of interference/no coverage, and limit the ability to co-locate multiple carriers on one structure. The 100' height will provide optimal coverage for First Net antennas, the first nationwide broadband network dedicated to public safety users. In addition, City requirements call for the ability to co-locate multiple wireless carriers on the same tower, which requires vertical separation between each carrier and adds height to the structure.

FIGURE 4

- *Tree tower is not compatible to the neighborhood.*

Other options have been explored which include faux structures (clock or bell tower) however, these structures would more likely draw attention. The use of concealed canisters would defeat the coverage objectives as the design limits the number and size of antennas. A faux tree design was settled on as it allows flexibility in technology changes, while keeping with the natural setting of vegetation.

Hard copies of this letter and the revised plans will be sent to your attention via Fedex as requested.

AT&T appreciates your assistance in the continuing operation of this wireless communications facility. In the event there are any questions, comments or concerns, please contact me at (303) 256-4015, or via e-mail at chmielaks@bv.com.

Very truly yours,

Sarah Chmielak

Sarah Chmielak

FIGURE 4