PROJECT STATEMENT
FOR
RELOCATION OF WIRELESS COMMUNICATION ANTENNAS TO NEW 80' MONOPOLE

Submitted to City of Colorado Springs
Land Use Review Planning & Community Development

December 2020

1. GENERAL INFORMATION

Applicant: Crown Castle
Todd Daoust
109 East Tuckey Lane
Phoenix, AZ 85012

Site Address: 5590 North Nevada Avenue
Colorado Springs, CO 80918

TSN: 63191-01-063

Crown Castle Site: 829763 – Fellowship Bible Church

Property Owner: City of Colorado Springs

Request: Approval of a New 80' monopole to support the *relocation of existing wireless communications equipment.* This request is necessitated by the demolition of the Fellowship Bible Church and the development of the new Lexus Dealership (see CPC ZC 20-00047 and CPC DP 20-00048).

Zoning Classification: C-6 General Business

2. INTRODUCTION

Crown Castle, a wireless communications infrastructure company operating in the City of Colorado Springs, CO, owns and operates the wireless communications facility located at 5590 North Nevada Avenue, Colorado Springs, CO 80918 ("Existing Site"). The Existing Site accommodates an abandoned Nextel facility and Sprint/T-Mobile wireless communications equipment and has provided wireless communications coverage in the area for the last 22 years. The site was approved by the City and built in 1998/1999.

Crown Castle has been part of the national community since 1994, possessing approximately 40,000 cell towers hosting approximately 91,000 carrier installations. Crown Castle's extensive infrastructure, including fiber and small cells as well as towers, serves as the backbone of the nation's communication network. The existing site is a critical component of that network, providing continuity for the public interest, emergency 911-call services, and reliable long-term stability for wireless service in the Colorado Springs Community.

Crown invests heavily in the resources necessary to ensure quality, reliable wireless service for the area. In addition to its in-house legal team dedicated to addressing compliance matters, Crown also conducts annual safety inspections on all towers and employs a national operations center monitoring all critical systems 24 hours a day, 7 days a week, 365 days a year. In the event of an emergency, Crown is prepared with a national disaster recovery program on standby with the objective of maintaining wireless communications to the extent possible.

3. REQUEST

This application submittal anticipates that the following formal request be made to the City of Colorado Springs:

1) Approval of a Conditional Use Permit for a new "Non-Stealth" Facility for an 80' communication tower.

4. PROJECT DESCRIPTION/HISTORY

The Existing Site currently houses an abandoned Nextel shelter in a 20' X 30' compound and Sprint/T-Mobile equipment in a 20'X 30' outdoor compound used in conjunction with panel antennas mounted to the roof of the nearby church building. The site was approved and permitted by Sprint in 1998/1999.

The Fellowship Bible Church is currently under contract to sell the property to Baxter Auto Group, with plans to demolish the church facilities and construct an auto dealership (see CPC ZC 20-00047 and CPC DP 20-00048).

The demolition of the existing church buildings and WCF equipment compounds in preparation for the development of the auto dealership requires a replacement structure and equipment compound to be constructed to maintain coverage in the area. The auto dealership has requested the antennas be relocated onto a new 80' monopole located within a new 35' X 64' compound on the western edge of the property.

Exhibit 1 (Existing Site)

The pending ownership of the property has requested the new 80' monopole be installed at the existing equipment compound at the western boundary of the parcel. This location, situated in a landscape buffer area between groups of (future) proposed parking stalls, will not impact parking or traffic flows and is consistent with the future anticipated use of the property.

The applicant is proposing to increase the size of the equipment compound to 35' X 64' to enclose the existing Sprint/T-Mobile equipment and monopole while allowing for future carrier equipment deployment (collocation). The proposal will allow additional wireless carriers to locate in the compound and on the structure (see Exhibit 2, below), thereby creating infrastructure for additional wireless carriers to improve the coverage and capacity of their networks.

The Applicant is proposing to build an 8' CMU wall around the monopole and the carrier equipment to screen the material from public view. The CMU wall will be painted to match the proposed buildings and trash enclosures of the proposed auto dealership to integrate the proposed wireless communications facility into the car dealership development. The proposed monopole will accommodate additional carriers on the vertical plane to deliver high-capacity wireless services and creates a centralized location for future wireless providers to deploy quickly, effectively, and efficiently in the future. The proposed 80' monopole will be painted a flat, non-metallic beige color.

Exhibit 2 (Proposed new relocation equipment compound)

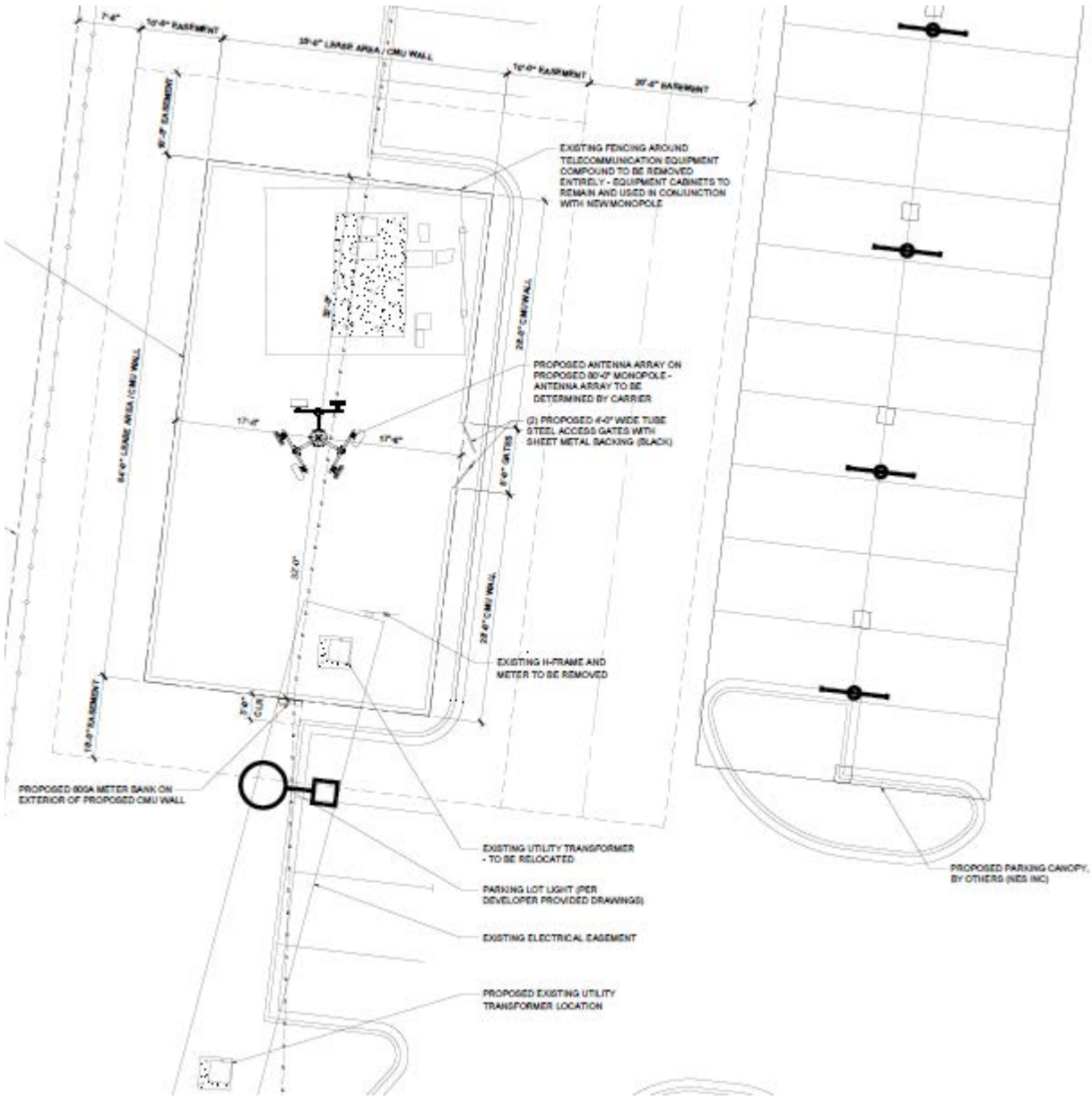

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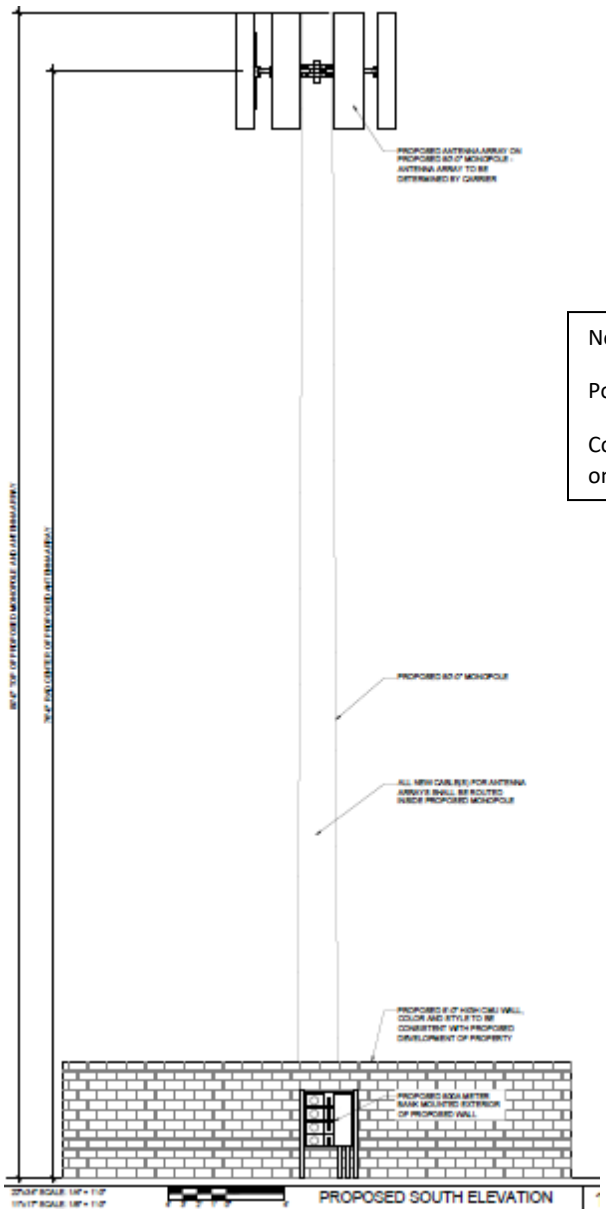
Exhibit 3 (Proposed elevation)



Note:

Pole to be painted flat (non-metallic beige).

Compound walls to be painted to match new on-site trash enclosures.

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5. ZONING (FINDINGS/COMPLIANCE)

The Proposed Site is zoned General Business (C-6) within Colorado Springs, where non-stealth freestanding Wireless Communication Facilities are allowed with a Conditional Use Permit.

Generally speaking, the parent parcel and proposed site are situated in an area bordered by Interstate 25 to the north and west, Nevada Avenue (Major Arterial) to the east, and Garden of the Gods Road to the south (encompassing approximately .53 square miles). No single-family zoning designations or land uses occur in this area. The closest single family residential dwelling units are 3500 +/- feet to the west (R1-9) and 4800' to the South-Southeast (R1-6).

Google Earth View

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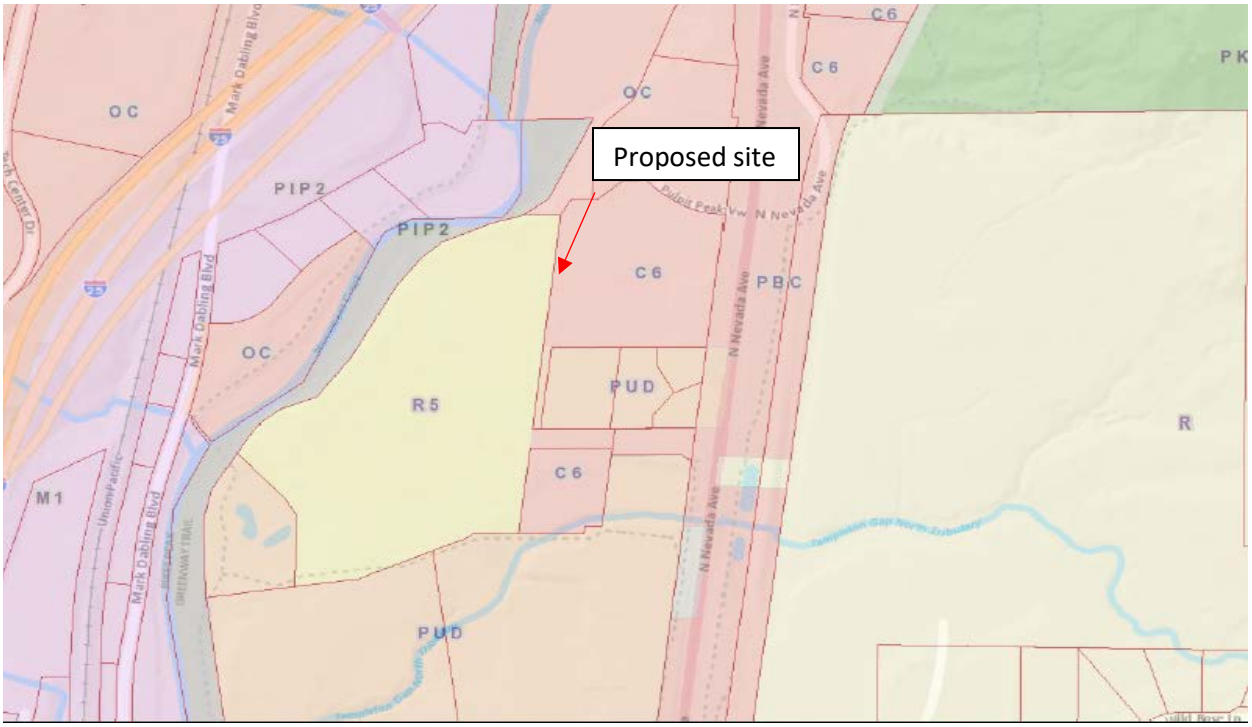
The surrounding zoning and land uses are as follows:

Surrounding Zoning and Land Uses

Direction	Existing Zoning	Existing Use
Site	C-6	Religious Facility to Car Dealership (pending)
North	OC (Northeast) & OC SS (Northwest)	Warehouse and Hospital (Northeast) & Political Subdivision (Colorado Springs)
East	PBC	North Nevada Avenue (Principal Arterial-265' ROW)
South	PUD/CR CU	Veterinary Hospital and Vacant Lots
West	R5/SS	Apartment Building



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The proposed site observes the following setbacks (as measured from the boundaries of the Leased Parcel/compound) from the Property lines:

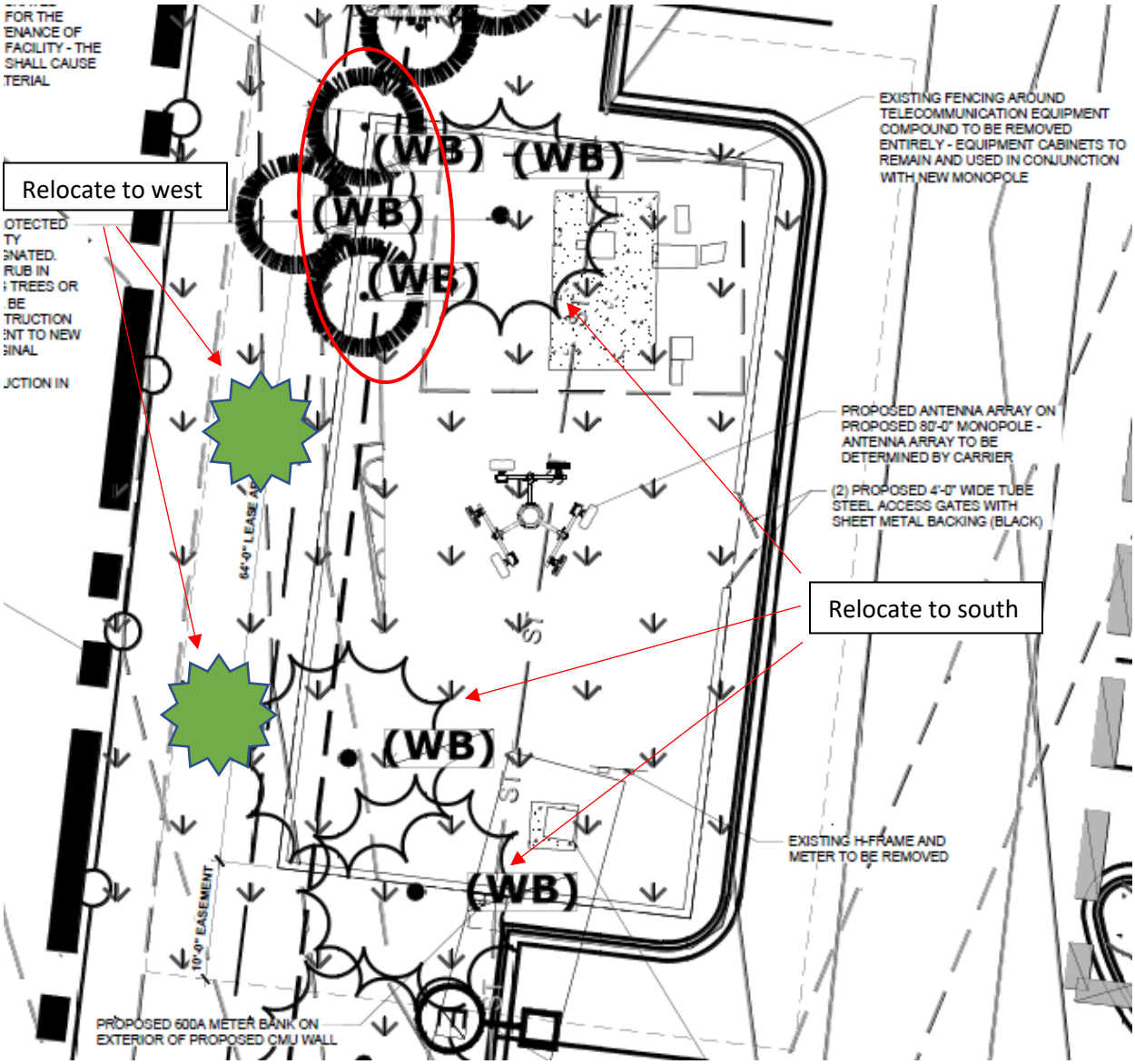
WCF Compound Setbacks from Property Lines

Direction	Distance	Adjacent Use
North	151'-10'	Warehouse and Hospital (Northeast) & Political Subdivision (Colorado Springs) OC
East	546'-5"	North Nevada Avenue (Principal Arterial-265' ROW) PBC
South	268'-1"	Veterinary Hospital and Vacant Lots (PUD/CR CU)
West	17'-5"	Apartment Building (R5/SS)

LANDSCAPING

The proposed relocation site is located within the landscape buffer on the western boundary of the parcel. Three evergreen trees exist in the area impacted by the proposed relocation site. These trees are proposed to be relocated to the area south of the proposed new equipment compound.

In addition, the recently approved Development Plan (CPC DP 20-00048) contained a Landscape Plan with new plantings that would be impacted by the proposed new relocation facility. The 2 proposed new plantings would be moved to the west side of the compound wall to provide additional vegetative screening.



6. CARRIER COVERAGE

The need for wireless service is determined by market demand, coverage requirements for a specific geographic area, and the obligation to provide continuous coverage from one site to another in a particular geographic region to avoid call failures, dropped calls and slow data speeds. Approval of this application will allow Sprint/T-Mobile and potentially future wireless carriers to meet the service demands of this area from this particular location.

The site has historically provided coverage to Interstate 25, Nevada Avenue, and the immediate surrounding commercial areas. The demolition/decommissioning of this site would create a gap in coverage for this critical area of Colorado Springs. Within this coverage gap are some of the heaviest traveled corridors within the City. In addition, western portion of the University of Colorado-Colorado Springs campus would be affected by this loss in coverage.

Generally speaking, Wireless Communications Facilities operate on line of sight. The greater the height, the better the coverage area. The existing rooftop facility is lower in height than the proposed relocation site and therefore provides less coverage than the proposed relocation site.

The Property' location and the proposed relocation site's placement within the property, together with the property's zoning and surrounding land use make this location superior to other locations in the area. The development of a taller replacement site capitalizes on the site's superior location and land use attributes and increases the coverage from this location. In addition, the design will accommodate additional wireless carriers, eliminating the need for additional sites in the immediate area. Lastly, capitalizing on increased coverage afforded by this superior site will enable less intense WCF uses (i.e. small cells) to be deployed in more sensitive areas with less intrusive impact.

Wireless coverage provided by communication sites, such as the one at this location, will function as an important link to complete and fortify the overall communications network locally and nationally. The Project will be an essential part of the carrier's regional wireless networks. This site will fill a significant gap in coverage and expand coverage in the area, and as evidence, a propagation coverage maps are shown below.

Site Justification

A. Least Intrusive Means to Fill a Significant Gap in Coverage.

Section 332(c)(7)(B)(i)(II) of the Federal Telecom Act bars local governmental decisions from precluding the provision of wireless services:

> The regulation of the placement, construction, and modification of personal wireless service facilities by any State or Local government or instrumentality thereof—
> ***
> (II) shall not prohibit or have the effect of prohibiting the provision of personal wireless services.

The area in which a site can be relocated is limited because each site is a link in a chain of sites and cannot move very far in any direction once the network has been established. Moving too far one way or another would cause interference or create a gap in coverage.

The reason for this proposed relocation request is due to the redevelopment of the parent parcel. The development of the relocation site on the existing site parcel is the best location possible as neighboring cell sites have already been developed. This results in the elimination of any gap in service and coverage/capacity degradation to customers.

The direct and indirect financial benefits of reliable wireless service to the area surrounding the proposed monoelm (Replacement Tower) including the City of Colorado Springs are indicative of the very nature of the use by the public and private sector. In a recent report, the "National 911 Program," which is an office housed within the National Highway Traffic Safety Administration, found that "76 percent of consumers are using cellular phones to make 911 calls." Today, just over half – 50.8% - of American households only have a mobile voice connection and 90% of US households use wireless service. For Millennials (those born between 1982 and 2004), that increases to over two-thirds who live in mobile-only households. Wireless may also be the only connection available to access 911 and reverse 911. A 2015 survey found that cellular service is of major importance to homebuyers. It was more important than schools when looking for a home (cellular service ranked 76% versus 60% for schools). Cellular coverage trailed only crime rates (96%), local taxes (90%), and amenities (84%). Among Millennials, 83% said cell service was the most important fact in purchasing a home. (RootMetrics & Money, June 2, 2015). In 2016, wireless data traffic reached yet another record high. In all, traffic totaled 13.72 trillion megabytes – the equivalent of 1.58 million years of streaming HD video – an increase of 4.07 trillion megabytes over 2015. Over the past two years, data use has increased 238 percent. (2017 CTIA Wireless Snapshot, May 2017). With this increase in demand from users in vehicles at home and those who work from home, there is a need for facilities to meet the customer needs.

7. ANALYSIS OF FEDERAL LAW

1. Federal Telecommunications Act of 1996

In addition to local and state law, this application is governed by the Federal Communications Act, 47 U.S.C. § 332(c)(7)(B). In the Telecommunications Act of 1996, Pub. L. No 104-104, 110 Stat. 56 ("Telecom Act") Congress added Section 332(c)(7)(B), which provides rights to wireless service providers and establishes limitations upon state and local zoning authorities with respect to applications for permits to construct wireless service facilities. The express purpose of the Act is "to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers." Pub. L. No. 104-104, 110 Stat. 56, 56 (1996); see also City of Rancho Palos Verdes v. Abrams, 544 U.S. 113, 115 (2005). It also is intended to "encourage the rapid deployment of new telecommunications technologies." Id.; see also H.R. Conf. Rep. No. 104-458, at 113 (1996) (purpose of the 1996 Act is "to provide for a pro-competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services . . . by opening all telecommunications markets to competition").

Recognizing that wireless service can bring enormous benefits to communities and can boost jobs and economic productivity, this important law and subsequent regulations applicable to wireless facilities

were enacted to remove impediments to and promote the rapid deployment of wireless technology on a national basis.

The applicable limitations and directives include the following:

(a) State and local governments may not unreasonably discriminate among providers of functionally equivalent services (§332(c)(7)(B)(i)(I)).

(b) State and local governments may not regulate the placement, construction or modification of wireless service facilities in a manner that prohibits, or has the effect of prohibiting, the provision of personal wireless services (better known as the "effective prohibition clause") (§332(c)(7)(B)(i)(II)).

(c) State and local governments must act on requests for authorization to construct or modify wireless service facilities within a reasonable period of time (§332(c)(7)(B)(ii)).

(d) Any decision by a state or local government to deny a request for construction or modification of personal wireless service facilities must be in writing and supported by substantial evidence contained in a written record (§332(c)(7)(B)(iii)).

(e) Finally, no state or local government or instrumentality thereof may regulate the placement, construction or modification of personal wireless service facilities on the basis of the perceived environmental effects of radio frequency emissions to the extent that such facilities comply with federal communications commission's regulations concerning such emissions (§332(c)(7)(B)(iv)). See Proof of FCC Compliance attached as Exhibit 1.

Rapid deployment of wireless facilities is an important national issue, especially given the trend of Americans eliminating traditional landline service in favor of wireless communications. The Center for Disease Control and Prevention ("CDC") tracks "wireless substitution" rates as part of its National Health Interview Survey and publishes the findings every six months in its Wireless Substitution reports. The most recent report, issued in December of 20197, estimates that more than one-half (57%) of American homes have only wireless phones.

Reliable and robust wireless communication is essential, especially considering over half of Americans and Coloradans do not have a landline and rely on wireless service to conduct personal and business communications, to access the internet or to reach emergency responders. Ensuring access in the event of an emergency is critical, be it communications between emergency service personnel or for people calling for help.

9. CONCLUSION

Due to the land use character of Colorado Springs Colorado Springs Community and the design elements presented, the proposed site is the least intrusive to the community, extends/improves the existing coverage and preserves the aesthetics while allowing a central location to fill in the significant coverage gap that would exist if the current site went away.

The proposed relocation site will help reduce the number of towers needed to serve the community within this service area. At this time, Sprint/T-Mobile is located at the existing rooftop site, ad design that is extremely limiting from a coverage and collocation perspective. However, the relocation of this facility to the proposed 80' monopole relocation site will take advantage of the sites superior location and land use attributes to maintain and improve coverage in the area in the least intrusive means possible, In addition, the proposed relocation site will allow multiple carriers to locate within the heart of the Colorado Springs Community and deploy services quickly, effectively, and efficiently.

10. ATTACHMENTS

- Legal Description
- Lease Agreement
- Site Plan
- Photo Simulations