

October 17, 2018

Attn: Brandon Cammarata  
City of Aurora Planning Department  
15151 E Alameda Pkwy #2300  
Aurora, CO 80012

**Re: Re-Submission of Supplemental Narrative for Site Number CO-0077 at 16650 E Alameda Parkway, Aurora, CO 80017**

To Whom It May Concern,

In a continuing effort to provide telecommunications services to the City of Aurora, Eco-Site has identified the above-named property for which it requests zoning approval to construct a 60 foot monopine CMRS facility that will provide wireless coverage to the vicinity near East Alameda Parkway and South Buckley Road. In order to provide adequate coverage for our anchor tenant T-Mobile, Eco-Site has filed an application for administrative approval for this facility. This letter provides additional information to supplement information previously provided by the company on May 30, 2018.

The property upon which the proposed site would be located is zoned Planned Community Zone District Industrial and there is a self-storage facility on the property. T-Mobile is currently upgrading its network in Aurora to provide its service to the residents and visitors in the area and to improve its service capacity due to increasing customer demand. In order to provide adequate wireless services to the residents and visitors of the City of Aurora, T-Mobile must place a telecommunications facility in technologically and geographically appropriate locations. As existing users demand more data for their existing devices, the existing infrastructure will reach capacity limits and be unable to meet coverage needs. The facility will ensure that T-Mobile is able to provide reliable service to its customers in the area and will greatly improve the wireless infrastructure in the area. This facility will have the capacity to house up to three wireless providers. The proposed location was selected after an extensive search of surrounding properties that were eliminated due to geographic, zoning suitability and owner interest.

In addition to the information provided by Eco-Site in this letter and attached hereto, Eco-Site is also submitting a separate letter that requests a waiver of the relevant setback requirement pursuant to Section 146-405(G) of the Building and Zoning Code of the City of Aurora ("Code").

This letter addresses the requirements set forth in Section 146-1200 of the Code, regarding applications for Commercial Mobile Radio Service ("CMRS") Facilities:

**Documents Submitted With This Proposal:**

- Letter Re: Re-Submission of Supplemental Narrative for Site Number CO-0077 at 16650 E Alameda Parkway, Aurora, CO 80017.
- Letter Re: Applicant Responses to City Comments in Third Submission Review for Site Number CO-0077 at 16650 E Alameda Parkway, Aurora, CO 80017.
- Letter Re: Letter Addressing Waiver for Site Number CO-0077 at 16650 E Alameda Parkway, Aurora, CO 80017
- Letter Re: T-Mobile Site DN01675A RF Justification CO-0077
- Drawing set with revision date Oct 15, 2018.
- Drainage Letter Response to Comments dated Oct 17, 2018.

**Section 146-1200 Requirements:**

- (A) Purpose. The purpose of this section is to minimize negative visual impacts by encouraging building-mounted, stealth, and co-located telecommunication facilities. Consistent development review practices are promoted through the application of explicit design and location criteria and the avoidance of conditional use approvals for CMRS facilities.

Eco-Site is proposing the monopine stealth design CMRS facility in an effort to minimize any potential visual impact concerns.

- (B) Site Selection Criteria. An application for a commercial mobile radio service facility (CMRS) shall address each of the following site selection elements:

1. Potential for screening by existing vegetation, structures, and topographic features.

The proposed CMRS facility has been located at the back of a self-storage facility, behind an existing building. The stealth design will serve to further screen the facility. In addition, the proposed facility will have landscaping features around the compound to screen the facility. The proposed facility will be screened by trees on two sides, and the other two sides will be screened by the existing building structures.

2. Compatibility with adjacent land uses.

The proposed facility will be surrounded by properties that are used for commercial purposes or by open space. The location is ideal to minimize any visual impacts concerns.

3. Opportunities to mitigate visual impacts.

The proposed CMRS facility will be a monopine design (a pine tree), which will minimize any visual impact concerns. In addition, the proposed facility will be screened by trees on two sides, and existing building structures will generally conceal the CMRS facility on the other two sides.

4. Availability of suitable existing structures for antenna mounting. An applicant for a new freestanding CMRS facility shall demonstrate that a good faith effort has been made to locate its CMRS facility on existing structures including, but not limited to, existing freestanding CMRS facilities. The applicant shall demonstrate that due to physical constraints, or economic or technological infeasibility, no such location or co-location is available. The applicant shall demonstrate that contact has been made with the owners of all suitable structures within the search area of the proposed site and was denied permission to locate its CMRS facility on those structures.

Eco-Site has been working on developing the proposed telecommunications facility for T-Mobile as the anchor tenant for over a year. Diligent efforts have been made by both T-Mobile and Eco-Site to locate the CMRS facility on alternative sites, including other CMRS facilities, existing buildings or structures. There were no structures of suitable height in the

search ring. T-Mobile coverage needs contemplated the placement of its antennas at a 60-foot height. The tallest structure with rooftop attributes suitable for a CMRS facility in the search ring is about 30 feet tall. There were no other structures in the search ring that were suitable for a CMRS structure that would meet T-Mobile's coverage needs.

After it was clear that no existing buildings or structures were suitable for the CMRS facility within the search area or would meet the coverage needs of T-Mobile, Eco-Site worked diligently to find a location that would minimize any negative impact of the CMRS facility on the community and that would be the least intrusive means of addressing T-Mobile's coverage needs.

5. Search area description.

Exhibit 1 of this letter depicts the search area for the proposed CMRS facility.

(C) Design Criteria. All commercial mobile radio service facilities shall comply with the following criteria:

1. CMRS facilities shall be designed to be compatible with surrounding buildings and existing or planned uses in the area. This may be accomplished by using compatible architectural elements in the design, such as color, texture, scale, and character.

The monopine (pine tree) design of the proposed CMRS facility is designed to be compatible with the existing landscape features of the surrounding buildings and the existing planned uses in the area. The color, texture, scale, and character of the monopine design will blend in with the trees in the nearby open space area.

2. CMRS facilities shall preserve or enhance the existing character of the topography and vegetation. Existing vegetation should be preserved or improved if it is compatible.

There will be no change in any major existing vegetation as a result of the addition of the proposed CMRS facility. In fact, new trees will be added around the proposed facility in order to screen the ground equipment.

3. Roof and building mount antennae shall be screened and/or colored to match the building to which they are attached.

N/A.

4. Structures sheltering accessory equipment shall be compatible with the surrounding built or natural environments.

The equipment for the initial tenant of the CMRS facility will be placed on a platform that will support equipment cabinets near the facility. An outdoor platform with equipment cabinets is compatible with an industrial zoned property and a self-storage facility. As described above, the ground accessory equipment will be screened by new trees and existing structures.

5. A variety of techniques should be considered to screen CMRS facilities, including, but not limited to, landscaping, berming, and fencing or combinations thereof.

The proposed CMRS facility will be screened by new trees, as depicted in the drawing set submitted with this application.

6. Maximum height for CMRS facilities:

- a. The height of any freestanding or stealth CMRS facility shall conform to the height limit of the subject zone district, unless a height waiver is granted by planning commission or city council, or the structure is to be located within a height overlay district.

The facility meets the height requirement of the zone district. However, as a result of the stealth design of the facility, the proposed CMRS facility does not strictly meet the setback requirements set forth in the Code. According to Sec. 146-605, Table 6.5, the height limitation in industrial zoning districts is 60 feet, unless the structure is within 200 feet of a residential zoned property. The edge of the monopine, i.e., the tips of the branches of the monopine, will be approximately 184 feet from the edge of the nearby residential zoned property. Accordingly, Eco-Site is simultaneously filing a letter requesting a waiver of the minor (less than 10%) deviation from the setback requirement in accordance with Section 146-405(G) of the Code.

- b. Whenever an antenna is attached to a building roof, the height of the antenna shall not be more than 15 feet beyond the height of the building. If the building is constructed to the height limit of the applicable zone district, an additional 15 feet of antenna height is permissible.

N/A.

- c. The height of a stealth CMRS facility in an open zone shall not exceed fifty (50) feet, unless a waiver is granted by planning commission or city council.

N/A.

7. Minimum setbacks for freestanding and stealth CMRS facilities:

- a. Freestanding and stealth facilities located adjacent to any property zoned for residential use: one foot for every foot of tower height.

As a result of the stealth design of the facility, the proposed CMRS facility does not strictly meet the setback requirements set forth in the Code. According to Sec. 146-605, Table 6.5, the height limitation in industrial zoning districts is 60 feet, unless the structure is within 200 feet of a residential zoned property. The edge of the monopine, i.e., the tips of the branches of the monopine, will be approximately 184 feet from the edge of the nearby residential zoned property. Accordingly, Eco-Site is simultaneously filing a letter requesting a waiver of this minor (less than 10%) deviation from the setback requirement.

- b. Freestanding and stealth facilities not located adjacent to property zoned for residential use: minimum setback in the underlying zone district for buildings or structures.

See response to 7.a. above. Otherwise, the proposed CMRS facility adheres to the side and rear setbacks of the PCZD Industrial zone.

- c. Freestanding and stealth facilities located adjacent to any existing or planned public right-of-way: one foot for every foot of tower height.

The proposed CRMS facility would be around 500 feet from the nearest public right-of-way and will only be 60 feet in height.

- (D) Schedule of Zone Districts. CMRS facilities shall be permitted as follows: [Table 12.1 has been omitted].

The proposed facility will be on an industrial zoned property and has been designed as a stealth facility. According to Table 12.1, the proposed facility should receive an administrative review, however, for the reasons described above, the applicant is requesting a waiver of the setback requirements in accordance with Section 146-405(G) of the Code.

- (E) Application and Approval Procedures.

1. Site Plan. An application for freestanding facilities shall be submitted with a site plan in conformance with the requirements of this chapter. If required, the planning commission shall conduct a public hearing on the proposed plan to determine if the plan conforms to the provisions of this section. The city shall make reasonable efforts to approve or deny all applications within ninety (90) calendar days after receiving a complete application. A decision of the planning commission may be appealed according to the procedures in this chapter.

No comment necessary.

2. Administrative Approval. An application for administrative approval shall be submitted in conformance with the submittal requirements as adopted by the director of planning, who shall review the application for conformity with the requirements of this section. The director shall render a decision within 30 calendar days of submittal of a complete application or the application will be deemed approved. A decision of the director may be appealed according to the procedures in this chapter.

No comment necessary.

3. Temporary CMRS facilities (also known as cell on wheels) shall not be erected at any location without approval by the city manager of a temporary use permit pursuant to section 146-207 of this Code.

N.A.

- (F) Decision. Any decision to deny a request to place, construct, or modify personal wireless service facilities shall be in writing and supported by substantial evidence contained in a written record.

No comment necessary.

(G) Co-location.

1. A maximum of two providers' visible panel antenna arrays is permitted on any one freestanding structure. However, visible whip antennae may be maintained for a third and fourth co-locator. A third provider's visible panel antenna array may be permitted if it is determined through plan review that the addition of the third array is compatible with the surrounding buildings and existing or planned uses in the area. Each CMRS provider possessing visible panel antenna arrays on a freestanding facility may also operate one microwave dish on the freestanding facility not to exceed 48 inches in diameter.

The applicant will adhere to the requirements of this section. The proposed CMRS facility has been designed to accommodate up to three wireless carriers.

2. No CMRS facility owner or lessee or employee thereof shall act to exclude or attempt to exclude any other CMRS provider from the same location. A CMRS facility owner or lessee or employee thereof shall cooperate in good faith to achieve co-location of antennae with other CMRS providers.

The applicant will adhere to the requirements of this section.

(H) Removal and Notification of Decommission.

1. Any CMRS facility that ceases to be used for CMRS purposes shall be removed from its site by the CMRS operator or operators that ceased to utilize the facility or, alternatively, by the land owner, not later than one hundred eighty (180) days after such cessation.

The applicant will adhere to the requirements of this section.

2. A CMRS operator shall notify the planning department at the time the FCC is notified of a decommissioned site.

The applicant will adhere to the requirements of this section.

For all of the above reasons, the proposed telecommunications facility complies with the requirements of Code. Eco-Site requests the City approve the application for this proposed wireless facility.

Best regards,



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**Exhibit 1**

**Original T-Mobile Search Ring**

