

To: Town of Boulder Planning Commission
From: SAC Wireless, Agent of Commnet on behalf of AT&T
RE: CUP Application for CommNet D&S -- 155 E 0300 N, Boulder, UT 84716

--Project Narrative--
Commnet D&S – MRUTH037696 – Boulder
Jurisdiction: Town of Boulder
155 E 0300 N, Boulder, UT 84716
Parcel Number: 02-0005-0248

Description of Proposed Use

The FirstNet Network

Commnet Four Corners is currently working in partnership with AT&T and the First Responder Network Authority to provide the nation's first-ever high-speed nationwide wireless broadband network dedicated to federal, state, and local first responders. The FirstNet network will provide first responders with priority access to wireless communications services on a single nationwide network, enabling increased coordination among first responder agencies and decreased response times throughout the country.

Through its partnership with the First Responder Network Authority and AT&T, Commnet is responsible for building and upgrading various AT&T cellular sites in Boulder. As part of this project, Commnet is currently proposing to replace the existing 30 foot pole with a new improved 55 foot pole to the existing telecommunications facility located at 155 E 0300 N, Boulder, UT 84716 (parcel number: 02-0005-0248). As part of project, Commnet is proposing to install the following: one (1) 55' monopole, two (2) proposed panel antennas, four (4) radios, one (1) antenna collar mounts with sector frames, cabling, one (1) 2-Bay Equipment Cabinet, one (1) ice bridge, (1) concrete pad, one (1) H-Frame, and one (1) Fiber Box. Please see sheet A-1.2 to see the proposed site plan.

Commnet proposes the following modifications to the existing site:

- 1) The removal and replacement of the existing 30' Self-Support Tower, for a new 55' Monopole on a new concrete footing. All other carriers existing equipment to be relocated to new Monopole.
- 2) Install a new collocation to new proposed facility.
- 3) The installation of a new 8' x 9'6" concrete equipment pad, as well as a new H-Frame and Ice Bridge.
- 4) Planting of (5) Mastic Trees and (18) Bluestar Juniper Shrubs.

ANTENNAS: One sector would consist of two (2) panel antennas. See page A-2.1, "Proposed Antenna & Equipment Plans," of the drawings submitted with this application for reference to the antenna layout. The antennas will be mounted at a RAD center of 39' on the sector mount of the new pole. Cabling will be routed through the new monopole to the cabinet equipment.

CABINETS: Commnet proposes installing one (1) Delta 2-Bay equipment cabinet on a new 8' x 9'6" concrete pad located south of the proposed Monopole. The dimensions and model information can be found on page A-4.3 of the attached plans. The layout of the new equipment will be installed per plans, according to page A-2.0, "Proposed Antenna & Equipment Plans".

Addendum to Application for Conditional Use Permit

Below are the Section 803 requirements from the currently adopted local Zoning Ordinance, and a written explanation detailing how each is satisfied for this Application for Conditional Use. Attached to this project narrative is a set of maps and drawings that provide the data required in the ordinance. These drawings are referenced throughout. All included documentation is submitted for the purpose of describing the layout, use, and construction method for which to obtain the required conditional

use permit. The design and engineering for the project will be developed according to the currently adopted building codes and permitting process for which the jurisdiction requires.

Section 1021 Wireless Communication Towers and Facilities

1. Requirements for facility permit submissions:

- A. A conditional use permit is required. In addition to any other materials required for a standard permit under this section or any other Town ordinances, all applicants for permits to construct a telecommunications tower or antenna shall submit visual impact demonstrations using photo simulations of the proposed facility as it would be seen from residential areas, public rights of way, and public parks and other sites as deemed appropriate by the Planning Department.

Applicant Response: Please see attached photosimulations of the proposed project. Commnet is proposing to replace an existing telecommunication self-support lattice tower with a monopole.

- a. Weight may be given in favor of the application if the applicant is able to demonstrate a net benefit to the community and its residents for increased cell service and/or other desirable communications capacities and capabilities.

Applicant Response: Commnet is working in partnership with AT&T and the First Responder Authority Network to provide the nation's first ever high-speed nationwide wireless broadband network dedicated to federal, state, and local first responders. The Firstnet network will provide first responders with priority access to wireless communications services on a single nationwide network, enabling increased coordination among first responder agencies and decreased response times throughout the country. The State of Utah has chosen to opt in to use this network making it available to communities throughout the state including Boulder.

As part of our project, Commnet is proposing to replace the existing previously approved lattice tower, with a more structurally capable pole to collocate Firstnet and additional future carriers, which will improve service within the area.

Furthermore, we believe, the collocation of Firstnet will benefit the community and First Responders within Boulder by providing a faster and more secure network that will improve E911 services, faster point to point data transfers of as it relates to mapping, medical records, and environmental information.

2. Location of facilities at or near the center of Town, on mesa tops, or highly visible from scenic corridors such as State Highway 12.

- A. Towers and antennae may be approved at or near the center of Town, on mesa tops, and in designated scenic corridors by special exception if possible concealed so as to be substantially invisible. The views of, and vistas from, such areas and corridors shall not be impaired or diminished by the placement of telecommunication towers and antennae.

Applicant Response: We believe replacing the current lattice tower with a slimmer monopole will improve the visual impact of the current facility and will not further impact Town views nor any scenic corridors. The new proposed pole will be slimmer, stronger, and have a smaller footprint. In addition to the project, Commnet is proposing to install landscape screening using trees and bushes that will minimize the visual impact.

3. Height Restrictions

- A. No new telecommunication facility shall exceed fifty (5) feet in height over ground level directly below. Due to the wide variation in topographical features and remote locations sited away from Town center, residential areas, and State Highway 12, the Planning Commission has broad discretion in requiring the applicant to seek out locations an exhaust all reasonable options for siting the tower in the least impactful locations.

Applicant Response: The design team and Radio Frequency (RF) Engineers determined that in order to install Firstnet and maintain all other carriers, a 55' pole is needed within the attached search ring. Please see attached Search Ring

map. As part of project, RF engineers did review to see if there were other previously approved facilities within their search ring and no other facilities were found. We believe, as this site is previously approved by the Town, and has the necessary agreements in place along with existing infrastructure, our proposed project would provide the technological needs of all carriers in the Town. Furthermore, as the use is established, we believe the upgrade and modification is the least impactful to the Town and would ensure minimum towers in the town.

- B. Telecommunications facilities that simulate objects that typically occur in landscapes similar to the proposed location (except billboards, electrical transmission, or telecommunication towers) may exceed fifty (50) feet in height if, based on the judgement of the Planning Commission or body issuing the conditional use permit, it would appear in context on the landscape, is aesthetically acceptable, and would be a preferable alternative to an undisguised facility.

Applicant Response: Based on previous conversations prior to submitting, Planning indicated that a Flagpole or Tree pole is not preferred at this location. As part of project, we are proposing to camouflage the ground facility with landscaping. We believe that the slimmer pole design is less visually impactful than the current lattice tower. For the interest of the town, we believe a standard monopole is preferred so more carriers can collocate on to this facility and ensure minimum towers in the town. A stealth design would limit how many carriers can collocate.

- C. Telecommunications facilities located atop or within existing buildings or structures may result in an overall increase in height of the structure of no more than ten percent of the structure's height without the facility or the maximum height allowed in the zoning district in which the structure is located, whichever is less.

Applicant Response: This project is to upgrade and modify an existing free-standing telecommunication facility.

4. Co-location

- A. In all applications for construction of a new facility, the applicant must prove by substantial evidence that a bona fide need exists for the facility and that no reasonable combination of locations, techniques, or technologies will obviate the need. The applicant must further prove that it has made all reasonable efforts to procure antenna space on existing facilities and that the cost of co-location exceeds the cost of a new facility by at least fifty percent.

Applicant Response: Please see the attached search ring map. RF engineers determined that there are no other approved and registered facilities within the attached search ring that would be technologically feasible within the Firstnet's search ring. Based on this determination, Commnet's site Boulder is the best candidate.

- B. Prior to the issuance of a permit for a new tower, the applicant shall demonstrate commitment to joint use as follows.
- a. The applicant requesting the permit shall submit evidence to the city demonstrating that a genuine effort has been made to solicit additional users for the proposed new tower. Evidence of this shall include, at a minimum, copies of notices sent by registered mail, return receipt requested, to all other providers of cellular and wireless communications services within Garfield County and adjacent counties, advising of the intent to construct a new tower, identifying the location, inviting the joint use and sharing of costs, and requesting a written response within fifteen business days.

Applicant Response: As part of project, existing and proposed carriers will be collocated to proposed pole. There are also existing agreements already in place as well as existing infrastructure.

- b. The applicant shall sign an instrument, maintained by the city, agreeing to encourage and promote the joint use of telecommunications towers within the city and, to that extent, committing that there shall be no unreasonable act or omission that would have the effect of excluding, obstructing or delaying joint use of any tower where fair and just market reasonable compensation is offered for such use.

Applicant Response: Commnet understands the process and agrees to comply.

5. Setback

- A. No new tower shall be constructed without a setback from the tower's base of at least one and one-half (1.5) times the tower height to a public or private road and at least two and one-half (2.5) times the tower height to the nearest property line.

Applicant Response: The pole meets the setback requirements to the south. Per conversations with Planning, it was determined that relocating the pole to another location at parcel would not be preferred, therefore, we are proposing to replace and install pole at the exact same location as existing. Due to the size of parcel, we are requesting relief of this requirement. If in the very unlikely case the pole were to collapse, the pole will be designed and engineered to fall within the parcel.

6. Equipment shelters:

- A. No equipment shed for a telecommunications facility shall exceed seven hundred and fifty square feet in area nor twelve (12) feet in height. All such sheds shall be screened with vegetation or other aesthetically pleasing materials. Furthermore, all such sheds shall be secured with approved fencing and locked gate if deemed necessary by the Planning Commission.

Applicant Response: As part of project, Commnet is proposing to screen the ground facility using bushes and trees. Please see landscape plans.

7. Signs, lighting, and noise:

- A. No commercial messages nor any other signs beyond safety warnings and an identification sign of not greater than four (4) square feet shall be placed on any tower or facility, nor placed higher than five (5) feet above ground level. No lighting, or devices emitting noise, shall be placed or maintained on the tower or facility in a manner visible or audible offsite.

Applicant Response: Commnet understands the process and will comply.

8. Electronic emissions and electromagnetic radiation:

- A. Prior to commencing regular operation of the facility, all facility owners and operator must submit a certificate of compliance with all current Federal Communications Commission regulations concerning electromagnetic radiation and other electronic emissions applicable to the facility.

Applicant Response: Commnet understands the process and will comply.

- B. All Facility operators and owners must sign an agreement, to be maintained by the city, agreeing to bring facilities into compliance with any new federal, state, or local laws or regulations concerning electromagnetic radiation and other electronic emissions applicable to the facility within one hundred and twenty (120) days of the effective date of the regulations.

Applicant Response: Commnet understands the process and will comply.

9. Removal of facilities:

- A. The owner of a facility shall establish a ten thousand-dollar (\$10,000) cash security fund or provide the City with an irrevocable letter of credit in the same amount to secure the cost of removing an antenna, antenna array, or tower that has been abandoned. In the event of a transfer of ownership, the seller shall be responsible for notifying the buyer of this requirement and for notifying the Town of the transfer.

Applicant Response: Commnet understands the process and agrees to comply

Section 803, Site Development Plan Requirements

A Site Development Plan shall be required to accompany all Conditional Use Applications. The Site Development Plan shall provide the following:

- 1. A plan drawn to a scale identifying the location and dimension of the property and any existing buildings or other structures, and fence lines.

Applicant Response: Please See the attached drawings. These drawings include relevant maps and site plans locating the proposed facilities, existing building, and access drive on the property located at E 300 N Lower Boulder Rd.

2. A topographical map of the site identifying site features, as applicable, identifying areas of the site with greater than fifteen percent (15%) average slope and areas of the site with greater than thirty percent (30%) average slope with contour lines, at an interval of two (2) feet, and other features of the site, including but not limited to areas of natural vegetation, tree stands, water courses, drainage ways.

Applicant Response: Please see attached Topographic Site Survey performed by Tera Mark Land Surveying that identifies site features and counter lines at intervals of 2 feet. No grading will be required.

3. The location and dimension of all proposed buildings.

Applicant Response: Please see attached drawings produced by B+T group, sheet A.1.2 Site Plan. Commnet is proposing to replace the existing 30' lattice tower with a 55' monopole to collocate Firstnet, a dedicated network for First Responders. The proposed leased area for the collocation will be 247 square feet.

4. All proposed Off-Street parking areas including egress and ingress and including areas for Off Street parking during construction.

Applicant Response: The proposed modification is to an existing unmanned telecommunications facility. The existing access drive for the property, shown on sheet A-1 Site Plan, will serve as ingress and egress for the facility during and after construction as well as a stabilized construction entrance made of crushed stone. Please see attached Storm Water Plans for details.

5. The location of roads and utilities that are now serving the site or will be required to serve the site.

Applicant Response: Please see attached sheets A-1 "Site Plan" and A-1.1 "Site Plan", which shows the existing access roads and utilities. Please see attached sheets A-1.2 "Site Plan" and A-2.0 "Proposed Antenna and Equipment Plans (Firstnet) that shows existing and proposed utility service.

6. A Storm Water Plan.

Applicant Response: Please see attached sheet C-1 "Stormwater / Erosion Control Plan". During construction, a silt fence will be constructed to prevent any runoff. No changes to existing drainage will be required.

7. A Landscape Plan identifying the treatments, including type and number of plant materials proposed for all areas not occupied by buildings and parking and identifying proposed screening and buffering treatments and a calculation of the amount of pervious and impervious area.

Applicant Response: Please see attached sheets L-1 "Landscape Plan" and L-2 "Landscape Details". Commnet is proposing to plant a mixture of trees and shrubs along the southwestern parcel lines to buffer any sight angles to the telecommunication facility.

8. A Construction Plan identifying the phases of construction, a construction schedule, and a list of all permits necessary for the proposed use.

Application Response: The phases of construction will be 1) Site Preparation, 2) Removal of existing lattice tower and relocate existing equipment using a cell on wheels (C.O.W). 3) Construction of the new facility, 2) Relocation of existing and proposed carrier equipment to new tower, 3) Electrical and ground. All design work will strictly adhere to the currently adopted construction codes.

9. A Service Impact Assessment which shall include, but not be limited to, identifying requirements for Culinary Water, Sanitary Sewer, and anticipated traffic volumes, proposed accesses, and Utah Department of Transportation requirements and permits, as applicable.

Applicant Response:

- CULINARY WATER: The proposed site is an unmanned telecommunications facility. The provision of culinary water is unaffected by this modification.
- SANITARY SEWER. The proposed site is an unmanned telecommunications facility. The provision of sanitary sewer is unaffected by this modification.
- TRAFFIC: The anticipated traffic and access required will remain unchanged by this modification. See the attached site plan for the existing ingress/egress details for the property.
- Please see existing and proposed coverage improvements as part of project.
- Site will be built to the standards as required by the 2018 Utah Building Codes with amendments.

10. Building Plans and Signs. The proposed material and colors of all exterior building facades shall be identified as well as all proposed site signage including the height and size of all signs. All signage must comply with the requirements of Section 1018 of this Ordinance.

Applicant Response: Color and texture of all painted surfaces shall match existing adjacent surfaces unless otherwise noted. See attached drawings for all design and material details. No new signage is proposed as part of this facility modification.

11. Commercial Site Plans as required under Section 1013(1).

Applicant Response: All relevant provisions thereof have been addressed through the provisions of Section 803 above and the accompanying exhibits and materials.

Anticipated Impacts

As this is an unmanned facility, the site will not generate excessive traffic; will not cause any noise, air, light or water pollution. No noise, lights, dust or vibrations will be generated. Screening has been taken into consideration in project design and is reflected so in the plans. The visual impact to the adjoining properties will not be significantly altered by the replacement pole or the new antennas and equipment due to the proposed concealment features.

Radiofrequency emissions will be within applicable Federal Communications Commission (FCC) guidelines. The replacement of the pole is functionally equivalent to the existing pole and meets the limitation requirements.

Other Information

If you have any further questions or comments concerning this application, please feel free to contact me at 312-858-6546, or via email at: cynthia.vandemark@sacw.com. I thank you in advance for your kind courtesies and attention with respect to this application.