



**COMMUNITY AND ECONOMIC DEVELOPMENT
DEPARTMENT**

CASE NO.: RCU2017-00039

CASE NAME: AMERICAN TOWERS

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**COMMUNITY AND ECONOMIC DEVELOPMENT
DEPARTMENT
STAFF REPORT**

Board of County Commissioners

July 3, 2018

CASE No.: **RCU2017-00039**

CASE NAME: **American Towers**

Owner's Name:	Aurora Highlands, LLC.
Applicant's Name:	American Towers, LLC. (Liz Walker)
Applicant's Address:	10 Presidential Way, Woburn, MA 01801
Location of Request:	23700 E. 42 ND Ave.
Nature of Request:	A conditional use permit to allow a commercial telecommunications tower on the property
Zone Districts:	Agriculture-2 (A-2)
Comprehensive Plan:	Urban Residential
Site Size:	0.037 acre (1,635 square foot) portion of a 9.5 acre parcel
Proposed Uses:	Telecommunications Tower
Existing Use:	Residential
Hearing Date(s):	PC: June 14, 2018 / 6:00 p.m.
	BOCC: July 3, 2018 /9:30 a.m.
Hearing Location:	4430 S. Adams County Parkway, Brighton, CO 80601 / Public Hearing Room 1st Floor
Report Date:	June 19, 2018
Case Manager:	Emily Collins <i>EAC</i>
Staff Recommendation:	Continuance to July 12, 2018
PC Recommendation:	Continuance to July 12, 2018

BOCC UPDATE

The Planning Commission (PC) considered this case on June 14, 2018 and continued it to their July 12th public hearing meeting. At the PC hearing, the property owner of the parent parcel surrounding the lease area of the proposed telecommunication tower informed the PC that the entire property is currently under review for it to be annexed into the City of Aurora. This annexation process is scheduled for a final hearing on July 9, 2018. The property owner of the

parent parcel requested the PC to deny the request as the telecommunication tower is not compatible with planned development of the area. There was a representative from the applicant at the meeting who informed the PC that the tower had been on the property for over 26 years and the property owner was aware of the location of the tower prior to purchasing it. In addition, the applicant had made several efforts to work with the owner of the parent parcel, but have been unsuccessful. After the public hearing, the PC decided to continue the case until July 12, 2018 and wait for a final decision on the annexation review. Staff informed the PC that the County will not have jurisdiction to review the application once the annexation is completed, and the PC did not have any concerns with the inability to review the application again.

SUMMARY OF PREVIOUS APPLICATIONS

On May 18, 1972, the Board of County Commissioners (BoCC) approved the Swain Subdivision which included the subject property.

On November 4, 1991, the Board of County Commissioners approved a conditional use permit to allow a fifty foot tall commercial telecommunications tower on the property. This permit was granted for ten years.

On October 1, 2007, the BoCC approved a conditional use permit to extend the expiration date for the existing tower for an additional ten years, expiring on October 1, 2017.

SUMMARY OF APPLICATION

Background

American Towers, LLC, the applicant, is requesting to renew the conditional use permit (CUP) to allow the existing commercial telecommunications tower to remain on the property. The tower is fifty (50) foot tall with associated equipment shelter and located on 0.037 acres of a 9.5 acre property. There is a permanent easement recorded for the lease area of the existing tower. There are two carriers currently co-located on the tower.

Site Characteristics:

The property is located east of Gun Club Road and south of E. 42nd Avenue and surrounded by the municipal boundaries of the City of Aurora to the north, south, east, and west. There is a master planned residential and commercial mixed-use development (Aurora Highlands) proposed on these surrounding properties. The proposed surrounding developments are currently under review by the City of Aurora. In reviewing the subject request, the City of Aurora informed the County of their intention to annex the subject property with the goal of it being developed with uses consistent with the master plan for the area.

Currently, the property is developed with an existing single-family dwelling which was built in 1972. The subject site has access on E. 42nd Avenue via a private easement.

Development Standards and Regulations Requirements:

Per Section 3-07-01 of the Adams County Development Standards and Regulations, a conditional use permit is required for a commercial telecommunications tower in the A-2 zone district. Section 4-09-02-07 of the County's Development Standards and Regulations outlines design and performance standards for telecommunication facilities. These standards include maximum height, landscaping and screening, setbacks from property lines, separation from other freestanding facilities, and setbacks from residential uses. The elevation plan, provided with the application, show the existing tower is 50 feet in height. The maximum height allowed in the A-2 zone district for dwellings and accessory structures is thirty-five (35) feet; however, the Board of County Commissioners, through the conditional use permit, may grant an exception to the height of the telecommunication tower to exceed the maximum height allowed in the zone district. The previous conditional use permit was approved to allow the height of the tower to be 50 feet. There are no proposed changes to the height.

Per Section 4-09-02-07(3) of the County's Development Standards and Regulations, freestanding telecommunication towers shall not be located closer than the height of the tower from any property line. The proposed telecommunication tower is setback 53 feet from the nearest property line to the east and 112 feet from the northern property line abutting E. 42nd Avenue, thus conforming to the required setback standards.

Landscaping is required to screen the telecommunication tower as outlined in Section 4-09-02-07(3)(b) of the County's Development Standards and Regulations. The landscape plan provided with the application also shows a proposed installation of thirty-five (35) evergreen trees and shrubs along the exterior portions of the tower structure. This is to enhance aesthetic view of the tower and its surroundings. The proposed landscape plan conforms to the County's requirements outlined in Section 4-09-02-07(3) of the Development Standards and Regulations. The site plan submitted also shows all equipment associated with the telecommunication tower will be located and enclosed behind a new six-foot concrete masonry wall. The lease area for the tower is currently enclosed by a chain link fence which does not comply with the County's current screening requirements; however, the proposed concrete masonry wall does comply with County requirements.

Section 4-09-02-07(3)(d) of the County's Development Standards and Regulations requires telecommunication towers to be located no closer than 1,000 feet from the nearest telecommunications tower. From information submitted by the applicant, the proposed location conforms to the County's spacing requirement. In addition, the applicant has provided coverage maps of the area to demonstrate the need for the existing tower (See Exhibit 3.3).

Future Land Use Designation/Goals of the Comp-Plan for the Area

The future land use designation on the property is Urban Residential. Per Chapter 5 of the County's Comprehensive Plan, the Urban Residential designated areas are intended to provide a variety of housing types, and create and maintain healthy residential neighborhoods. Primary uses in the Urban Residential future land use designation are single and multiple-family housing developed at densities of one dwelling unit per acre or greater. All of the surrounding properties to the north, south, east, and west of the subject property are within the jurisdiction of the City of Aurora and are currently undeveloped.

During the referral review of the subject request, the City of Aurora informed the County that the City intends to annex the property and the property owner of the land surrounding the easement area, Aurora Highlands, LLC, is currently in the process of obtaining development approvals from the City for a master planned community development. Therefore, the City is opposed to the request to renew the conditional use permit as location of the telecommunication tower is incompatible with the proposed development plans for the area. The surrounding area to the subject site is within the City's E-470 Corridor District which is intended to provide for high-quality economic development and new neighborhoods. This corridor is expected to contain approximately 70 percent of the City's future population growth. The corridor plan also designates several regional activity centers which are intended for intensive, mixed-use developments.

Per Chapter 3 of the Adams County Comprehensive Plan, specifically Policy 2.1, in administering land use and development policies, the County is to consider the growth area of each Adams County municipality and promote development in a manner that supports those municipalities land use plan and goals to avoid interjurisdictional competition. The County is to also coordinate with affected municipalities on development proposals located within municipal growth areas. Further, the County is to continue to engage each impacted municipality as a referral source for comments and review of proposed developments and give careful considerations to affected municipalities input. Policy 2.1.b of the Adams County Comprehensive Plan encourages annexation if a municipality demonstrates the intent and ability to provide municipal services to a development area in the near future. The City of Aurora has informed the County that the property is currently undergoing annexation and planned to be completed by July of this year. Therefore, recommends that any proposed request for development on the property must conform to the City's development plans for the area.

The request to develop the property for a telecommunications tower is inconsistent with the County's Comprehensive Plan and policy for coordinating with the County's municipalities and their growth areas. Specifically, the property owner of the parent parcel is currently pursuing annexation of the property and plans for it to be developed in unison with a master plan for the area. Because of the proposed annexation and the City of Aurora future development plan for the area, staff is recommending a two-year conditional use approval to allow the telecommunication tower on the property. The two year time limit will allow continued use of the telecommunication tower and also time for the applicant to discuss alternative locations with the property owner of the larger parcel and City of Aurora while the City completes annexation of the property.

Surrounding Zoning Designations and Existing Use Activity:

Northwest Aurora Vacant	North Aurora Vacant	Northeast Aurora Vacant
West Aurora Vacant	Subject Property A-2 Residential	East Aurora Vacant
Southwest	South	Southeast

Aurora Vacant	Aurora Vacant	Aurora Vacant
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Compatibility with the Surrounding Land Uses:

A majority of the surrounding properties to the site are located within the City of Aurora, with a zoning designation of E-470 and North East Plains Sub-Areas. The surrounding area is also within the Colorado Aerotropolis and Denver International Airport (DIA) Transit Corridor. Although the existing telecommunications tower is currently under the jurisdiction of Adams County, the tower complies with the city of Aurora's height and setback requirement for freestanding communications towers. The City's requirements include a maximum height of 60 for properties located in the E-470 Medium Density Residential Zoning District and a setback of one foot for every foot of the tower from any property zoned for residential use or public right-of-ways. The existing tower is setback approximately 112 feet from E. 42nd Avenue and 53 feet from the eastern property line; and conforms to the City's standards.

Staff Recommendations:

Based upon the application, the criteria for approval of a conditional use permit outlined in Section 2-02-08-06 of the County's Development Standards, the County's Comprehensive Plan, and a recent site visit, staff recommends approval of the request with 8 findings-of-fact and 4 conditions.

Findings-of-Fact

1. The conditional use is permitted in the applicable zone district.
2. The conditional use is consistent with the purposes of these standards and regulations.
3. The conditional use will comply with the requirements of these standards and regulations, including but not limited to, all applicable performance standards.
4. The conditional use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and the County.
5. The conditional use permit has addressed all off-site impacts.
6. The site is suitable for the proposed conditional use including adequate usable space, adequate access, and no presence of environmental constraints.
7. The site plan for the proposed conditional use will provide the most convenient and functional use of the lot including the parking scheme, traffic circulation, open space, fencing, screening, landscaping, signage, and lighting.
8. Sewer, water, storm water drainage, fire protection, police protection, and roads are available and adequate to serve the needs of the conditional use as designed and proposed.

Recommended Conditions:

1. The conditional use permit shall expire on July 3, 2020.
2. The applicant shall install the landscape and screen fencing as shown on the final site plan submitted with the application and approved by the BoCC. Installation of the landscape and screen fencing shall be completed within 60 days of approval by the Board of County

Commissioners. The applicant shall request an inspection for the required landscape and screen fence requirements from the Community and Economic Development Department after installation is completed.

3. The height of the freestanding telecommunications tower shall not exceed 50 feet.
4. Any telecommunications facility that ceases to be in operation for a consecutive period of six months or more shall be removed from the site within 90 days of the end of such period of non-use.

PUBLIC COMMENTS

Property Owners Notified	Number of Responses
6	1

Staff sent notices to property owners and residents within one-half mile radius of the subject request and received one letter in opposition. This letter in opposition was sent by the property owner and developer of the proposed Aurora Highlands master planned community. The property owner stated that renewal of the existing tower would impede future plans for development of the area as a mixed-use commercial and residential community.

REFERRAL AGENCY COMMENTS

Responding with Concerns:

The City of Aurora is opposed to the conditional use permit application. The City stated that the property will be annexed and the proposed request is incompatible with intended future development of the area.

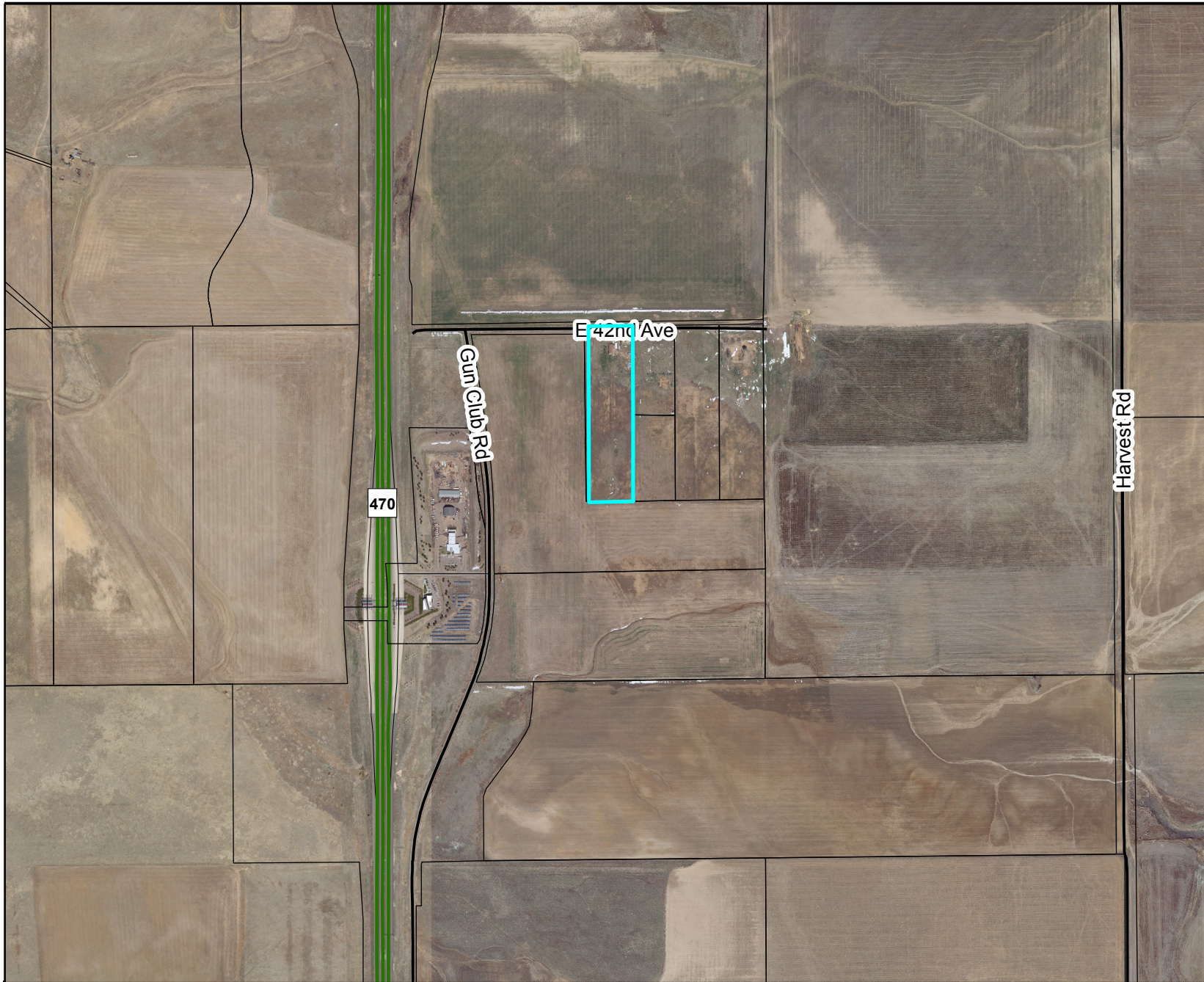
Xcel Energy and the Federal Aviation Administration review the request and had no concerns.

Responding without Concerns:

Federal Aviation Administration
Xcel

Notified but not Responding / Considered a Favorable Response:

Adams Arapahoe School District 28J
Century Link
Comcast
Denver International Airport
First Crekk Ranch Metropolitan Distirct
Sable Altura Fire District
Tri-County Health Department



LEGEND

★ Special Zoning Conditions

3 Section Numbers

— Railroad

— Major Water

— Zoning Line

Sections

Zoning Districts

A-1

A-2

A-3

R-E

R-1-A

R-1-C

R-2

R-3

R-4

M-H

C-0

C-1

C-2

C-3

C-4

C-5

I-1

I-2

I-3

CO

PL

AV

DIA

P-U-D

P-U-D(P)

Airport Noise Overlay



ADAMS COUNTY
COLORADO

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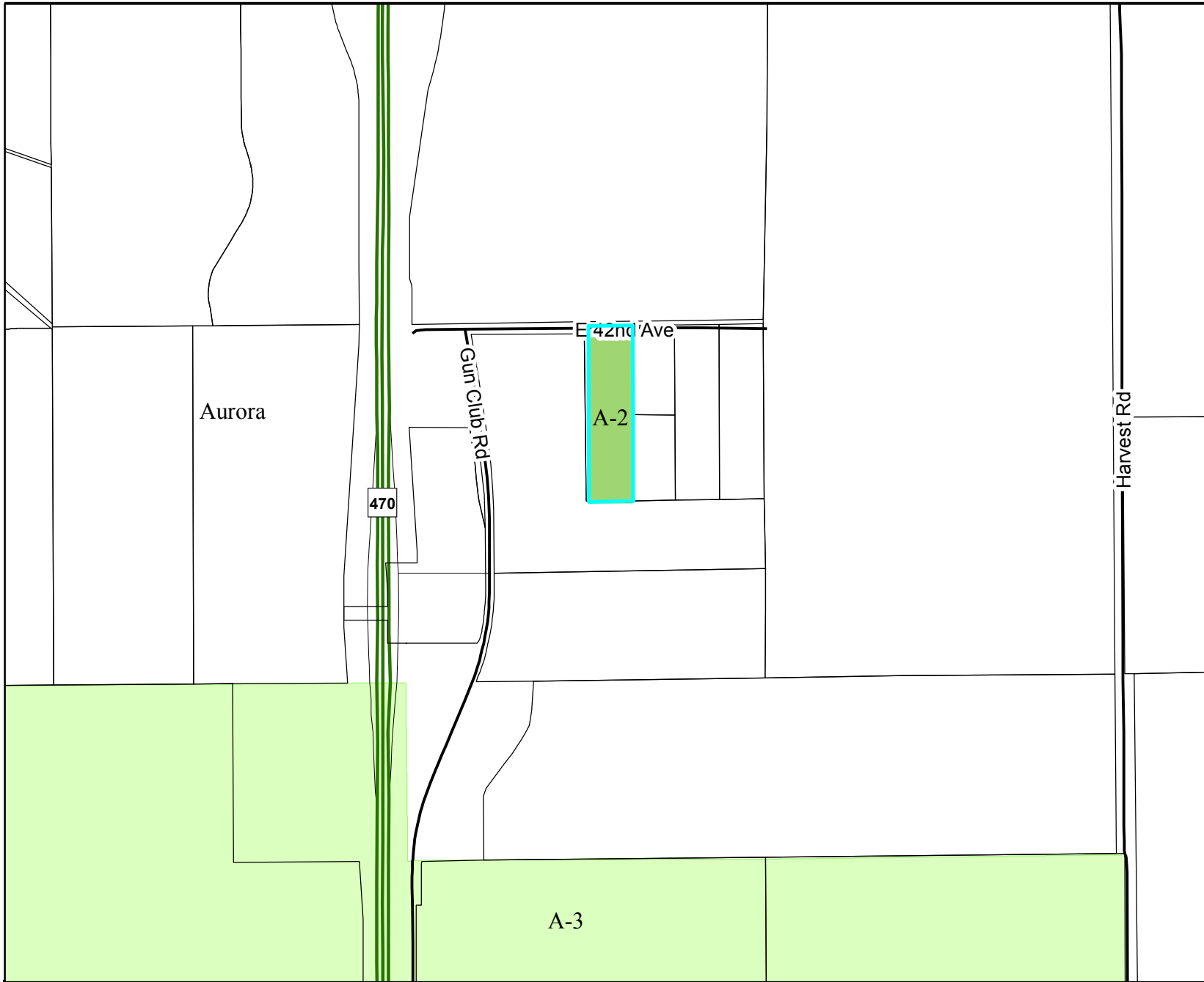
RCU2017-00039

Exhibit 2.1

American Towers



For display purposes only.



LEGEND

★ Special Zoning Conditions

3 Section Numbers

— Railroad

— Major Water

--- Zoning Line

□ Sections

Zoning Districts

A-1

A-2

A-3

R-E

R-1-A

R-1-C

R-2

R-3

R-4

M-H

C-0

C-1

C-2

C-3

C-4

C-5

I-1

I-2

I-3

CO

PL

AV

DIA

P-U-D

P-U-D(P)

□ Airport Noise Overlay



ADAMS COUNTY
COLORADO

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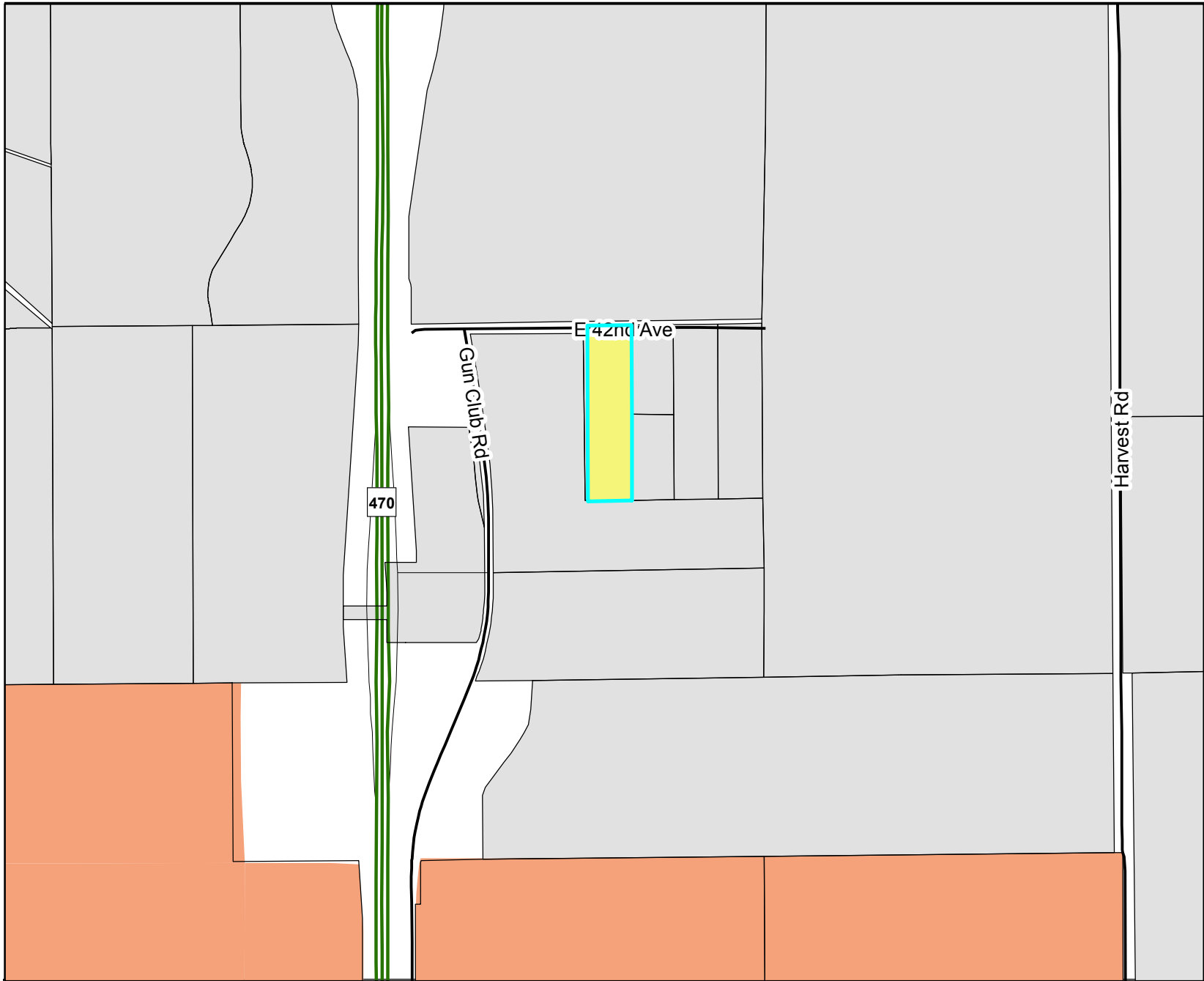
RCU2017-00039

American Towers

Exhibit 2.2



For display purposes only.



LEGEND

Special Zoning Conditions

Section Numbers

Railroad

Major Water

Zoning Line

Sections

Zoning Districts

A-1

A-2

A-3

R-E

R-1-A

R-1-C

R-2

R-3

R-4

M-H

C-0

C-1

C-2

C-3

C-4

C-5

I-1

I-2

I-3

CO

PL

AV

DIA

P-U-D

P-U-D(P)

Airport Noise Overlay

RCU2017-00039

Exhibit 2.3

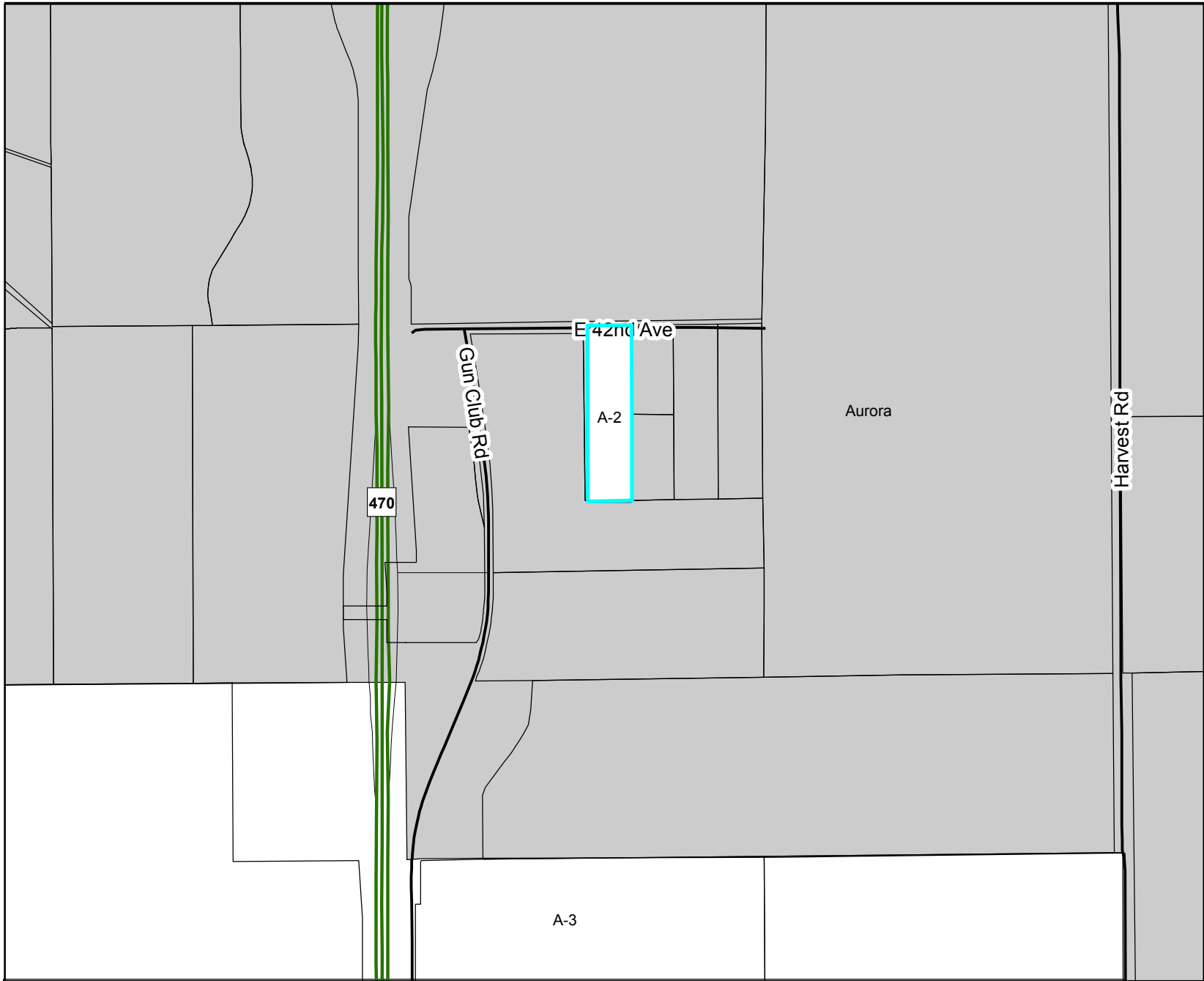
American Towers



For display purposes only.



This map is made possible by the Adams County GIS group, which assumes no responsibility for its accuracy



LEGEND

★ Special Zoning Conditions

3 Section Numbers

— Railroad

— Major Water

— Zoning Line

Sections

Zoning Districts

A-1

A-2

A-3

R-E

R-1-A

R-1-C

R-2

R-3

R-4

M-H

C-0

C-1

C-2

C-3

C-4

C-5

I-1

I-2

I-3

CO

PL

AV

DIA

P-U-D

P-U-D(P)

Airport Noise Overlay



ADAMS COUNTY
COLORADO

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RCU2017-00039

American Towers

Exhibit 2.4



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Written Explanation of Request
RENEWAL APPLICATION FOR COMMERCIAL TELECOMMUNICATIONS TOWER
Adams County RCU2007-00030

Submitted to Adams County, Colorado
Department of Planning & Development
September 13, 2017

1. GENERAL INFORMATION

Applicant: American Tower Asset Sub, LLC
Attn: Bonnie Belair, Attorney
10 Presidential Way
Woburn, MA 01801
Bonnie.Belair@AmericanTower.com

Representative: Wireless Policy Group LLC
Contact: Liz Walker
303-264-7455

Property Owner: Aurora Highlands LLC

Site Address: 23700 East 42nd Avenue, Aurora, CO

APN: 0181900001001

Zoning Classification: Agricultural 2 (A-2 Zone District)

Wireless Policy Group LLC is submitting this application on behalf of American Towers, LLC (the “Applicant”). *See attached Letter of Authorization.*

2. INTRODUCTION

The Applicant submits this request to renew the Conditional Use Permit (CUP) for an existing Commercial Mobile Radio Service (CMRS) Telecommunications Site (“**the Facility**”) at 23700 E. 42nd Avenue in Adams County. The Facility is necessary to continue filling a significant gap in wireless telephone and data service in this area, and to support seamless coverage in the co-locating carriers’ greater wireless networks. The Applicant requests that the CUP be renewed for a 10-year term.

Adams County Board of County Commissioners initially approved the site in November of 1991, and approved a subsequent renewal in October of 2007. No modifications to the existing tower, as previously permitted, are proposed in this renewal request. *See attached Site Plan.*

This proposal meets all of the Adams County criteria for renewing a CUP, and the Applicant respectfully requests that Adams County approve the renewal for a 10-year term, with no new conditions of approval.

3. BACKGROUND INFORMATION

3.1 The Existing WCF

The existing Facility, comprised of a 50-foot tall monopole and an equipment shelter in an easement area of approximately 1636 square feet. The Property is in an A-2 Zone District. The Facility currently accommodates co-location of two telecommunications carriers.

3.2 Prior Zoning Approvals

The Board of County Commissioners of Adams County (BoCC) originally approved the CUP for the existing Telecom Site pursuant to case number 101-91-C. That CUP was valid for a term of 10 years. The facility was designed, constructed and has operated in accord with the contemporaneous design requirements and performance standards, and the original conditions of approval, including a condition that the facility provide for co-location.

In 2007, the BoCC approved a renewal of the CUP extending the term of the permit an additional 10 years under Case No. RCW2007-00030. The Facility continues to operate in accord with Adams County code requirements and accommodates co-location of two telecommunications carriers.

3.3 Network Information

Carriers consider the coverage provided by existing CMRS telecommunication sites, such as the one at this location, when installing complementary facilities to strengthen their networks. The subject Facility is now an essential part of the Adams County regional wireless network.

Generally, the need for wireless service is determined by market demand, coverage requirements for a specific geographic area, and the need to provide continuous coverage from one site to another in a particular geographic region. A CUP renewal in this case would allow continued wireless communications service in this area. This includes emergency 911 calls throughout Adams County.

3.4 Applicable Law

Federal, state and local laws will apply to this application.

The federal Telecommunications Act acknowledges a local jurisdiction's zoning authority over wireless facilities, but limits the exercise of that authority in several important ways. First, a local regulation may not prohibit, or have the effect of prohibiting, the provision of wireless services. 47 U.S.C. Section 332(c)(7)(A) and -(B)(i)(II).

Also under the Telecommunications Act, a jurisdiction is prohibited from considering the environmental effects of radio frequency emissions (including health effects) of the WCF site if the site will operate in compliance with federal regulations. 47 U.S.C. Section 332(c)(7)(B)(iv). The Facility does now, and would continue to, operate in accordance with the Federal Communications Commission's Radio Frequency emissions regulations. Therefore, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the WCF site should be disregarded in this proceeding.

Additionally, just as the jurisdiction may not consider the environmental effects of radio frequency emissions, it also may not discriminate amongst providers of functionally equivalent services. A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers' applications for similarly situated facilities.

Finally, the Telecommunications Act requires local jurisdictions to act upon applications for wireless communications sites within a "reasonable" period of time.

Under the Adams County Development Standards and Regulations (the Code), an application for CUP renewal is subject to limited Conditional Use Permit Review Procedures under Code Section 2-02-08-04 and -05, including notice, public hearing and a decision by the BoCC. The Adams County criteria governing CUP Criteria for Approval (Code Section 2-02-08-06) are specifically addressed below.

4. APPLICATION SUBMITTAL REQUIREMENTS

This renewal application complies with all requirements of the Adams Code CUP Criteria for Approval, which are addressed directly below.

Chapter 2 ~~0~~ Application and Permitting Procedures Specific Development Review Steps for Development Applications

2-02-08-06 Conditional Use Permit ~~0~~ Criteria for Approval

The Planning Commission, in making their recommendation, and the Board of County Commissioners, in approving a conditional use permit, shall find:

1. The conditional use is permitted in the applicable zone district.

RESPONSE: The Facility is in an Agricultural-2 District (A-2). Per the Use Chart at Section 3-07-01 Telecommunications/Commercial Communications Towers are allowed in an A-2 Zone District with a Conditional Use Permit.

2. The conditional use is consistent with the purposes of these standards and regulations.

RESPONSE: Per Section 3-08-04-04, Communications Towers are a conditional use in this zone district.

The existing Telecom Site has been at its location in an A-2 district for 25 years and was previously found to be consistent with the purposes of these standards and regulations.

Per Section 2-02-08-01,

"Conditional uses are those which are presumptively compatible with other land uses authorized or permitted in a zone district, but, if approved, which require more discretionary review than those uses which are authorized [outright]."

The Adams County Code categorizes Telecommunications Towers as presumptively compatible with the other land uses authorized in an A-2 zone. The existing Tower has been subject to 2 prior discretionary review processes and was approved subject to conditions.

The Applicant has provided all required documentation as listed on the CUP Checklist and agreed to by Adams County Planning. See CUP Checklist and attachment lists.

3. The conditional use will comply with the requirements of these standards and regulations including, but not limited to, all applicable performance standards.

RESPONSE: The Tower was designed and constructed, and has operated, in accord with the design requirements and performance standards applicable to the 2007 CUP approval. No modifications beyond the carriers' respective antenna and equipment upgrades have been made to the design or operation of the Tower. See attached Site Plan.

4. The conditional use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and the County. In making this determination, the Planning Commission and the Board of County Commissioners shall find, at a minimum, that the conditional use will not result in excessive traffic generation, noise, vibration, dust, glare, heat, smoke, fumes, gas, odors, or inappropriate hours of operation.

RESPONSE: The existing Tower is compatible with the surrounding area and fits in with the character of the surrounding uses. The Tower has been at its location for over 25 years. To Applicant's knowledge, there have no complaints about noise, vibration, dust, glare, heat, smoke, fumes, gas, odors, or inappropriate hours of operation relating to the Tower or the associated equipment. The Tower operates in accordance with FCC radio frequency emissions regulations.

The Tower does not generate any significant traffic because it is an unmanned facility and requires only periodic maintenance visits by carrier personnel.

5. The conditional use permit has addressed all off-site impacts.

RESPONSE: The site has a critical impact in supporting the communications infrastructure in the area.

6. The site is suitable for the conditional use including adequate usable space, adequate access, and absence of environmental constraints.

RESPONSE: The site has been adequate for the operation and maintenance of the Tower for 25 years.

7. The site plan for the proposed conditional use will provide the most convenient and functional use of the lot including the parking scheme, traffic circulation, open space, fencing, screening, landscaping, signage, and lighting.

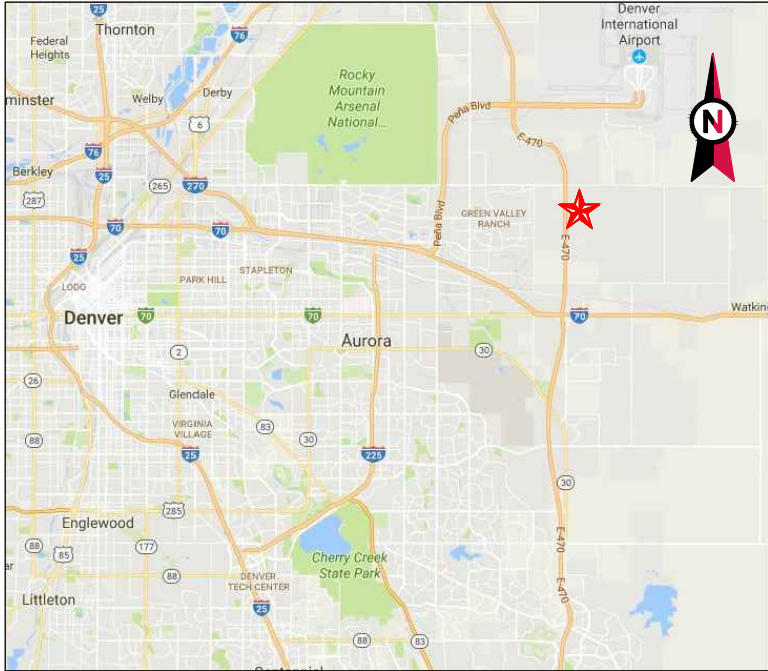
RESPONSE: The site, as designed and constructed, has shown to be the most convenient and functional use of the lot. The parking scheme and traffic circulation are more than adequate, as there is rarely more than one maintenance vehicle serving the Tower at a time. Fencing, screening, landscaping, signage, and lighting were designed and constructed in accord with Adams County code requirements.

- 8. Sewer, water, storm water drainage, fire protection, police protection, and roads are to be available and adequate to serve the needs of the conditional use as designed and proposed.**

RESPONSE: The Facility does not require sewer or water service. The Facility was designed and constructed in accord with Adams County storm water drainage and, to the Applicant's knowledge, there are no issues with storm water drainage at the site as a result of the Facility. The need for fire or police protection is unlikely, but roads are available for this service if needed.

6. CONCLUSION

The zoning renewal application for the Telecommunications Tower at Parcel No. 0181900001001 in Adams County meets the requirements of the County's Development Standards and Regulations, and the Applicant respectfully requests that Adams County approve the CUP renewal for a term of 10 years.



VICINITY MAP

Exhibit 3.2



SITE NAME: RACEWAY
SITE NUMBER: 82148
SITE ADDRESS: 23700 E. 42ND AVE
AURORA, CO 80019



LOCATION MAP



AMERICAN TOWER®
ATC TOWER SERVICES, LLC
3500 REGENCY PARKWAY
SUITE 100
CARY, NC 27518
PHONE: (919) 468-0112

THESE DRAWINGS AND/OR THE ACCOMPANYING SPECIFICATION AS INSTRUMENTS OR SERVICE ARE THE EXCLUSIVE PROPERTY OF AMERICAN TOWER. THEIR USE AND PUBLICATION SHALL BE RESTRICTED TO THE ORIGINAL SITE FOR WHICH THEY ARE PREPARED. ANY USE OR DISCLOSURE OTHER THAN THAT WHICH RELATES TO AMERICAN TOWER OR THE SPECIFIED CARRIER IS STRICTLY PROHIBITED. TITLE TO THESE DOCUMENTS SHALL REMAIN THE PROPERTY OF AMERICAN TOWER WHETHER OR NOT THE PROJECT IS EXECUTED. NEITHER THE ARCHITECT NOR THE ENGINEER WILL BE PROVIDING ON-SITE CONSTRUCTION REVIEW OF THIS PROJECT. CONTRACTOR(S) MUST VERIFY ALL DIMENSIONS AND ADVISE AMERICAN TOWER OF ANY DISCREPANCIES. ANY PRIOR ISSUANCE OF THIS DRAWING IS SUPERSEDED BY THE LATEST VERSION ON FILE WITH AMERICAN TOWER.

REV.	DESCRIPTION	BY	DATE
0	FOR PERMITTING	NK	04/10/17
1	ADDED PLANTING PLAN	NRP	03/20/18
2	PER PLANNING COMMENTS	NRP	04/17/18
3	ADDED LANDSCAPING NOTE	NRP	05/17/18

ATC SITE NUMBER:
82148

ATC SITE NAME:
RACEWAY

SITE ADDRESS:
23700 E. 42ND AVE
AURORA, CO 80019

SEAL:


DRAWN BY:	NK
APPROVED BY:	PPB
DATE DRAWN:	04/10/17
ATC JOB NO:	12067621

TITLE SHEET

SHEET NUMBER: G-001	REVISION: 3
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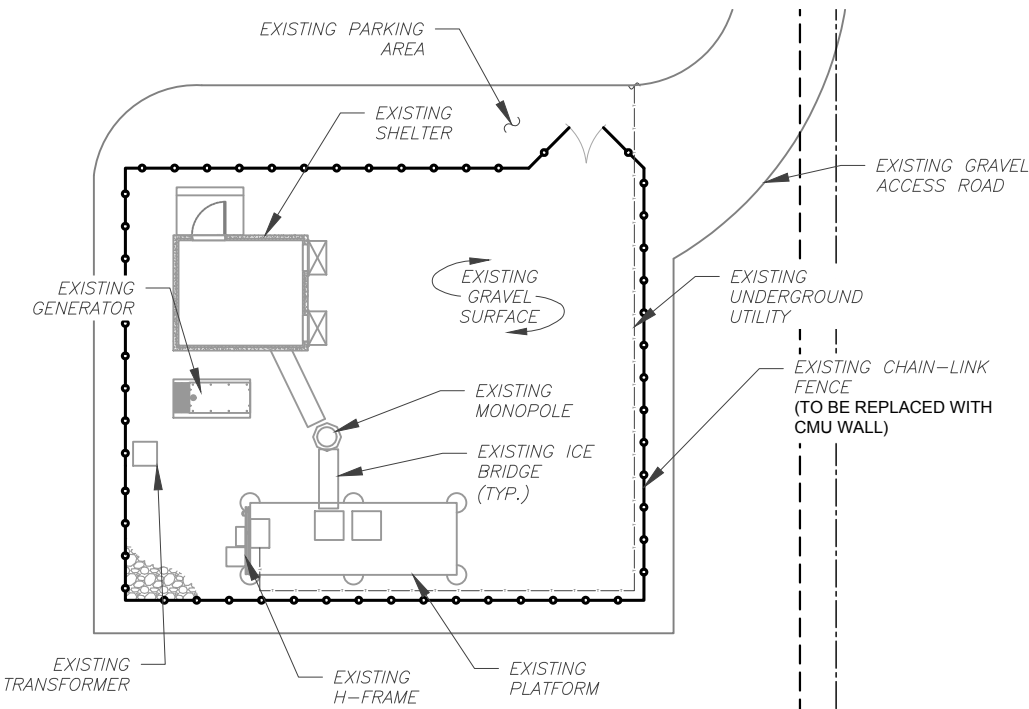
SPECIAL USE PERMIT RENEWAL

COMPLIANCE CODE	PROJECT SUMMARY	PROJECT DESCRIPTION	SHEET INDEX				
<p>ALL WORK SHALL BE PERFORMED AND MATERIALS INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNMENT AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES.</p> <p>1. INTERNATIONAL BUILDING CODE (IBC)</p> <p>2. NATIONAL ELECTRIC CODE (NEC)</p> <p>3. LOCAL BUILDING CODE</p> <p>4. CITY/COUNTY ORDINANCES</p>	<p><u>SITE ADDRESS:</u></p> <p>23700 E. 42ND AVE AURORA, CO 80019 COUNTY: ADAMS</p> <p><u>GEOGRAPHIC COORDINATES:</u></p> <p>LATITUDE: 39.7761 LONGITUDE: -104.71009 GROUND ELEVATION: 5520' AMSL</p> <p><u>ZONING INFORMATION:</u></p> <p>JURISDICTION: ADAMS COUNTY PARCEL NUMBER: 0181900001001 ZONING: A-2 (AGRICULTURAL-2)</p>	<p>THIS SUBMITTAL IS FOR RE-PERMITTING WITH THE ADAMS COUNTY. THIS SET OF DRAWINGS IS INTENDED TO DEPICT EXISTING SITE CONDITIONS.</p>	SHEET NO:	DESCRIPTION:	REV:	DATE:	BY:
			G-001	TITLE SHEET	3	05/17/18	NRP
			C-101	SITE PLAN	2	04/17/18	NRP
		<p>PROJECT NOTES</p> <p>1. THE FACILITY IS UNMANNED.</p> <p>2. A TECHNICIAN WILL VISIT THE SITE APPROXIMATELY ONCE A MONTH FOR ROUTINE INSPECTION AND MAINTENANCE.</p> <p>3. EXISTING FACILITY MEETS OR EXCEEDS ALL FAA AND FCC REGULATORY REQUIREMENTS.</p> <p>4. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT LAND DISTURBANCE OR EFFECT OF STORM WATER DRAINAGE.</p> <p>5. NO SANITARY SEWER, POTABLE WATER OR TRASH DISPOSAL IS REQUIRED.</p> <p>6. HANDICAP ACCESS IS NOT REQUIRED.</p>	C-102	PLANTING PLAN	3	05/17/18	NRP
			C-201	TOWER ELEVATION	2	04/17/18	NRP
			C-501	SIGNAGE	2	04/17/18	NRP
UTILITY COMPANIES		PROJECT TEAM					
<p>POWER COMPANY: XCEL PHONE: (800) 481-4700</p> <p>TELEPHONE COMPANY: CENTURY LINK PHONE: (800) 777-9594</p>	<p><u>TOWER OWNER:</u></p> <p>AMERICAN TOWER - DELAWARE CORP 10 PRESIDENTIAL WAY WOBURN, MA 01801</p> <p><u>PROPERTY OWNER:</u></p> <p>AURORA HIGHLANDS LLC 6550 SOUTH PECOS RD STE 124 LAS VEGAS, NV 89120</p> <p><u>ENGINEER:</u></p> <p>ATC TOWER SERVICES 3500 REGENCY PARKWAY SUITE 100 CARY, NC 27518</p> <p><u>AGENT:</u></p> <p>JEREMY MUDD ATTORNEY, AMERICAN TOWER 10 PRESIDENTIAL WAY WOBURN, MA 01801</p>	PROJECT LOCATION DIRECTIONS					
<div><p>Know what's below. Call before you dig.</p></div>		FROM DENVER, CO:					
		TAKE I-70 EAST. TAKE EXIT 286 GO NORTH ON TOWER RD., EAST ON E. 32ND. THEN EAST ON 26TH, THEN NORTH ON GUN CLUB RD. TO 23700 42ND AVE.					

- NOTES:
- THIS SET OF DRAWINGS IS INTENDED TO DEPICT EXISTING SITE CONDITIONS ONLY. THE PROJECT WILL NOT RESULT IN ANY PROPOSED WORK.
 - BOUNDARY INFORMATION OBTAINED FROM: ADAMS COUNTY GIS MAPPING.

LEGEND

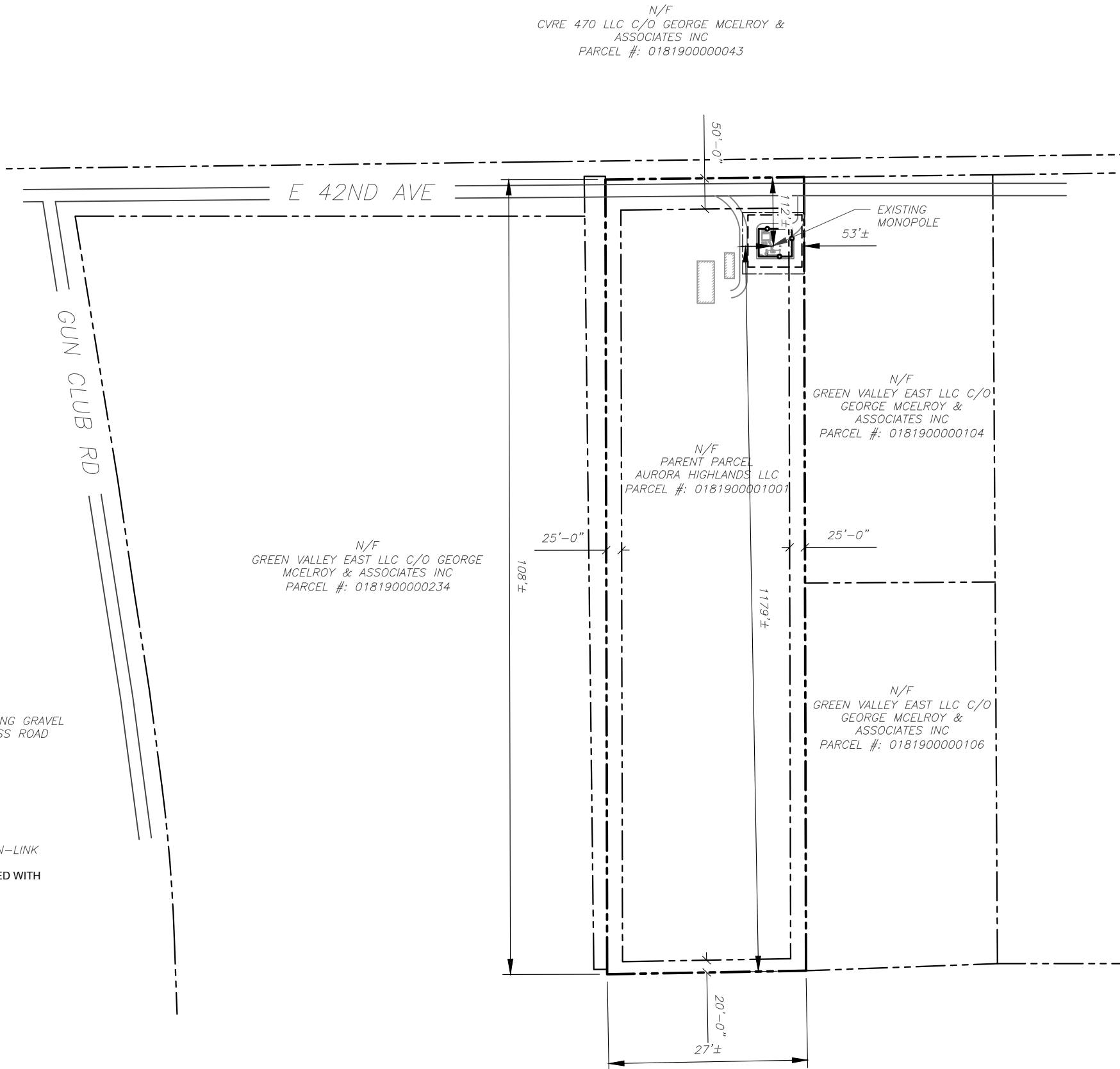
- EXISTING PROPERTY
- EXISTING ADJ. PROPERTY
- EXISTING PROPERTY SETBACK
- EXISTING CHAINLINK FENCE
- EXISTING BUILDING
- EXISTING ROAD (STONE)
- EXISTING ROAD (PAVED)
- EXISTING CONCRETE
- EXISTING TELCO
- PROPOSED CMU WALL



2 DETAILED SITE PLAN

0 20' 40'

SCALE: 1"=20' (11X17)
1"=10' (22X34)



3 OVERALL SITE PLAN

0 200' 400'

SCALE: 1"=200' (11X17)
1"=100' (22X34)





AMERICAN TOWER®
ATC TOWER SERVICES, LLC
3500 REGENCY PARKWAY
SUITE 100
CARY, NC 27518
PHONE: (919) 468-0112

THESE DRAWINGS AND/OR THE ACCOMPANYING SPECIFICATION AS INSTRUMENTS OR SERVICE ARE THE EXCLUSIVE PROPERTY OF AMERICAN TOWER. THEIR USE AND PUBLICATION SHALL BE RESTRICTED TO THE ORIGINAL SITE FOR WHICH THEY ARE PREPARED. ANY USE OR DISCLOSURE OTHER THAN THAT WHICH RELATES TO AMERICAN TOWER OR THE SPECIFIED CARRIER IS STRICTLY PROHIBITED. TITLE TO THESE DOCUMENTS SHALL REMAIN THE PROPERTY OF AMERICAN TOWER WHETHER OR NOT THE PROJECT IS EXECUTED. NEITHER THE ARCHITECT NOR THE ENGINEER WILL BE PROVIDING ON-SITE CONSTRUCTION REVIEW OF THIS PROJECT. CONTRACTOR(S) MUST VERIFY ALL DIMENSIONS AND ADVISE AMERICAN TOWER OF ANY DISCREPANCIES. ANY PRIOR ISSUANCE OF THIS DRAWING IS SUPERSEDED BY THE LATEST VERSION ON FILE WITH AMERICAN TOWER.

REV.	DESCRIPTION	BY	DATE
0	FOR PERMITTING	NK	04/10/17
1	ADDED PLANTING PLAN	NRP	03/20/18
2	PER PLANNING COMMENTS	NRP	04/17/18

ATC SITE NUMBER:
82148

ATC SITE NAME:
RACEWAY

SITE ADDRESS:
23700 E. 42ND AVE
AURORA, CO 80019

SEAL:

DRAWN BY:	NK
APPROVED BY:	PPB
DATE DRAWN:	04/10/17
ATC JOB NO:	12067621

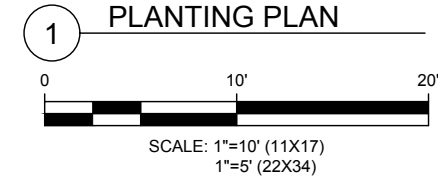
SITE PLAN

SHEET NUMBER:
C-101

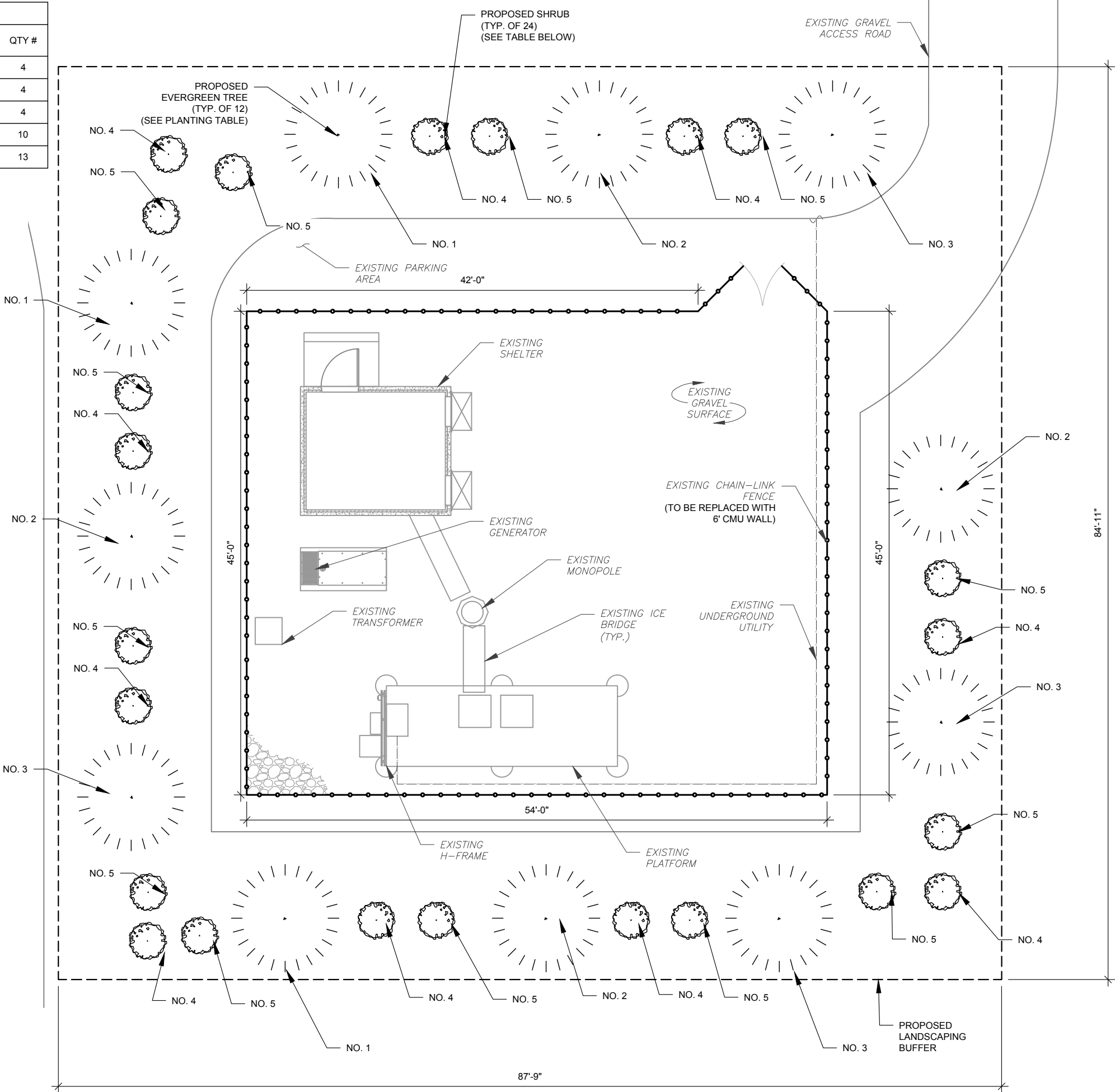
REVISION:
2

PLANTING TABLE			
NO.	SPECIES	MIN. PLANTING SIZE	QTY #
1	EVERGREEN (PINUS NIGRA)	5' TALL	4
2	EVERGREEN (PINUS PONDEROSA)	5' TALL	4
3	EVERGREEN (PINUS SYLVESTRIS)	5' TALL	4
4	SHRUB (ALNUS SP.)	5 GAL	10
5	SHRUB (POPULUS TREMULOIDES)	5 GAL	13

- NOTES:
- THE PERCENTAGE OF LIVING MATERIAL TO NON-LIVING MATERIAL IS APPROXIMATELY 67% LIVING TO 33% NON-LIVING
 - THERE IS NO IRRIGATION SYSTEM CURRENTLY AT THE SITE AND ATC WILL NOT BE INSTALLING ONE FOR THIS PROJECT.
 - PROPOSED LANDSCAPING WILL BE WATERED WEEKLY, TRUCKED IN UNTIL ESTABLISHED. ONCE ESTABLISHED, LANDSCAPING WILL BE WATERED EVERY 2 WEEKS.
 - LIVING GROUND COVERS MUST BE FIFTY PERCENT ESTABLISHED AFTER THE FIRST GROWING SEASON, AND NINETY PERCENT ESTABLISHED THEREAFTER.
 - NON-LIVING GROUND COVERS, SUCH AS ROCK OR MULCH MUST BE ONE HUNDRED PERCENT INTACT AFTER ONE YEAR AND EIGHTY PERCENT THEREAFTER.
 - TREES AND SHRUBS MUST HAVE A ONE HUNDRED PERCENT SURVIVAL RATE AFTER ONE YEAR AND A NINETY PERCENT SURVIVAL RATE THEREAFTER.



- LEGEND
- EXISTING PROPERTY
 - EXISTING ADJ. PROPERTY
 - EXISTING PROPERTY SETBACK
 - EXISTING CHAINLINK FENCE
 - EXISTING BUILDING
 - EXISTING ROAD (STONE)
 - EXISTING ROAD (PAVED)
 - EXISTING CONCRETE
 - EXISTING TELCO
 - PROPOSED CMU WALL





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ATC TOWER SERVICES, LLC
3500 REGENCY PARKWAY
SUITE 100
CARY, NC 27518
PHONE: (919) 468-0112

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REV.	DESCRIPTION	BY	DATE
0	FOR PERMITTING	NK	04/10/17
1	ADDED PLANTING PLAN	NRP	03/20/18
2	PER PLANNING COMMENTS	NRP	04/17/18
3	ADDED LANDSCAPING NOTE	NRP	05/17/18

ATC SITE NUMBER:
82148
ATC SITE NAME:
RACEWAY

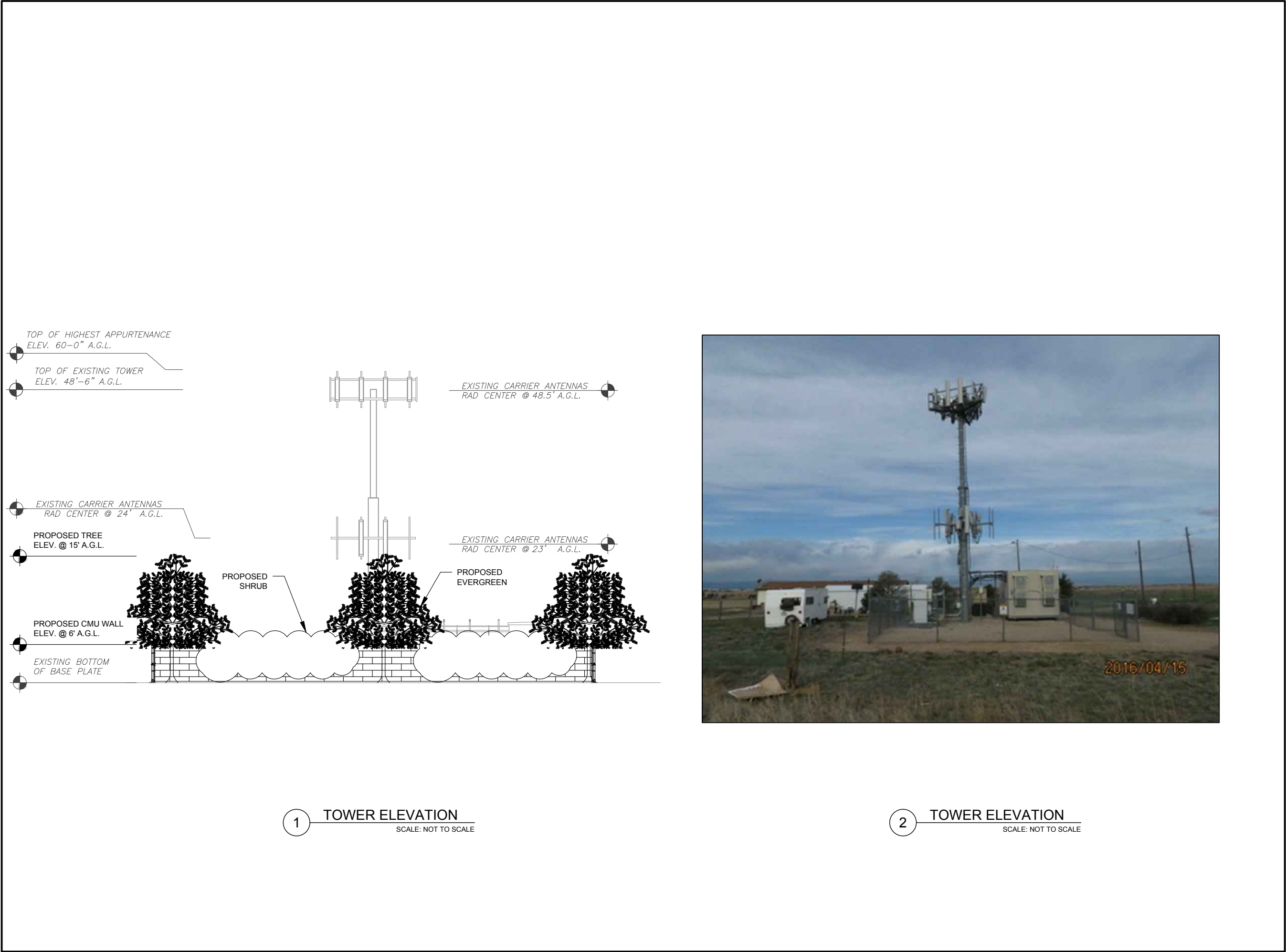
SITE ADDRESS:
23700 E. 42ND AVE
AURORA, CO 80019

SEAL:

DRAWN BY:	NK
APPROVED BY:	PPB
DATE DRAWN:	04/10/17
ATC JOB NO:	12067621

PLANTING PLAN

SHEET NUMBER: C-102	REVISION: 3
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2 TOWER ELEVATION
SCALE: NOT TO SCALE



AMERICAN TOWER®
ATC TOWER SERVICES, LLC
3500 REGENCY PARKWAY
SUITE 100
CARY, NC 27518
PHONE: (919) 468-0112

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REV.	DESCRIPTION	BY	DATE
0	FOR PERMITTING	NK	04/10/17
2	PER PLANNING COMMENTS	NRP	04/17/18

ATC SITE NUMBER:
82148

ATC SITE NAME:
RACEWAY

SITE ADDRESS:
23700 E. 42ND AVE
AURORA, CO 80019

SEAL:

DRAWN BY:	NK
APPROVED BY:	PPB
DATE DRAWN:	04/10/17
ATC JOB NO:	12067621

TOWER ELEVATION

SHEET NUMBER: C-201	REVISION: 2
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Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
2601 Meacham Boulevard
Fort Worth, TX 76193

Aeronautical Study No.
2015-ANM-1614-OE
Prior Study No.
2014-ANM-2511-OE

Issued Date: 07/07/2015

Regulatory
Verizon Wireless (VAW) LLC
1120 Sanctuary Pkwy
#150 GASA5REG
Alpharetta, GA 30009

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Antenna Tower Raceway
Location:	Aurora, CO
Latitude:	39-46-33.96N NAD 83
Longitude:	104-42-36.34W
Heights:	5520 feet site elevation (SE) 56 feet above ground level (AGL) 5576 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed and maintained in accordance with FAA Advisory circular 70/7460-1 K Change 2.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

This aeronautical study included evaluation of a structure that exists at this time. Action will be taken to ensure aeronautical charts are updated to reflect the most current coordinates, elevation and height as indicated in the case description.

A copy of this determination will be forwarded to the Federal Communications Commission (FCC) because the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at (310) 725-6591. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2015-ANM-1614-OE.

Signature Control No: 252391920-257009739

(DNE)

Tamera Burch
Technician

Attachment(s)
Frequency Data

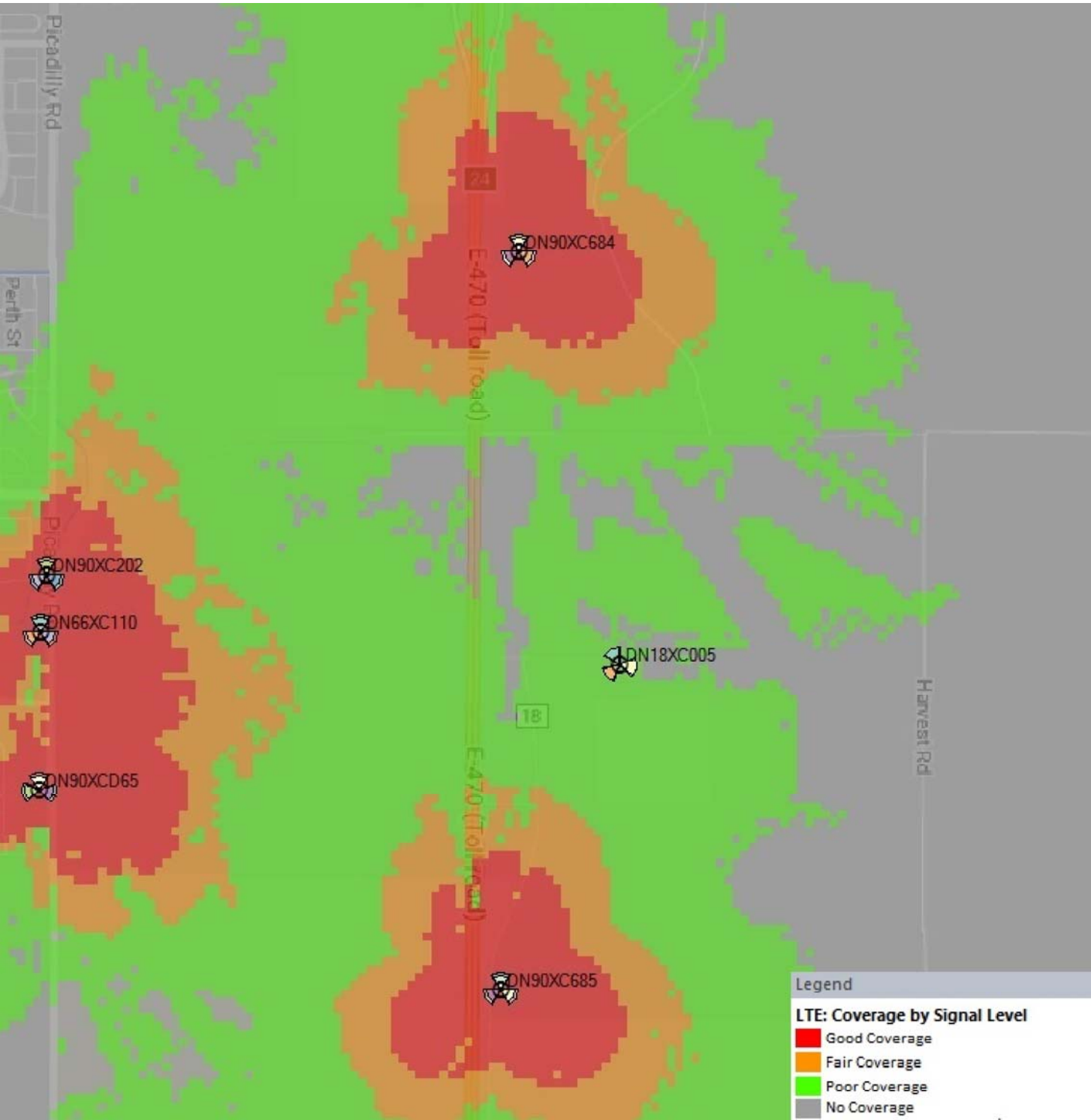
cc: FCC

Frequency Data for ASN 2015-ANM-1614-OE

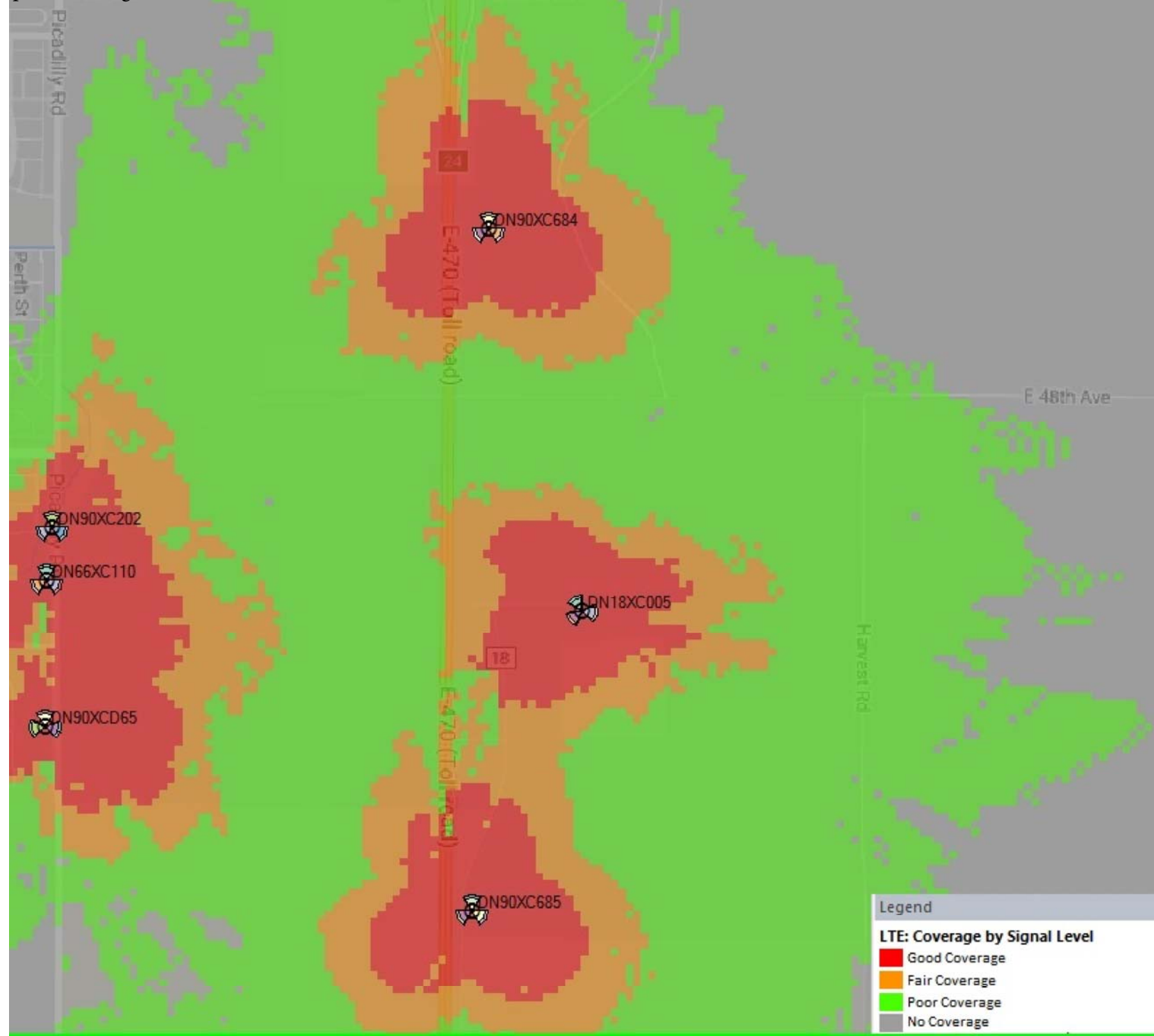
LOW FREQUENCY	HIGH FREQUENCY	FREQUENCY UNIT	ERP	ERP UNIT
698	806	MHz	1000	W
806	824	MHz	500	W
824	849	MHz	500	W
851	866	MHz	500	W
869	894	MHz	500	W
896	901	MHz	500	W
901	902	MHz	7	W
930	931	MHz	3500	W
931	932	MHz	3500	W
932	932.5	MHz	17	dBW
935	940	MHz	1000	W
940	941	MHz	3500	W
1850	1910	MHz	1640	W
1930	1990	MHz	1640	W
2305	2310	MHz	2000	W
2345	2360	MHz	2000	W

Exhibit 3.3

Sprint coverage without ATC site 82148

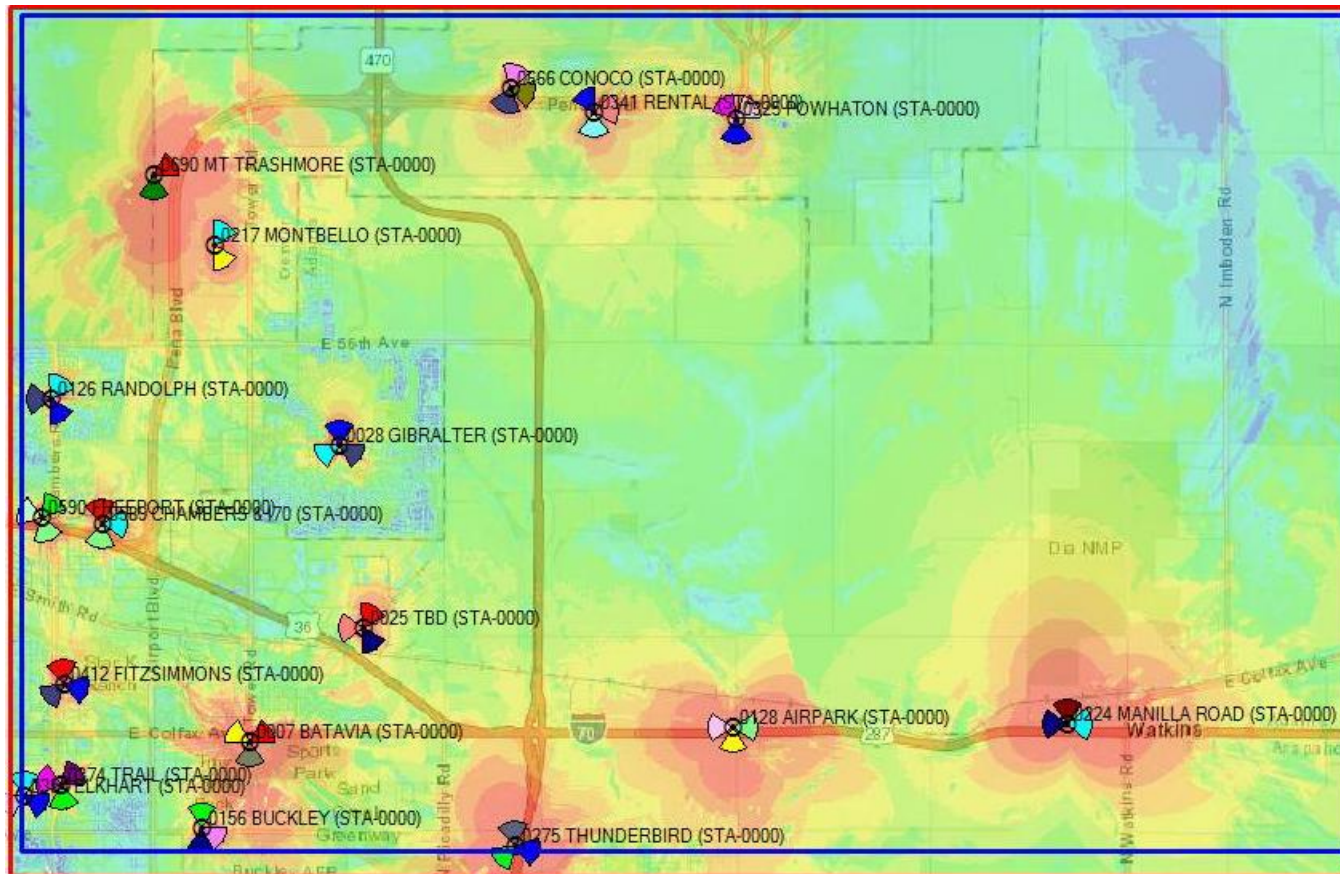


Sprint coverage with ATC site 82148



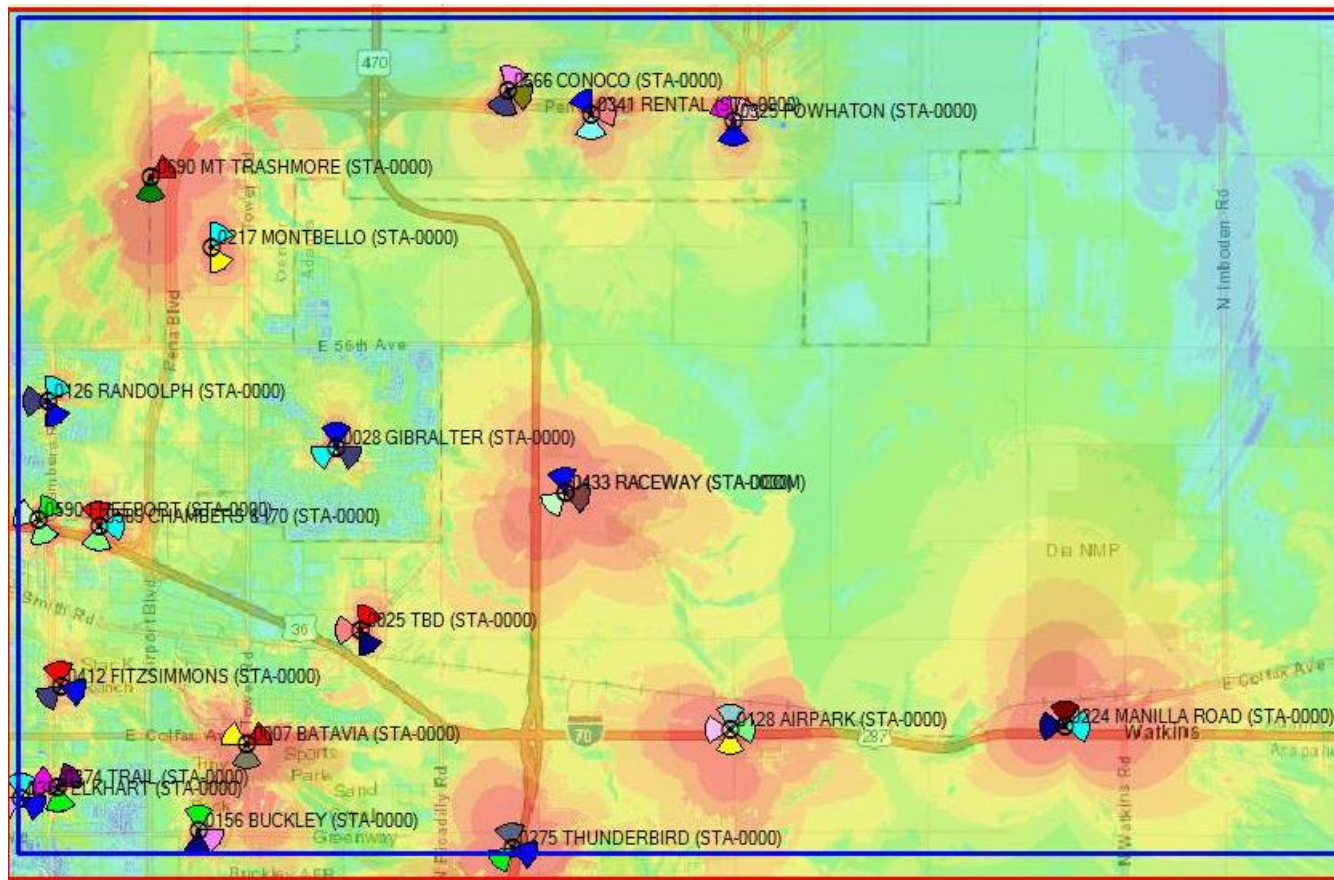
RSRP PLOT B13-700MHZ

Without Racine



Verizon Wireless

RSRP PLOT B13-700MHZ With Racine



Verizon Wireless

Community & Economic
Development Department
www.adcogov.org



4430 South Adams County Parkway
1st Floor, Suite W2000
Brighton, CO 80601-8204
PHONE 720.523.6800
FAX 720.523.6998

Development Review Team Comments

Date: 10/20/17

Project Number: RCU2017-00039

Project Name: American Towers

For submission of revisions to applications, a cover letter addressing each staff review comments must be provided. The cover letter must include the following information: restate each comment that require a response and provide a response below the comment; respond to each comment with a description of the revisions and the page of the response on the site plan. And identify any additional changes made to the original document other than those required by staff.

A re-submittal is required. Please submit one hard copy and one electronic copy to the Community and Economic Development Department with the re-submittal form.

Commenting Division: Development Services, Planning

Name of Reviewer: Emily Collins

Email: ecollins@adcogov.org

PLN1. This request is to renew a Conditional Use Permit (CUP) for a 50 foot tall Commercial Mobile Radio Service (CRMS) Telecommunications tower on the subject property.

- a. Lease area is 1,636 square feet.

PLN2. The subject property is designated Agriculture-2 (A-2) and approximately 9.5 acres.

- a. The purpose of the A-2 zone district is to provide a district for rural subdivisions and limited farming operations.
- b. Per Section 3-09-04-04, Commercial Communications towers are permitted with an approved Conditional Use Permit.

PLN3. Site History:

- a. The subject property was created in the Swain Subdivision, approved on May 18, 1972.
- b. On November 4, 1991, the BOCC approved a 50-ft tall communications tower (#101-91-C). The building permit for this tower was approved on February 14, 1991. This Conditional Use Permit expired after 10 years.
- c. On January 10, 1994, the BOCC approved an additional 70-ft tall tower; however, this tower was not constructed.
- d. Several upgrades and antenna replacements have been permitted .

PLN4. Comprehensive Plan:

- a. Designated as Urban Residential which is intended to provide for single and multiple family housing at urban densities.

PLN5. Performance Standards, Section 4-09-02-07

- a. All equipment shall be compatible with the surrounding area. This may be accomplished through color, texture, scale, etc.
- b. Siting and installation shall preserve or enhance existing character of the site. **Fencing should not be used exclusively but instead supplemented with vegetation.**
- c. Applicants shall demonstrate the tower is a necessary component of the overall communication network. The applicant must demonstrate with one of the following criteria:
 - i. Necessary to provide appropriate signal coverage quality
 - ii. Necessary pursuant to FCC license
 - iii. Necessary to handle increased capacity due to caller volume.
- d. **Please provide signal coverage maps to demonstrate need.**

PLN6. Freestanding Towers, Section 4-09-02-07 (3)

- a. Height shall conform to zone district unless exception is granted by the BOCC.
 - i. Maximum height in A-3 is 35 ft (dwellings/ accessory structures) or 70 ft (agricultural structures). **Existing structure conforms to height requirements.**
- b. Landscape requirements to mitigate the impacts of the tower or enhance the visual qualities and aesthetics of the larger parcel.
 - i. **The existing site does not have landscape in accordance with the performance standards. Please provide a landscape plan.**
- c. Setback is equal to the height of the tower unless exception granted by BOCC.
 - i. Site plan submitted with the application shows a 112 foot setback. **This exceeds the minimum 50 foot requirement per the height of the tower.**
- d. All towers must have minimum 1,000 foot setback from any other freestanding facility.
 - i. **Please provide information to show the location of other towers near this site.**
- e. All towers shall not be located closer than 500 feet from any occupied dwelling unit, unless the property owner provides a written waiver.
 - i. **There is an existing residential structure on the property. Please confirm if a waiver has been obtained.**
- f. The structure shall not block any significant views (i.e. Front Range, S. Platte River, Barr Lake, etc.)
 - i. **Not applicable.**

PLN7. Equipment Shelter Design, Section 4-09-02-07 (4)

- a. All shelters shall be screened from adjacent public areas and right of ways.
- b. Shelters shall be in an enclosed building architecturally compatible with surrounding area.

- c. Shelters shall be screened with compatible wall or fence.
- d. Appearance shall be enhanced by vegetation and shall not cover more than 450 square feet.
- e. **Proposed plan does conform to these requirements for the equipment shelter.**

PLN8. Other comments:

- a. **The site is located with the Airport Height Overlay (Section 3-33). Please confirm if the development has previously completed an FAA aeronautical study.**
- b. **Please confirm if a signed and recorded aviation easement has been filed on the property.**

PLN9. Anticipated Conditions of Approval:

- a. **Bond for removal of the tower**
- b. **Expiration (10 years)**
- c. **Landscape and screening plan.**

PLN10. Criteria of Approval:

- a. Conditional use is permitted in the zone district.
- b. Conditional use is consistent with standards and regulations.
- c. Conditional use complies with all performance standards.
- d. Conditional use is compatible with surrounding area, not detrimental to future development, and not detrimental to health, safety and welfare of inhabitants.
- e. Addressed all off-site impacts.
- f. Site is suitable for the use (adequate space, access, etc.)
- g. Site plan provides the most convenient and functional use of the lot.
- h. Sewer, water, fire, police, and roads are available and adequate to serve the use.

Commenting Division: Development Services, Engineering:

Name of Reviewer: Greg Labrie

Email: glabrie@adcogov.org

ENG1: No comments.

Commenting Division: Development Services, Right-Of-Way

Name of Reviewer: Marissa Hillje

Email: mhillje@adcogov.org

ROW1: E 42nd Ave is City of Aurora, Aurora shall be contacted to inquire if additional right-of-way is required.

Commenting Division: Building Safety

Name of Reviewer: Justin Blair

Email: jblair@adcogov.org

BSD1- No comment.

Commenting Division: Parks and Open Space

Name of Reviewer: Aaron Clark

Email: aclark@adcogov.org

PRK 1: No comments.

Commenting Division: Environmental Analyst

Name of Reviewer: Jen Rutter

Email: jrutter@adcogov.org

ENV1: No comments.

Exhibit 4.2

Emily Collins

From: linda.bruce@faa.gov
Sent: Tuesday, September 26, 2017 7:35 AM
To: Emily Collins
Subject: RE: RCU2017-00039 Request for Comments

Emily,

The Federal Aviation Administration (FAA) reviews planning and construction proposals through the submittal of FAA Form 7460-1, Notice of Proposed Construction or Alteration. If any portion of the proposal is located within 20,000 feet of a public use runway (and breaks a 100:1 plane coming off the nearest point of the nearest runway); or, is more than 200 feet above ground level at any location, the FAA requires the project's proponent to file a Form 7460-1. If the proposal does not meet any of the criteria above, it may still be necessary to file a Form 7460-1 if the structure requires an FCC license or there is a potential for navigational equipment interference. The FAA uses information provided on this form to conduct an aeronautical review to determine if the proposal will pose an aeronautical hazard and to minimize the adverse effects to aviation. FAA Form 7460-1 can be filed electronically at www.oaaaa.faa.gov. Please use the notice criteria tool on this website to determine whether or not the proponent is required to file.

Linda Bruce
Colorado State Planner
Federal Aviation Administration
Denver Airports District Office
(303) 342-1264

From: Emily Collins [<mailto:ECollins@adcogov.org>]
Sent: Monday, September 25, 2017 4:20 PM
To: pingrum@auroragov.org; william.poole@flydenver.com; George, Donna L <Donna.L.George@xcelenergy.com>; Bruce, Linda (FAA) <linda.bruce@faa.gov>; kammyt@pinnacleconsultinggroupinc.com; jilbarry@aps.k12.co.us; pbinney@ci.aurora.co.us; thomas_lowe@cable.comcast.com; landuse@tchd.org; brandyn.wiedrich@centurylink.com; tom.reed@flydenver.com
Subject: RCU2017-00039 Request for Comments

Good Afternoon:

Please see the attached Request for Comments on the above case. **Comments are due by Monday, October 16th.**

Thanks!



Emily Collins, AICP

Planner II, *Community and Economic Development*
ADAMS COUNTY, COLORADO
4430 South Adams County Parkway, W2000A
Brighton, CO 80601
o: 720-523-6820 | ecollins@adcogov.org
www.adcogov.org



Right of Way & Permits
1123 West 3rd Avenue
Denver, Colorado 80223
Telephone: **303.571.3306**
Facsimile: 303. 571.3284
donna.l.george@xcelenergy.com

October 10, 2017

Adams County Community and Economic Development Department
4430 South Adams County Parkway, 3rd Floor, Suite W3000
Brighton, CO 80601

Attn: Emily Collins

Re: American Towers, Case # RCU2017-00039

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the conditional use permit documentation for **American Towers** and has **no apparent conflict**.

Please be aware PSCo owns and operates existing electric distribution facilities within the subject property, and should the project require any new electric service or modification to existing facilities, the property owner/developer/contractor must complete the **application process** via FastApp-Fax-Email-USPS (go to: https://www.xcelenergy.com/start_stop_transfer/new_construction_service_activation_for_builders).

If you have any questions about this referral response, please contact me at (303) 571-3306.

Donna George
Contract Right of Way Referral Processor
Public Service Company of Colorado



Planning Division
15151 E. Alameda Parkway, Ste. 2300
Aurora, Colorado 80012
303.739.7250

Worth Discovering • auroragov.org

March 28, 2018

Ms. Emily Collins
Adams County Colorado
4430 S. Adams County Parkway, W2000A
Brighton, CO 80601
ecollins@adcogov.org

Case Name: American Towers
Case Number: RCU2017-00039

Dear Ms. Collins,

Thank you for giving the City of Aurora Planning and Development Services an opportunity to review the above referenced case. We have reviewed the application for the Conditional Use Permit for the Commercial Mobile Radio Service Telecommunications Site (CMRS) located at 23700 E. 42nd Avenue and offer the following comments regarding the requested 10 year term for the 50 foot monopole and ancillary equipment.

The existing CMRS is within a parcel of land that has recently petitioned for annexation into the City of Aurora. The site is also located within the boundary of a proposed master planned community. Application for The Aurora Highlands Framework Development Plan was received in June 2017. The existing location of the monopole will not be compatible with the proposed land uses.

American Towers requests to extend the use of the 50 foot monopole and equipment area for an additional 10 years in accordance with the Adams County code requirements. The City of Aurora does not support the applicant's request and respectfully asks you to consider the pending annexation. This is scheduled for Substantial Compliance Resolution on May 7, 2018. The proposal does not comply with the standards outlined in [Code Section 146-1200](#) for CMRS facilities and we suggest the applicant work directly with The Aurora Highlands to determine a more compatible location for the CMRS facility.

Sincerely,

Deborah Bickmire, Planner I

cc: Mindy Parnes, Planning Department
Gary Sandel, ODA
Filed: K:\\$DA\2062-00AdCoRef.rtf



Mark A. Davidson
(303) 894-4425
mdavidson@fwlaw.com

October 16, 2017

VIA EMAIL TO: ECollins@adcogov.org

Department of Community and Economic
Development
4430 South Adams County Parkway
1st Floor, Suite W 2000 B
Brighton, CO 80601

Re: American Towers; Case No. RCU2017-00039

Dear Commissioners:

On behalf of Aurora Highlands, I write to you in opposition to the Conditional Use Permit requested by American Towers for continued operation of a telecommunications cell tower located at 23700 East 42nd Avenue. Pursuant to the Conditional Use Permit Review Steps found in the Adams County Code at Chapter 2, 2-02-08-05 and the Criteria for Approval found at 2-02-08-06, Aurora Highlands submits these comments in opposition to renewal of the Conditional Use Permit sought by American Towers LLC. We request that these comments be included in the materials presented to the Planning Commission verbatim.

Aurora Highlands is developing a master planned community in the area including the existing cell tower for which the renewal of a Conditional Use Permit for a 10-year period is sought by American Towers. The cell tower in its current location is an incompatible use with the intended master plan development. From the date of the issuance of the original easement and Conditional Use Permit in 1991 covering the construction of the existing cell tower, changed circumstances have resulted in this cell tower facility no longer constituting a compatible use for this portion of Adams County. The changed circumstances include the Colorado Aerotropolis Visioning Study around Denver International Airport, the Northeast Aurora Transit Study, the rezoning of surrounding areas for airport corporate and distribution, retail/commercial, industrial, office, residential and other non-agricultural uses and the other proposed and planned developments including the Aurora Highlands Project. All of these new initiatives in Adams County necessitate relocation of the cell tower in question from its current location.

Aurora Highlands has previously informed American Towers that the existing location of its cell tower facility is no longer a compatible use. Aurora Highlands requested a reasonable amendment to the existing easement utilized by American Towers for the location of this facility to enable the continued provision of cellular service by relocating the tower to a mutually agreeable location which will enable the Aurora Highlands master planning process to proceed.

Department of Community and Economic Development

October 16, 2017

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American Towers has refused to accommodate this necessary modification, despite other concessions which Aurora Highlands has offered.

In a further effort to facilitate the relocation of the cell tower, Aurora Highlands offered to allow the tower to temporarily remain at its current location for the next 12 months while a new compatible location for the facility is found. Aurora Highlands has also expressed its willingness to provide a mutually-acceptable alternative site for American Towers to relocate the cell tower at American Towers' expense. Finally, Aurora Highlands offered to work with the City of Aurora to obtain a permit for the temporary use of the current cell tower site while a new location for the cell tower is found and American Tower makes arrangements for its relocation. All of these concessions were rejected by the Applicant for the Conditional Use Permit in this case.

Regarding the criteria for approval of a Conditional Use Permit, the Planning Commission in making its recommendation and the Board of County Commissioners in approving a Conditional Use Permit, shall find (among other things) that:

4. The conditional use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, *not detrimental to the future development of the area* and not detrimental to the health, safety or welfare of the inhabitants of the area and the county. In making this determination, the Planning Commission and the Board of County Commissioners shall find, at a minimum, that the conditional use will not result in excessive traffic generation, noise, vibration, dust, glare, heat, smoke, fumes, gas, odors, or inappropriate hours of operation. (emphasis added).

6. The site is suitable for the conditional use including adequate usable space, *adequate access*, and absence of environmental constraints.

With respect to the tower in question, Aurora Highlands submits that its current location is specifically detrimental to the future development of the area as it is in the path of the master plan community being developed consistent with the other development activities referred to above.

An additional concern is adequate access to the site for emergency vehicles. As Aurora Highlands has also informed the holder of the current conditional use permit, the existing roadway is problematic from a site-access standpoint for emergency vehicles. Aurora Highlands has offered to pave the road to accommodate better access with the understanding that American Towers will relocate the cell tower to an agreed upon location within a reasonable period of time. This proposal was likewise rejected by American Tower and the existing access remains incompatible for use by emergency vehicles.

Department of Community and Economic Development

October 16, 2017

Page 3

In its application, American Towers, while citing the appropriate code section 2-02-08-06, fails to discuss and describe the detrimental impacts to future developments in the area of the continued location and operation of the cell tower facility. In the 36 years since the original Conditional Use Permit for this facility was approved, significant changes have occurred in Adams County regarding the economic development potential of this portion of the County. Relocation of the cell tower is an appropriate accommodation to be made in order to enable the Aurora Highlands master planned community to proceed unencumbered by an incompatible use.

In the event that the Planning Commission is inclined to grant a renewal of the Conditional Use Permit sought by American Towers, Aurora Highlands respectfully requests that the time period of 12 to 24 months be the extent of any continued Conditional Use Permit for this facility, rather than a 10-year renewal period requested in the application. In addition, Aurora Highlands requests that the Conditional Use Permit apply only to the approximately 1,636 square foot easement area held by American Tower, rather than the entire 10-acre parcel owned by Aurora Highlands.

Finally, if the Conditional Use Permit is approved for a term of 5 years or more, Aurora Highlands requests that the Planning Commission impose the following conditions on the permit:

1. Limit the height and footprint of the tower and all structures to the height and footprint of the existing tower and structures.
2. Require American Tower to install, construct, and maintain perimeter landscaping and fencing, improve and beautify the access way to the tower, and install lighting and signage consistent with the Aurora Highlands Framework Development Plan (FDP) requirements and standards.

Aurora Highlands appreciates the opportunity to submit this response and these comments to the application of American Towers for renewal of a Conditional Use Permit at 23700 East 42nd Avenue.

Sincerely,



Mark A. Davidson
Fairfield and Woods, P.C.

MAD:ajj

Community & Economic
Development Department
www.adcogov.org



4430 South Adams County Parkway
1st Floor, Suite W2000B
Brighton, CO 80601-8218
PHONE 720.523.6800
FAX 720.523.6967

Request for Comments

Case Name:	American Towers
Case Number:	RCU2017-00039

Septmeber 25, 2017

Adams County Planning Commission is requesting comments on the following request:

Requesting a Conditional Use Permit to allow an existing Communications Tower for an additional ten years.

This request is located at **23700 E 42ND AVE.**

The Assessor's Parcel Number is **0181900001001**

Applicant Information **AMERICAN TOWERS LLC**

**LIZ WALKER/ BONNIE BELAIR / MARGARET ROBINSON
10 PRESIDENTIAL WAY
WOBURN, MA 01801**

Please forward any written comments on this application to the Department of Community and Economic Development at 4430 South Adams County Parkway, Suite W2000A Brighton, CO 80601-8216. (720) 523-6820 by **October 16, 2017** in order that your comments may be taken into consideration in the review of this case. If you would like your comments included verbatim please send your response by way of e-mail to ECollins@adcogov.org.

Once comments have been received and the staff report written, the staff report and notice of public hearing dates will be forwarded to you for your information. The full text of the proposed request and additional colored maps can be obtained by contacting this office or by accessing the Adams County web site at www.adcogov.org/planning/currentcases.

Thank you for your review of this case.

Emily Collins

Emily Collins, AICP
Case Manager



Public Hearing Notification

Case Name:	American Towers
Case Number:	RCU2017-00039
Planning Commission Hearing Date:	06/14/2018 at 6:00 p.m.
Board of County Commissioners Hearing Date:	07/03/2018 at 9:30 a.m.

May 18, 2018

A public hearing has been set by the Adams County Planning Commission and the Board of County Commissioners to consider the following request:

A Conditional Use Permit (renewal) to allow an existing freestanding communications tower in the Agriculture-2 (A-2) zone district pursuant to Section 2-02-08.

This request is located at approximately **23700 E. 42nd AVENUE**

The Assessor's Parcel Number is **0181900001001**

Applicant Information: **LIZ WALKER (AMERICAN TOWERS LLC)**
10 PRESIDENTIAL WAY
WOBURN, MA 01801

The hearing will be held in the Adams County Hearing Room located at 4430 South Adams County Parkway, Brighton CO 80601. This will be a public hearing and any interested parties may attend and be heard. The Applicant and Representative's presence at these hearings is requested. If you require any special accommodations (e.g., wheelchair accessibility, an interpreter for the hearing impaired, etc.) please contact the Adams County Community and Economic Development Department at 720-523-6800 (or if this is a long distance call, please use the County's toll free telephone number at 1-800-824-7842) prior to the meeting date. For further information regarding this case, please contact the Department of Community and Economic Development, 4430 S. Adams County Parkway, Brighton, CO 80601, 720-523-6800. This is also the location where maps and/or text certified by the Planning Commission may be viewed. The full text of the proposed request and additional colored maps can be obtained by contacting this office or by accessing the Adams County web site at www.adcogov.org/planning/currentcases.

Thank you for your review of this case.

Emily Collins, AICP
Case Manager

NOTICE OF PUBLIC HEARING FOR LANDUSE

NOTICE IS HEREBY GIVEN, that an application has been filed by **LIZ WALKER (AMERICAN TOWERS LLC)** Case # **RCU2017-00039** requesting: **A Conditional Use Permit (renewal) to allow an existing freestanding communications tower in the Agriculture-2 (A-2) zone district pursuant to Section 2-02-08** on the following property:

LEGAL DESCRIPTION:

PARENT PARCEL:

SITUATED IN THE COUNTY OF ADAMS AND STATE OF COLORADO:

ALL OF SWAIN SUBDIVISION, EXCEPT THE NORTH 25 FEET THEREOF, COUNTY OF ADAMS, STATE OF COLORADO, AND EXCEPT FOR THE PORTION THEREOF AS FOLLOWS:

THE SOUTH 5.00 FEET OF THE NORTH 30.00 FEET OF SWAIN SUBDIVISION, BEING A SUBDIVISION OF A PART OF THE SOUTHWEST 1/4 OF SECTION 19, TOWNSHIP 3 SOUTH, RANGE 65 WEST OF THE 6TH P.M., COUNTY OF ADAMS, STATE OF COLORADO, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID SOUTHWEST 1/4; THENCE S 89°22'33" E A DISTANCE OF 1,319.93 FEET TO THE NORTHWEST CORNER OF SAID SWAIN SUBDIVISION; THENCE S 01°10'57"W ALONG THE EAST LINE OF SAID SWAIN SUBDIVISION A DISTANCE OF 25.00 FEET TO THE TRUE POINT OF BEGINNING; THENCE S 89°22'33"E PARALLEL WITH AND 25.00 FEET SOUTH OF THE NORTH LINE OF SAID SOUTHWEST 1/4 A DISTANCE OF 327.18 FEET TO THE EAST LINE OF SAID SWAIN SUBDIVISION; THENCE S 01°12'49"W ALONG SAID EAST LINE A DISTANCE OF 5.00 FEET; THENCE N 89°22'33"W PARALLEL WITH AND 30.00 FEET SOUTH OF THE NORTH LINE OF SAID SOUTHWEST 1/4 A DISTANCE OF 327.17 FEET TO THE WESTLINE OF SAID SWAIN SUBDIVISION; THENCE N 01°10'57"E ALONG SAID WEST LINE A DISTANCE OF 5.00 FEET TO THE TRUE POINT OF BEGINNING. CONTAINS 1,635.88 SQUARE FEET OR 0.0376 ACRES, MORE OR LESS.

COMMUNICATION EASEMENT:

A parcel of land situated in a portion of Swain Subdivision. Being a portion of the Southwest One-Quarter of Section 19, Township 3 South, Range 65 West of the Sixth Principal Meridian, County of Adams, State of Colorado, more particularly described as follows:

COMMENCING AT THE CENTER WEST ONE-SIXTEENTH (CW 1/16) CORNER OF SAID SECTION 19; THENCE SOUTH 00°39' 56" WEST ALONG THE WEST LINE OF THE NORTHEAST ONE-QUARTER OF THE SOUTHWEST ONE-QUARTER OF SAID SECTION 19 A DISTANCE OF 89.40 FEET TO A POINT ON THE SOUTH LINE OF AN UNRECORDED RIGHT OF WAY AGREEMENT; THENCE SOUTH 89° 26' 25" EAST ALONG THE SOUTH LINE OF SAID UNRECORDED RIGHT OF WAY AGREEMENT A DISTANCE OF 227.18 FEET TO THE TRUE POINT OF BEGINNING; THENCE CONTINUING SOUTH 89° 26' 25" EAST ALONG THE SOUTH LINE OF SAID UNRECORDED RIGHT OF WAY AGREEMENT A DISTANCE OF 100.00 FEET TO A POINT ON THE EAST LINE OF SAID SWAIN SUBDIVISION AS PLATTED; THENCE SOUTH 01° 12' 49" WEST ALONG THE EAST LINE OF SAID SWAIN SUBDIVISION AS PLATTED A DISTANCE OF 100.00 FEET; THENCE NORTH 89° 26' 25" WEST AND PARALLEL WITH THE SOUTH LINE OF SAID UNRECORDED RIGHT OF WAY AGREEMENT A DISTANCE OF 100.00 FEET; THENCE NORTH 01° 12' 48"-EAST AND PARALLEL WITH THE EAST LINE OF SAID SWAIN SUBDIVISION AS PLATTED A DISTANCE OF 100.00 FEET TO THE TRUE POINT OF BEGINNING. CONTAINING 10,000 SQUARE FEET OR 0.2296 ACRES MORE OR LESS.

(The above legal description was provided by the applicant and Adams County is not responsible for any errors and omissions that may be contained herein and assumes no liability associated with the use or misuse of this legal description.)

APPROXIMATE LOCATION: **23700 E. 42nd AVENUE**

NOTICE IS HEREBY GIVEN that a public hearing will be held by the Adams County Planning Commission in the Hearing Room of the Adams County Government Center, 4430 S. Adams County Parkway, Brighton, CO – 1st Floor, on the **14th day of June, 2018**, at the hour of 6:00 p.m., where and when any person may appear and be heard and a recommendation on this application will be forwarded to the Board of County Commissioners.

NOTICE IS FURTHER GIVEN, that a public hearing will be held by the Adams County Board of County Commissioners in the Hearing Room of the Adams County Government Center, 4430 S. Adams County Parkway, Brighton, CO – 1st Floor, on the **3rd day of July, 2018**, at the hour of 9:30 a.m., to consider the above request where and when any person may appear and be heard.

For further information regarding this case, please contact **Emily Collins** at the Department of Community and Economic Development, 4430 S. Adams County Pkwy, Brighton, CO 80601, 720.523.6820. This is also the location where the maps and/or text certified by the Planning Commission may be viewed.

BY ORDER OF THE BOARD OF COUNTY COMMISSIONERS
STAN MARTIN, CLERK OF THE BOARD

TO BE PUBLISHED IN THE **May 29, 2018 ISSUE OF THE Commerce City Sentinel Express**

Please reply to this message by email to confirm receipt or call **Shayla Christenson** at 720.523.6800.

Exhibit 6.4

ADAMS ARAPAHOE SCHOOL DISTRICT 28J
Attn: JOHN BARRY - SUPERINTENDENT
15701 E 1ST AVE STE 206
AURORA CO 80011

Adams County Development Services - Building
Attn: Justin Blair
4430 S Adams County Pkwy
Brighton CO 80601

Century Link, Inc
Attn: Brandyn Wiedreich
5325 Zuni St, Rm 728
Denver CO 80221

CITY OF AURORA - WATER AND SAN. DEPT.
Attn: PETER BINNEY
15151 E ALAMEDA PKWY #3600
AURORA CO 80012

CITY OF AURORA ATTN: PLANNING DEPARTMENT
Attn: Porter Ingrum
15151 E ALAMEDA PKWY 2ND FLOOR
AURORA CO 80012

Code Compliance Supervisor
Attn: Eric Guenther
eguenther@adcogov.org

COMCAST
Attn: JOE LOWE
8490 N UMITILLA ST
FEDERAL HEIGHTS CO 80260

COUNTY ATTORNEY- Email
Attn: Christine Francescani
CFrancescani@adcogov.org

Denver International Airport
Attn: Tom Reed

DENVER INTERNATIONAL AIRPORT
Attn: Bill Poole
900 South Broadway Suite 350
DENVER CO 80209

Engineering Department - ROW
Attn: Transportation Department
PWE - ROW

Engineering Division
Attn: Transportation Department
PWE

ENVIRONMENTAL ANALYST
Attn: Jen Rutter
PLN

FEDERAL AVIATION ADMINISTRATION
Attn: LINDA BRUCE
26805 E 68TH AVENUE, #224
DENVER CO 80249-6361

FIRST CREEK RANCH METRO DIST.
Attn: . .
c/o Miller & Associates Law Offices, LLC
1641 California Street, Suite 300
DENVER CO 80202

NS - Code Compliance
Attn: Gail Moon
gmoon@adcogov.org

Parks and Open Space Department
Attn: Nathan Mosley
mpedrussi@adcogov.org
aclark@adcogov.org

SABLE ATURA FIRE DIST.
Attn: Kammy Tinney
26900 E. COLFAX AVE SPACE 52
AURORA CO 80018

SHERIFF'S OFFICE: SO-HQ
Attn: MICHAEL McINTOSH
nblair@adcogov.org, aoverton@adcogov.org; mkaiser@adcog
snielson@adcogov.org

Sheriff's Office: SO-SUB
Attn: SCOTT MILLER
TFuller@adcogov.org, smiller@adcogov.org
aoverton@adcogov.org; mkaiser@adcogov.org

TRI-COUNTY HEALTH DEPARTMENT
Attn: MONTE DEATRICH
4201 E. 72ND AVENUE SUITE D
COMMERCE CITY CO 80022

TRI-COUNTY HEALTH DEPARTMENT
Attn: Sheila Lynch
6162 S WILLOW DR, SUITE 100
GREENWOOD VILLAGE CO 80111

Tri-County Health: Mail CHECK to Sheila Lynch
Attn: Tri-County Health
landuse@tchd.org

Xcel Energy
Attn: Donna George
1123 W 3rd Ave
DENVER CO 80223

Xcel Energy
Attn: Donna George
1123 W 3rd Ave
DENVER CO 80223

Exhibit 6.5

AURORA HIGHLANDS LLC
250 PILOT RD STE 140
LAS VEGAS NV 89119-3543

E-470 PUBLIC HIGHWAY AUTHORITY
22470 E 6TH PKWY NO. 100
AURORA CO 80018

GREEN VALLEY AURORA LLC
C/O GEORGE MCELROY & ASSOCIATES INC
250 PILOT RD STE 140
LAS VEGAS NV 89119-3543

GREEN VALLEY EAST LLC
C/O GEORGE MCELROY & ASSOCIATES INC
250 PILOT RD STE 140
LAS VEGAS NV 89119-3543

GVRE 470 LLC
C/O GEORGE MCELROY & ASSOCIATES INC
250 PILOT RD STE 140
LAS VEGAS NV 89119-3543

WINDLER HOMESTEAD VI LLC
C/O GARRETT A BAUM
5440 LAKESHORE DRIVE
LITTLETON CO 80123

CERTIFICATE OF POSTING



I, Emily Collins do hereby certify that I had the property posted at

23700 E. 42ND AVE.

on May 25, 2018

in accordance with the requirements of the Adams County Zoning Regulations

Emily Collins

Emily Collins