

April 6, 2023

El Paso County  
Planning and Community Development Department  
2880 International Circle, Suite 110  
Colorado Springs, CO 80910

Re: American Tower Corporation, Replacement of telecommunications structure, 2945 Little Turkey Creek Rd, Colorado Springs, CO

Applicant: Tilson Technology Management on behalf of American Tower Corporation

Contact: Heather Carlisle

Property Address: 2945 Little Turkey Creek Rd, Colorado Springs, CO

Property Tax Schedule Number: 7615000004

Current Zoning of the Property: A-5

To Whom It May Concern,

Tilson Technology Management, Inc., (“Tilson”) on behalf of American Tower Corporation (“ATC”) respectfully submits the following information to supplement its application for a Site Development Plan Application for the proposed replacement tower located at 2945 Little Turkey Creek Rd, Colorado Springs, CO. Pursuant to Section 5.2.19 (B) of the El Paso County Land Development Code, Tilson presents the following information:

**5.2.19. Commercial Mobile Radio Service Facility (CMRS) Facilities**

*(B) General Standards*

*An applicant for a new freestanding CMRS facility shall demonstrate that a good faith effort has been made to co-locate on existing CMRS facilities. The applicant shall demonstrate that due to*

*physical constraints, or economic or technological infeasibility, no such location or co-location is available. The applicant shall also demonstrate that contact has been made with the owners of all suitable structures within the search area of the proposed site and was denied permission to locate its CMRS facility on those structure:*

*All facilities shall be designed and constructed to allow for colocation of a minimum of 2 users unless specifically exempted by the BOCC.*

**American Tower is proposing to replace the existing tower located at 2945 Little Turkey Creek Rd, Colorado Springs with a new tower and add an additional height of 20' (increasing the height of the previous stealth monopine from 49' to 69') to accommodate an additional carrier. This will therefore fall under the site development plan process (PPR) since this proposal is for the construction of a new tower. There are currently utilities on-site servicing the existing tower, and the same utilities will provide service to the new tower.**

*(2) Compliance with FCC Standards*

*At the request of the PCD Director, which request shall occur no more than once per year, CMRS facility owners and operators shall certify that:*

*The CMRS facility complies with the current FCC regulations prohibiting localized interference with reception of television and radio broadcasts; and*

*The CMRS facility complies with the current FCC standards for cumulative field measurements of radio frequency power densities and electromagnetic fields.*

*In adopting this requirement, the County is not attempting to regulate radio frequency power densities or electromagnetic fields, which regulation is controlled by the FCC.*

**ATC will provide certification at the request of the PCD Director on an annual basis.**

*(3) Abandonment and Expiration*

*If the CMRS facility ceases operation for any reason for a period of one year:*

*El Paso County, Colorado Land Development Code*

*Use and Dimensional Standards – Chapter 5-Page 21 Effective 01/09/2018*

- *The owner or operator shall remove the CMRS facility within 6 months of the expiration;*  
*and*
- *Any permit or approval authorizing the CMRS facility shall be considered expired.*

**ATC shall comply with this provision.**

*(4) Application Approval or Denial*

*In considering an application for a CMRS facility, the County shall base its decision as to the approval or denial of the application on whether the proposed CMRS facility meets the design*

*standards set forth in this Section and any approval criteria associated with the applicable application or review process.*

**The current plans adhere to the design standards set forth in this Section.**

*(5) Accessory Equipment for CMRS Facility*

*All accessory equipment for a CMRS Facility shall be 100% screened from view. All equipment shelters shall be located within the lease area for the CMRS facility. No equipment storage shelter shall exceed 15 feet in height. Equipment storage shelters shall be grouped as closely together as practical, so as to minimize impact on adjoining properties. The total area of all accessory equipment, including equipment storage shelters, shall not exceed 400 square feet per CMRS facility, except for a small cell facility where 17 square feet shall be the maximum allowed.*

**ATC will continue to comply with this requirement, as shown on the construction drawings included with this submission.**

*(6) Standards for Freestanding CMRS Facilities*

*(a) Tower/Structure Removal Agreement*

*Prior to commencing construction of a new freestanding CMRS facility or any alteration of an existing freestanding CMRS facility, a Tower/Structure Removal Agreement shall be signed by the owner of the property and filed for recording with the Clerk and Recorder.*

**ATC shall comply with this provision prior to commencing construction of the replacement tower.**

*(b) Financial Assurance*

*Prior to commencing construction of a CMRS facility, the owner of a freestanding CMRS facility shall be required to provide the County with adequate financial assurance to cover removal of the facility if abandoned. The form of financial assurance shall be approved by the PCD Director.*

**ATC shall comply with this provision prior to commencing construction of the replacement tower.**

*(c) Minimum Setbacks for Freestanding CMRS Facilities*

*(i) Located Within 250 Feet of Residential Zoning District*

*A freestanding CMRS facility located within 250 feet of any property zoned for residential use shall be set back from any residential property line one foot of distance for every foot of facility height (as measured from grade elevation), plus an additional 10 feet.*

**N/A, tower is not located within 250' of a Residential Zoning District**

*(ii) Located Over 250 Feet from Residential Zoning District*

*A freestanding CMRS facility located greater than 250 feet from property zoned for residential use shall meet the minimum setback requirements for structures and structures of the underlying zoning district and located in a manner to contain any freefall or icefall on the same property.*

**As demonstrated in the construction drawings that are included with this submission, the aforementioned setbacks have been met.**

*(d) Maximum Height for Freestanding CMRS Facilities*

*A freestanding CMRS facility, including antennae, shall not exceed the maximum structure height limit in the zoning district unless otherwise specifically authorized as a part of the special use or variance of use approval. Any tower that exceeds 200 feet shall require FAA approval prior to approval of a special use or variance of use.*

**The height of the replacement tower will be 69', thus meeting the maximum height requirements.**

*(e) Administrative Special Use of Variance of Use Amendment.*

*The PCD Director may administratively amend the special use or variance of use approval for a minor modification to the CMRS facility provided the modifications do not constitute a Substantial Change.*

**N/A, the tower replacement with height increase constitutes a substantial change.**

*(f) Design Standards for Freestanding CMRS Facilities*

*A freestanding CMRS facility shall adhere to the following design standards to minimize impacts:*

*(i) Compatible with Surrounding Area*

*A freestanding CMRS facility shall be designed to be compatible with surrounding buildings and structures and existing or planned uses in the area, subject to any applicable FAA regulations.*

**The current/proposed structure is a monopine which blends into the surrounding area, which is primarily agricultural/forest.**

*(ii) Existing Vegetation Existing landforms, vegetation and structures shall be used to screen the facility from view and blend in with the surrounding environment, to the extent practicable. Existing vegetation shall be preserved or enhanced, where feasible.*

**Existing vegetation and structures shall continue to be used to screen the facility, and shall be preserved and enhanced, where feasible.**

*(iii) No Lighting*

*The facility antennae shall not be lighted unless required by the FAA and authorized by the permit or approval.*

**The structure is unlit.**

*(iv) Dangerous Equipment and Attractive Nuisance Any equipment that could be dangerous to persons or wildlife shall be adequately*

*fenced. The attractive nuisance potential shall be minimized through fencing and methods to discourage unauthorized climbing.*

**Leased area and compound are fenced.**

*(vii) Dish Diameter Limited*

*The diameter of a microwave dish antenna shall not exceed 4 feet.*

**N/A**

*(7) Stealth CMRS Facility Design Standards*

*A stealth CMRS facility shall meet the same design standards and maximum height allowance as a freestanding CMRS facility.*

**As demonstrated above, the proposed stealth CMRS facility meets the applicable design standards and maximum height allowances for a freestanding CMRS facility.**

The proposed tower replacement at 2945 Little Turkey Creek Rd, Colorado Springs, CO meets all of the applicable requirements of Section 5.2.19 (B) of the El Paso County Land Development Code. The replacement of the existing facility will allow for additional collocators while not exceeding the Code's maximum height requirements, and the tower will continue to blend within the surrounding area and will not adversely impact adjacent properties. Existing stormwater runoff patterns will also not be affected, since the footprint of the existing tower compound will not be expanded.

Respectfully submitted,

*Heather Carlisle*

Heather Carlisle  
Sr. Counsel, Siting & Real Estate  
[hcarlisle@tilsontech.com](mailto:hcarlisle@tilsontech.com)  
(774) 285-1082