



Rocky Mountain Region  
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8.23.2019

Domenic Martinelli  
LEED GA  
City Planner  
7887 East 60<sup>th</sup> Avenue  
Commerce City, CO 80022

Dear City Planner Domenic Martinelli,

**RE: Narrative to Community Development Comments for D-437-19T, A-1749-H-19 dated 7.22.19**  
RE: AT&T New Proposal for a 70-foot stealth tower at 10391 Luther Court:

AT&T has entered into a lease agreement with Rocky Mountain Lutheran High School, a Colorado non-profit corporation to lease approximately 750 square feet of ground space and erect a 70-foot stealth tower that will blend and match with the existing school building.

The purpose of the 70-foot stealth tower and related equipment is to provide the local community with enhanced AT&T cellular (CRMS) service. Currently in the community AT&T coverage is not adequate. By approving the Application presented, AT&T can improve and provide better communication with first responders, residences and businesses in the community.

AT&T has engineered this site proposal as a macro site, meaning maximum coverage for that specific location. In order for AT&T to reach the maximum coverage objective in the community a center line for the antennas was calculated and engineered to be at 62 feet (the technology calls for 8-foot antennas putting the tip of the antennas at 66 feet). The Commerce City staff has recommended that the proposed tower has a peaked roof or a clock tower. In order to design for that recommendation an added height was needed to complete the design.

- a. AT&T is trying to fill in gaps in the current coverage in the community. The terrain and amount of current AT&T users and future AT&T consumers will grow over time. Under Commerce City code this also leaves enough space for a future colocation tenant. The location was more desirable because of its easterly location overlooking the western businesses and residential community, and the new and residential community to the north, south and east, and the proximity to power and fiber along 104<sup>th</sup> Avenue.
- b. Please see attached AT&T coverage map which also shows existing AT&T locations and a before and after coverage plot.
- c. Please see additional RF engineer email of explanation.

Per LDC Section 21-5603-3A there are no towers in Commerce City city limits within 2000 feet.

There is however a tower within 2000 feet of the proposed AT&T site, but that tower is in Adams County. That tower is structurally full and does not have any colocation space available at the desired height required by AT&T.

- a. Please see attached email from AT&T engineer with a map and explanation.

Per LCS Section 21-3220 4A & 4B, i, ii, iii, iv:

- a. 4A-the height is required because of the limitation of the height restriction in the PUD. In order for AT&T to adequately provide the service to the surrounding business and residential community a height variance is needed with the antenna tip at 66 feet. Other factors play into the reason for a height variance, terrain, location of existing AT&T sites in the larger radius area of coverage, future growth to the community and the future building growth of Rocky Mountain Lutheran High School.
- b. (i)-Commerce City staff made recommendations during the pre-application meeting and 1<sup>st</sup> review comments from the 7.22.19 Development Comments and AT&T has made adjustments to be more in line with the recommendations presented by Commerce City Development Community staff.  
(ii)-The proposed tower will have minimal effect upon adjacent properties. To the near south is the Xcel power towers and lines with an Xcel easement, to the west is Rocky Mountain Lutheran High School land and further to the west open land, to the north is the Right of Way (104<sup>th</sup> Street) and further to the east is Adams County and further still a Commerce City residential community, to the east is Rocky Mountain Lutheran High School land and a future Lutheran Church location. Because of the location of the proposed site solar access, visual access, rights of privacy, light and air are not impacted and will have minimal effect on the adjacent parcels.  
(iii)-Commerce City public service will not be impacted in providing public services. The proposed site is adequately placed on the parcel that it will not interfere with any road ways, utilities or Commerce City needed services.  
(iv)-The height exception would not interfere with or complicate emergency services, if anything the proposed AT&T site can improve the wireless service in the community and provide better communication for AT&T customers with first responders, residences and businesses in the community.

AT&T has taken the staff recommendation and has incorporated a peak roof into the overall design of the tower that will give the tower a completed design.

AT&T customers will enjoy enhanced wireless coverage. AT&T understands the impact a visual telecommunication facility has on the community. AT&T entered the pre-application meeting with Commerce City, City Planner Domenic Martinelli. City Planner Domenic Martinelli wanted a more community friendly stealth design. During the pre-application meeting City Planner Martinelli was concerned that the design presented did not blend well with the existing school building and that the proposed tower would need to be more appealing visually to the community. AT&T understood and took City Planner Martinelli comments and redesigned the tower to the proposal that is now being submitted for approval.

Because of City Planner Martinelli suggestions AT&T redesigned the tower to mitigate any negative impact with paint and brick to match the school building and with fiberglass panel screens to hide the antennas. Plus, the design has also incorporated a peaked roof. The lease area wall that AT&T will be building will be 6 feet high with brick to match the school building, this brick wall will shield the AC units and a natural gas generator with landscaping plants on the two public visual walls.

The proposed 70-foot tower is also designed as a colocatable structure.

For AT&T and a possible future carrier to occupy the tower the height requested would be necessary to meet the coverage objective of the occupants inside the stealth tower and for the community in the surrounding area.

Thank you for your review, time and effort.

John Marriott  
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