

**SPECIAL USE PERMIT**  
**MESA BOARD OF ADJUSTMENTS, BOA25-00072**  
January 10, 2025, *revsd February 21, 2025*

**1. Proposal Summary Information**

Crown Castle Site:	Grace Church 824288
Prepared by:	Michael J Campbell Campbell A&Z, LLC 6880 W. Antelope Dr Peoria AZ 85383  Ryan Quintel Crown Castle 2055 S. Stearman Dr. Chandler, AZ 85286
Prepared for:	Crown Castle 2055 S Stearman Dr Chandler AZ 85285
Property Owner:	Grace Evangelical Free Church 8701 E Brown Rd Mesa AZ 85207
Request:	Special Use Permit Wireless Communication Facility Board of Adjustments
Site Location:	8701 E Brown Rd.
Legal Description:	A portion of the Section 25, Township 2 North, Range 6 East of the G&SRBM, Pima County, AZ
APN#:	218-07-014j
Zoning:	R-43

**2. Introduction**

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Crown Castle, a wireless communications infrastructure company operating in the City of Mesa, AZ, owns and operates the Wireless Communications Facility located at 8701 E Brown Rd., at the campus of the Grace Evangelical Free Church, ("Existing Site"). The Existing Site accommodates T-Mobile Wireless. The

carrier has provided wireless communications coverage in the area for the last 17 years. The site was approved by the City and built in 2006/2007.

Crown Castle is one of the largest providers of shared communications infrastructure in the United States, with approximately 40,000 cell towers comprising approximately 91,000 installations. Crown Castle's extensive infrastructure serves as the backbone of the nation's communication network. The Existing Site is a critical component of that network, will provide Network continuity for the public interest, continuing 911-call service and long-term stability for T-Mobile current service levels in the City.

### **3. Project Goals**

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The goal of this application is to maintain continued coverage of this area by the proposed wireless facility. The existing disguised wireless cross site on the Church campus is no longer a viable structure for T-Mobile. T-Mobile is requesting a modification to the antenna array that does not fit inside the cross structure. This replacement site designed as a monoeucalyptus will allow for T-Mobile to install their required antennas and to provide continued wireless services to the community for emergency services, business, and personal use. The monoeucalyptus design is a light-colored tone structure that blends into the surrounding area with adequate branching and leaves.

**Existing Site**



This proposal describes the scope of the proposed project by providing specific information regarding the project location, zoning, specifications, in relation to the City of Mesa code requirements pertaining to Wireless Communications Facilities (WCF).

It is Crown's desire to work with the City to ensure that the project is consistent with the City's development guidelines and its surroundings while maintaining the existing wireless communications coverage that is critical for emergency, business, and personal use.

#### 4. Request

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This application submittal anticipates that the following formal request be made to the City of Mesa

- Special Use Permit, Board of Adjustments

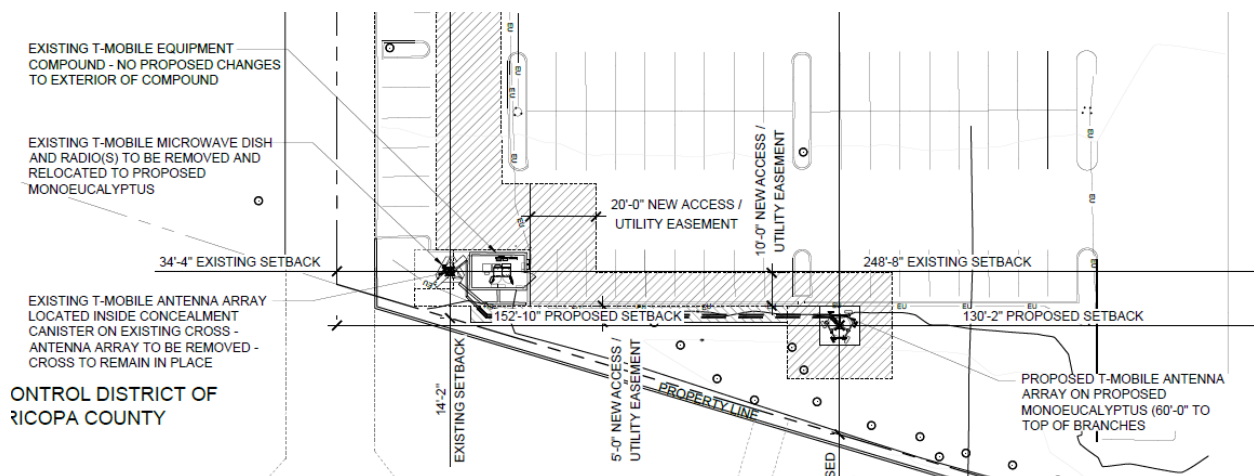
#### 5. Project/Site Description

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The Proposed Relocation Site will be relocating from the Existing Cross Site. The existing WCF is approx 75' west of the proposed replacement monoeucalyptus site. This relocation/redsigned structure will also allow T-Mobile to deliver improved Network services to their customers in this area.

The location of the Proposed Relocation Site will allow for the carrier to closely mimic their current network coverages without major impact to service levels and quality and avoiding the creation of new coverage gaps.

#### Proposed Site Location with Existing Site Location

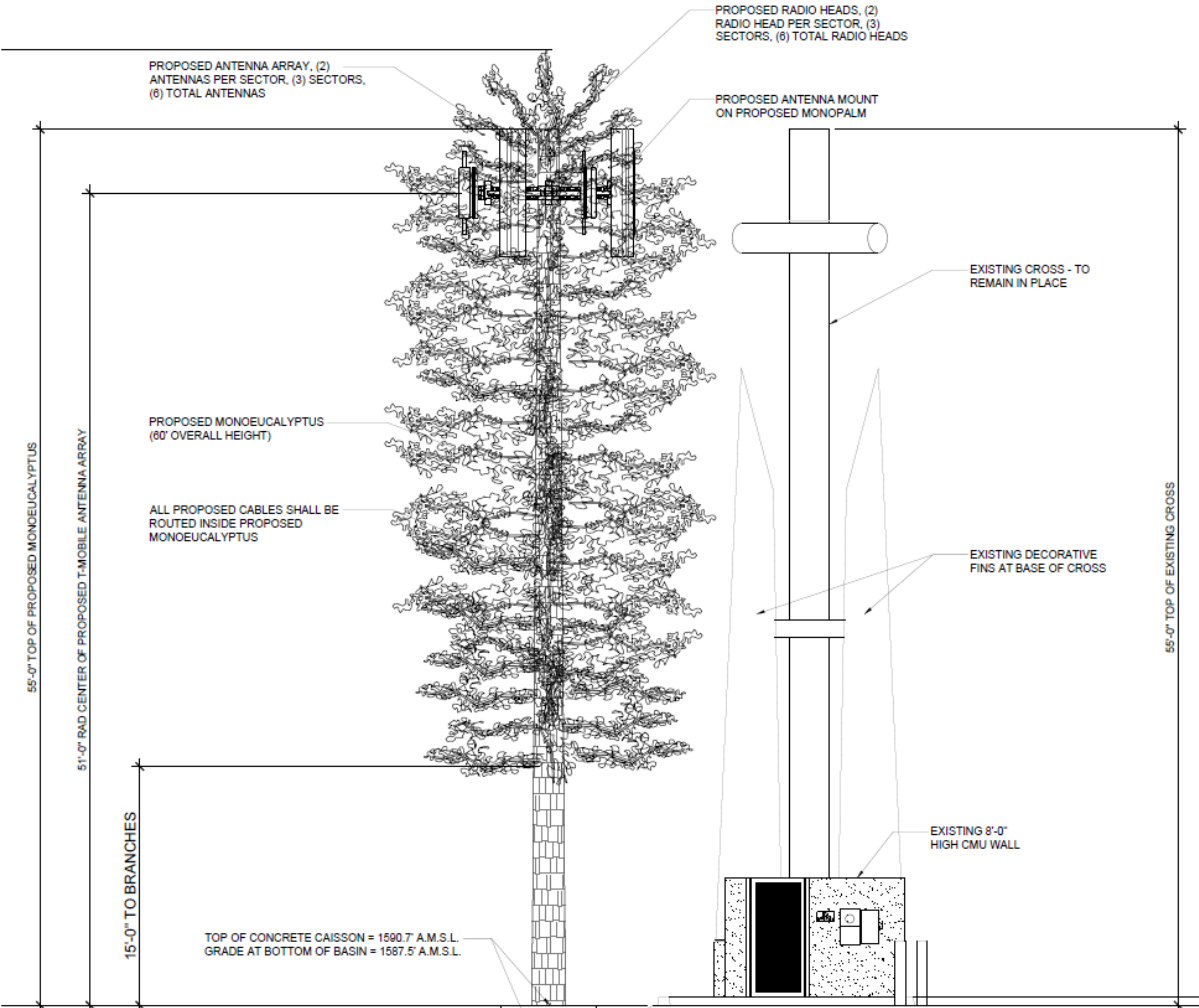


Crown Castle desires to construct a new 60' mono-eucalyptus, with the Planning Staff's concurrence. The mono-eucalyptus design is more compatible with the area. T-Mobile as the anchor tenant will be able to provide continued service to the community and to provide co-location opportunity to other carriers at this northeast Mesa location.

**The existing carrier equipment compound will not be modified with this SUP request.**

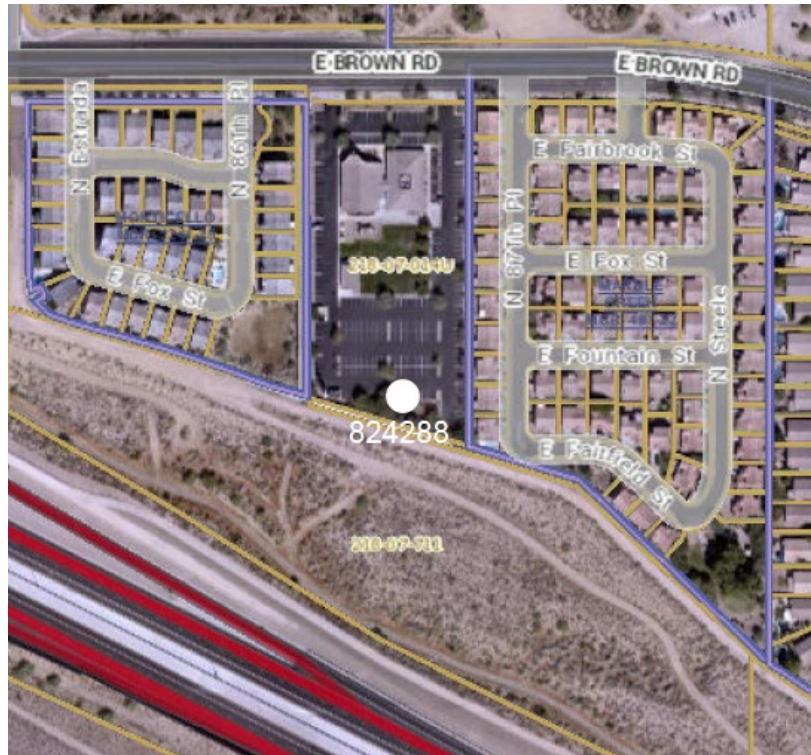


Proposed Site w/ the mono-eucalyptus





### Proposed WCF Location



The proposed structure will follow all City building codes and design standards as directed by the Building Safety Department.

*Project Data Table*

Site Development Regulations	Existing	Proposed
<b>Current Height</b>	55'	60'
<b>Setbacks</b>	N/A	Meet or exceed
<b>Setback non-residential</b>	N/A	N/A
<b>Setback from residential</b>	N: 470', S: 14', E: 248', W: 34'	N: 520', S: 33', E: 130', W: 152'
<b>Landscape</b>	N/A	*requesting a waiver

## 6. Site Justification

### 1. MZO Section 11-70-5E SPECIAL USE PERMIT

- Required Findings. A SUP shall only be granted if the approving body determines that the project as submitted or modified conforms to all of the following criteria. If it is determined that it is not possible to make all of the required findings, the

application shall be denied. The specific basis for denial shall be established in the record.

2. Approval of the proposed project will advance the goals and objectives of and is consistent with the policies of the General Plan and any other applicable City plan and/or policies.
3. The location, size, design, and operating characteristics of the proposed project are consistent with the purposes of the district where it is located and conform with the General Plan and with any other applicable City plan or policies.
4. The proposed project will not be injurious or detrimental to the adjacent or surrounding properties in the area, nor will the proposed project or improvements be injurious or detrimental to the neighborhood or to the general welfare of the City; and
5. Adequate public services, public facilities and public infrastructure are available to serve the proposed project.

The Applicant understands and agrees with MZO Section 11-70-5(E), Special Use Permit.

**2. MZO Section 11-35-6(E):**

1. The proposed telecommunication facility will comply with all applicable State and federal standards and requirements.
2. The proposed project is consistent with the general requirements of the Chapter and any specific requirements applicable to the proposed facility.
3. The proposed antenna or related facility, operating alone and in conjunction with other telecommunication facilities, will comply with all applicable State and federal standards and requirements; and either:
  - a. Will not be readily visible; or
  - b. Will be readily visible but is not feasible to incorporate additional measures that would make the facility not readily visible.
4. The facility, if it is not a microcell or co-located, is necessary to prevent or fill a significant gap in coverage or capacity shortfall in the applicant's service area, and is the least intrusive means of doing so.
5. If the proposed facility is a satellite dish or parabolic antenna exceeding 39 inches in diameter, a smaller or less intrusive antenna cannot feasibly accomplish the provider's technical objectives and that facility will not be readily visible.
6. If a new antenna support structure is proposed or the applicant proposes to extend the height of an existing tower, that the applicant has made good faith and reasonable efforts to locate on a telecommunication facility on a support structure other than a new monopole or lattice tower or to accomplish co-location and that no existing tower or structure in the vicinity can accommodate the applicant's proposed antennas.
7. If a modification of height, separation, setback, landscaping, or other requirements of Section 11-35-5 is proposed, that the proposed modification is consistent with the purposes of this Chapter and will be the least intrusive feasible means of meeting the service provider's objectives.

The Applicant will be in compliance of the standards as set forth in Section 11-35-(6) as noted above.

**Other:**

1. **Owner Letter of Authorization**, City of Mesa form, attached hereto.

2. **Aerial overlay on the Site Plan**, included in the updated Site Plan.
3. **Landscape Plan** requirement:

Crown Castle respectfully requests a waiver from the landscape requirement as the equipment compound currently sits in the asphalt parking lot on three sides, and the fourth side is adjacent to a drainage path. The equipment compound is very recessed in the campus property and not visible to traffic on Brown Rd.

The replacement monoecalyptus is set in a landscape area that has mature trees in and around it. Also, the placement of the monoecalyptus in the southern end of the campus, is well screened at street level by the Church buildings and the property wall along the south boundary.

#### **Least Intrusive Means to Fill a Significant Gap in Coverage.**

Section 332(c)(7)(B)(i)(II) of the Federal Telecom Act bars local governmental decisions from precluding the provision of wireless services:

The regulation of the placement, construction, and modification of personal wireless service facilities by any State or Local government or instrumentality thereof—

(II) shall not prohibit or have the effect of prohibiting the provision of personal wireless services.

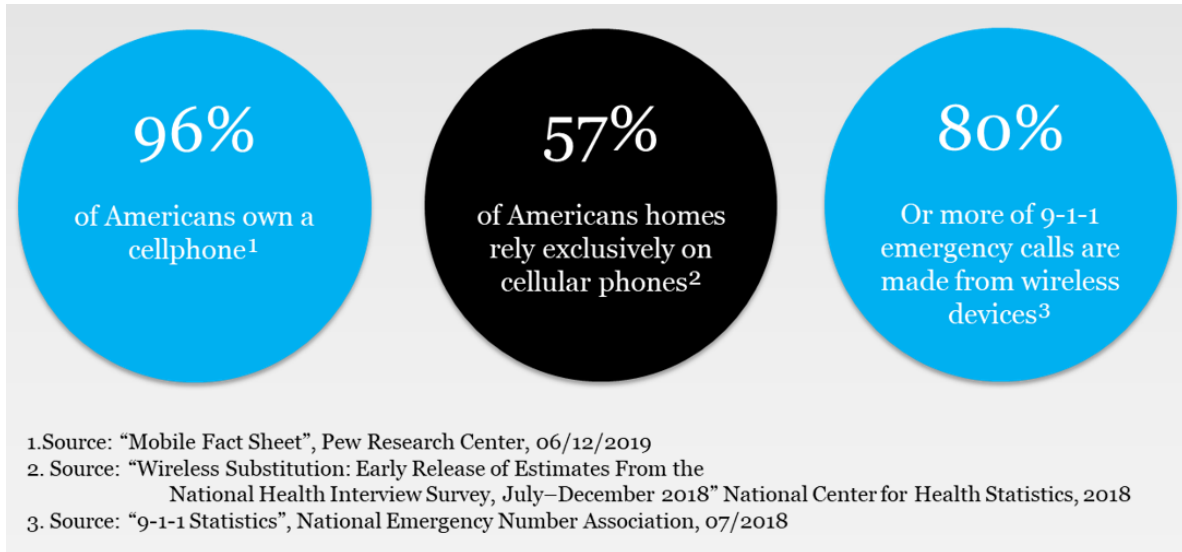
The search area in which a site can be relocated is limited because each site is a link in a chain of sites and cannot move very far in any direction once the network has been established. Moving too far one way or another would cause interference or create a gap in coverage.

This relocation/redesigned site is unique in that we were able to locate a place on the existing property that would accommodate the replacement tree, while minimally impacting the operations of the Church and meets the requirements of the Mesa Zoning Ordinance for WCFs. There was no need to look elsewhere for a replacement site.

Wireless telecommunications are the primary mode of communication for Americans in the twenty-first century. That fact is amply demonstrated by the latest surveys in the industry, which reveal that over 50 percent of American homes rely solely on wireless devices. Over 90% of households have at least one mobile phone. In a recent report, the “National 911 Program,” which is an office housed within the National Highway Traffic Safety Administration, found that “80 percent of consumers are using cellular phones to make 911 calls.” Wireless communications are a critical part of a community’s health, safety and welfare. Below is a depiction of the statistics of wireless devices usage.



### Wireless Fact Sheet



RF Coverage Map attached

The above comparison map shows the Existing and Proposed Sites, along with the coverage. The coverage is relatively the same and would improve coverage in the service area. North of the site is outdoor recreational areas and trails which would be better served by the proposed location.

## 7. Zoning

The Proposed Relocation Site is zoned RS-43 within the City of Mesa. The adjacent parcels to the subject site are zoned RS-9, RS-43, RM-2 & RSL 2.5. The City of Mesa Zoning ordinance allows for telecommunications facilities within in these zones with a 2:1 set-back standard. The use of the existing site is a landscape buffer on the Church campus. Below is a matrix table showing the distance from residential uses in the near vicinity. The proposal complies with the Mesa 2040 General Plan by expanding technology use by creating access to information and creating a safe, clean and healthy living environment.

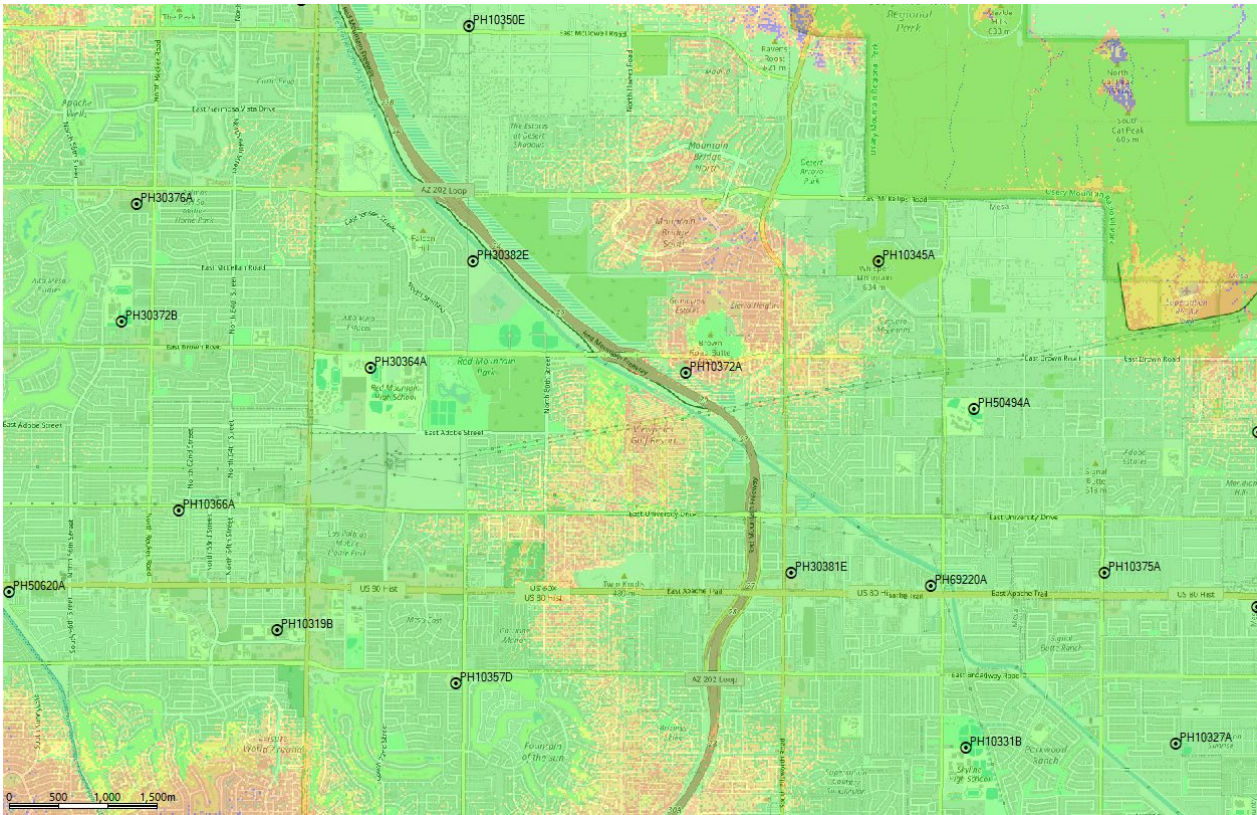
Zoning Project Data Table

Direction	Existing Zoning	Existing Use
Site	RS-43	Church landscape area
North	RS-9	Brown Rd & residential
East	RM-2	Residential
South	RS-43	MCFCDD
West	RSL 2.5	Residential



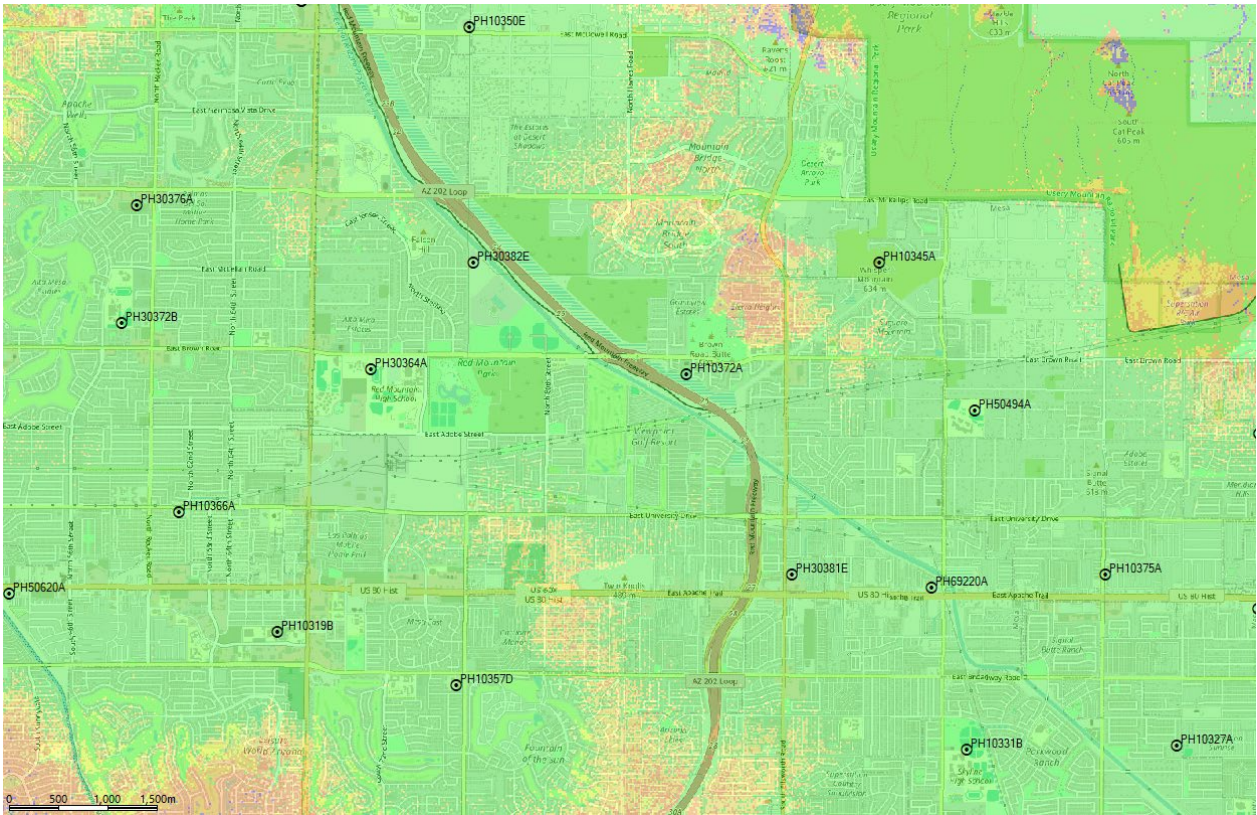
# Highlights in Coverage

N25 NR1900MHz Existing Coverage in Area of Map



- Best RSRP
- IBC: -89dBm < RSRP
  - IBR: -94dBm < RSRP < -89dBm
  - In-Vehicle: -102dBm < RSRP < -94dBm
  - Outdoor: -109dBm < RSRP < -102dBm

N25 NR1900MHz Planned Coverage in Area of Map



- Best RSRP
- IBC: -89dBm < RSRP
  - IBR: -94dBm < RSRP < -89dBm
  - In-Vehicle: -102dBm < RSRP < -94dBm
  - Outdoor: -109dBm < RSRP < -102dBm



*Distance from surrounding Residential*

Direction	Distance	Existing Use
North	520'	RS-9
East	130'	RM-2
South	33'	RS-43
West	152'	RSL 2.5

Mesa Zoning Map



Crown 824288

## 8. Analysis of Federal Law

### 1. Federal Telecommunications Act of 1996

In addition to local and state law, this application is governed by the federal Communications Act, 47 U.S.C. § 332(c)(7)(B). In the Telecommunications Act of 1996, Pub. L. No 104-104, 110 Stat. 56 (“Telecom Act”) Congress added Section 332(c)(7)(B), which provides rights to wireless service providers and establishes limitations upon state and local zoning authorities with respect to applications for permits to construct wireless service facilities. The express purpose of the Act is “to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers.” Pub. L. No. 104-104, 110 Stat. 56, 56 (1996); see also *City of Rancho Palos Verdes v. Abrams*, 544 U.S. 113, 115 (2005). It also is intended to “encourage the rapid deployment of new telecommunications technologies.” *Id.*; see also H.R. Conf. Rep. No. 104-458, at 113 (1996) (purpose of

the 1996 Act is “to provide for a pro-competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services . . . by opening all telecommunications markets to competition”).

Recognizing that wireless service can bring enormous benefits to communities and can boost jobs and economic productivity, this important law and subsequent regulations applicable to wireless facilities, were enacted to remove impediments to and promote the rapid deployment of wireless technology on a national basis.

The applicable limitations and directives include the following:

- (a) State and local governments may not unreasonably discriminate among providers of functionally equivalent services (§332(c)(7)(B)(i)(I)).
- (b) State and local governments may not regulate the placement, construction or modification of wireless service facilities in a manner that prohibits, or has the effect of prohibiting, the provision of personal wireless services (better known as the “effective prohibition clause”) (§332(c)(7)(B)(i)(II)).
- (c) State and local governments must act on requests for authorization to construct or modify wireless service facilities within a reasonable period of time (§332(c)(7)(B)(ii)).
- (d) Any decision by a state or local government to deny a request for construction or modification of personal wireless service facilities must be in writing and supported by substantial evidence contained in a written record (§332(c)(7)(B)(iii)).
- (e) Finally, no state or local government or instrumentality thereof may regulate the placement, construction or modification of personal wireless service facilities on the basis of the perceived environmental effects of radio frequency emissions to the extent that such facilities comply with federal communications commission’s regulations concerning such emissions (§332(c)(7)(B)(iv)). See Proof of FCC Compliance attached as Exhibit 1.

Rapid deployment of wireless facilities is an important national issue, especially given the trend of Americans eliminating traditional landline service in favor of wireless communications. The Center for Disease Control and Prevention (“CDC”) tracks “wireless substitution” rates as part of its National Health Interview Survey and publishes the findings every six months in its Wireless Substitution reports. The most recent report, issued in December of 2019, estimates that more than one-half (57%) of American homes have only wireless phones.

Reliable and robust wireless communication is essential, especially considering over half of Americans and Coloradans do not have a landline and rely on wireless service to conduct personal and business communications, to access the internet or to reach emergency responders. Ensuring access in the event of an emergency is critical for communications between emergency service personnel or for people calling for help.

## 9. Conclusion

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Crown Castle is seeking approval for the Special Use Permit WCF within the Grace Evangelical Free Church property. By approving this application for the Proposed Site within City Mesa jurisdiction. Crown has designed the monoeucalyptus to be consistent with development code and the uses.

- The Proposed Site will not cause an adverse impact on adjacent property or properties in the area.
- The Proposed Site will not cause a significant increase in vehicular or pedestrian traffic in the adjacent areas.
- The Proposed Site will not cause the emission of odor, dust, gas, noise, vibration, smoke, heat or glare at a level exceeding ambient conditions.
- The Proposed Site will not contribute in a measurable way to the deterioration in the neighborhood or area or contribution to the lowering of property values.

## 10. Attachments

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- Site map
- Zoning Drawings
- Property Owner's Authorization Signature Form
- Photo-sims

On behalf of Crown Castle, I respectfully submit this package for your review and consideration. Upon completion of your review, please contact me if you have any questions or need additional information.

Sincerely,

*Michael J Campbell*

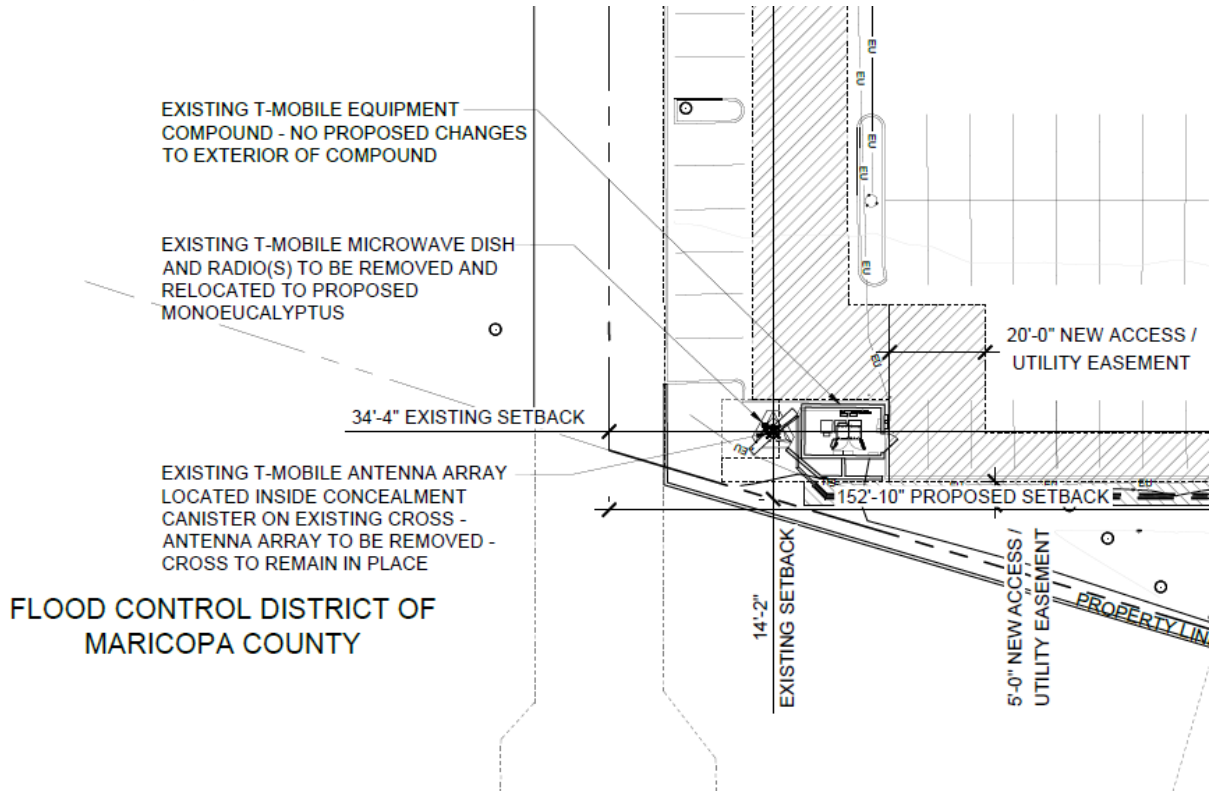
Michael J Campbell  
Campbell A&Z, LLC  
602-616-8396, mobile  
623-376-6380, office  
[campbellaz1@earthlink.net](mailto:campbellaz1@earthlink.net)

## RESPONSE TO STAFF COMMENT REPORT OF 2/5/25

### Planning Review

1. Noted
2. Balance due, *payment completed 2/20/25*
3. Noted
4. Noted
5. Planning Staff is unable to determine if the existing lease area equipment area will be decommissioned and removed and replaced, or if the existing shelter will be used for the new WCF. Provide additional information:

*The existing equipment area, with the existing carrier equipment cabinets will not be modified to the public's view. As stated on the Site Plan A-1 sheet and as noted on page 4 of the Project Narrative:*



### 6. Landscape Plan:

1. Per Section 11-35-5(H) sites with antennas, antenna support structures, and related equipment shall have a standard buffer consisting of a continuous landscape strip with a minimum



radius of 4' around the perimeter of the installation. Existing mature tree growth and natural landforms the site shall be preserved to maximize to the extent possible. In some cases, towers sited on large lots, natural vegetation around the property perimeter may serve as a sufficient buffer. Per the submittal plans, it appears there is existing mature tree plantings adjacent to the proposed facility. Provide a landscape [plan that demonstrates compliance with the above standard. Additional landscaping may be necessary to screen the enclosure: landscaping shall be compatible with the Desert Uplands plant list.

*The existing carrier equipment enclosure is set in the southwest corner of the asphalt parking lot. The enclosure was approved in 2007 without added landscaping. The enclosure has asphalt on the north and east sides, the existing WCF cross on the west and a gravel slope to the south that enters a drainage path. The enclosure is not visible to the general public with exception to a minimal visibility window from commuters along Brown Rd at the west entry drive to the Church property. I respectfully request a continued waiver of the landscape requirement for the existing WCF equipment enclosure.*

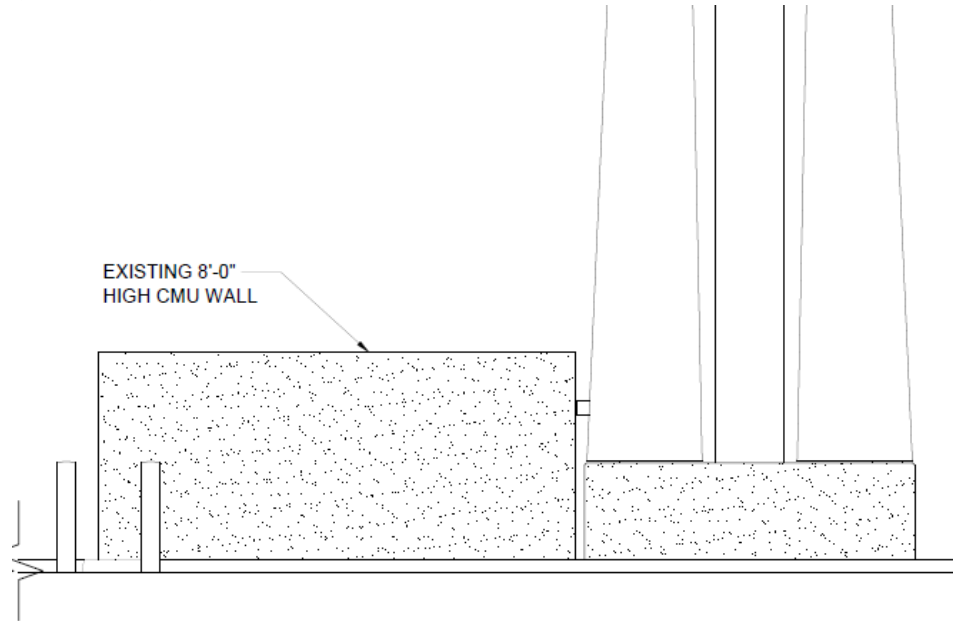
2. Provide a digital Color and Material Board for the proposed mono-eucalyptus. The tree bark and leaf colors should be selected to match the surrounding vegetation.:

*See attached color and material board. The mono-eucalyptus concept is shown in the Valmont Larson brochure. The same type of tree was approved in a Crown Castle WCF also located in the Desert Uplands overlay. That was BOA 20-00806, March 3, 2021. The WCF was not constructed due to the carrier's decision to cancel the project.*

7. Lease area cut-sheet:

1. Provide a cut-sheet of the proposed equipment area screening, Per Section 11-35-5(D), antenna support equipment for stand alone facilities (not attached to a building) shall be screened by

a minimum 6' high masonry wall unless placed within a fully enclosed building. Provide paint to match existing buildings. *The existing equipment enclosure is screened by an 8' tall cmu block wall as shown on the A-3 Sheet and below and on page 4 of the Project Narrative and below:*



Inventory/Coverage Map:

1. Revise the submitted coverage map to highlight the area of the proposed WCF.

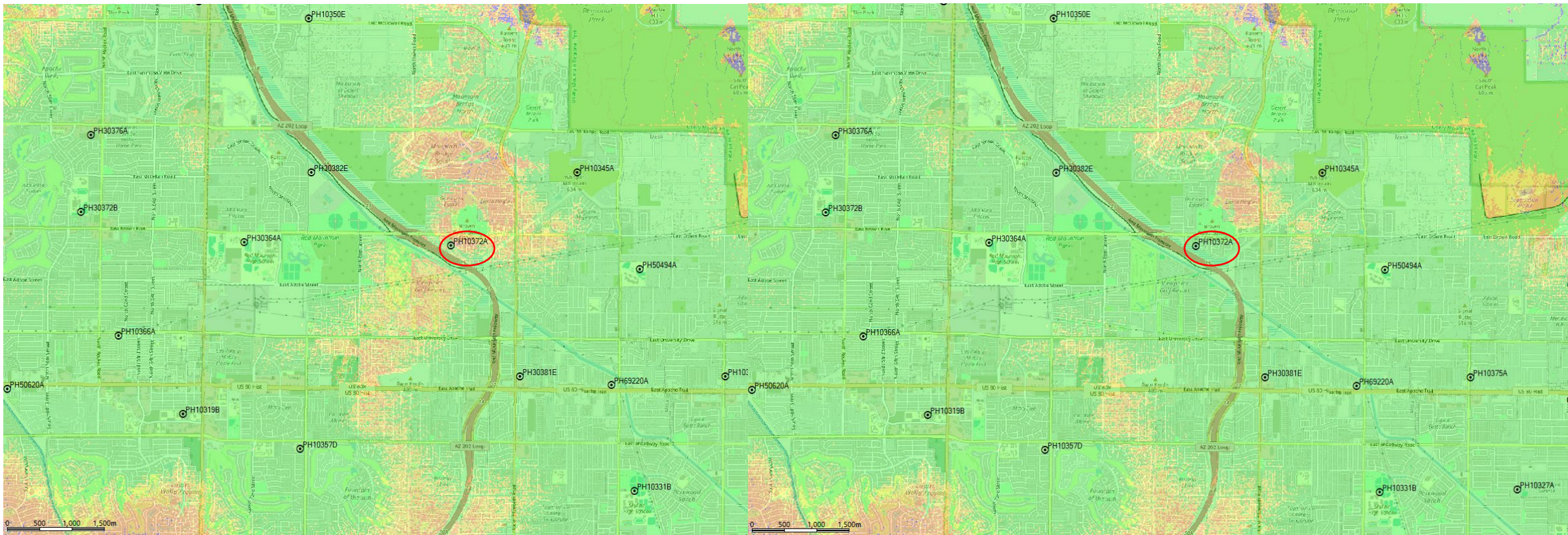
*See attached revised coverage map*



# Highlights in Coverage

N25 NR1900MHz Existing Coverage in Area of Map

N25 NR1900MHz Planned Coverage in Area of Map



Nearest Site – PH10345 (1.4 miles)

Significantly improves ultra capacity 5G (T-Mobiles fastest 5G) in the neighbors surrounding the site, which will increase data speeds, consistency of coverage and availability of low-cost high speed internet. This would include the viewpoint RV and Golf resort, Desert vista estates, pacific mobile manor, Salerno ranch and Madrid neighborhoods.

- Best RSRP
- IBC: -89dBm < RSRP
  - IBR: -94dBm < RSRP < -89dBm
  - In-Vehicle: -102dBm < RSRP < -94dBm
  - Outdoor: -109dBm < RSRP < -102dBm

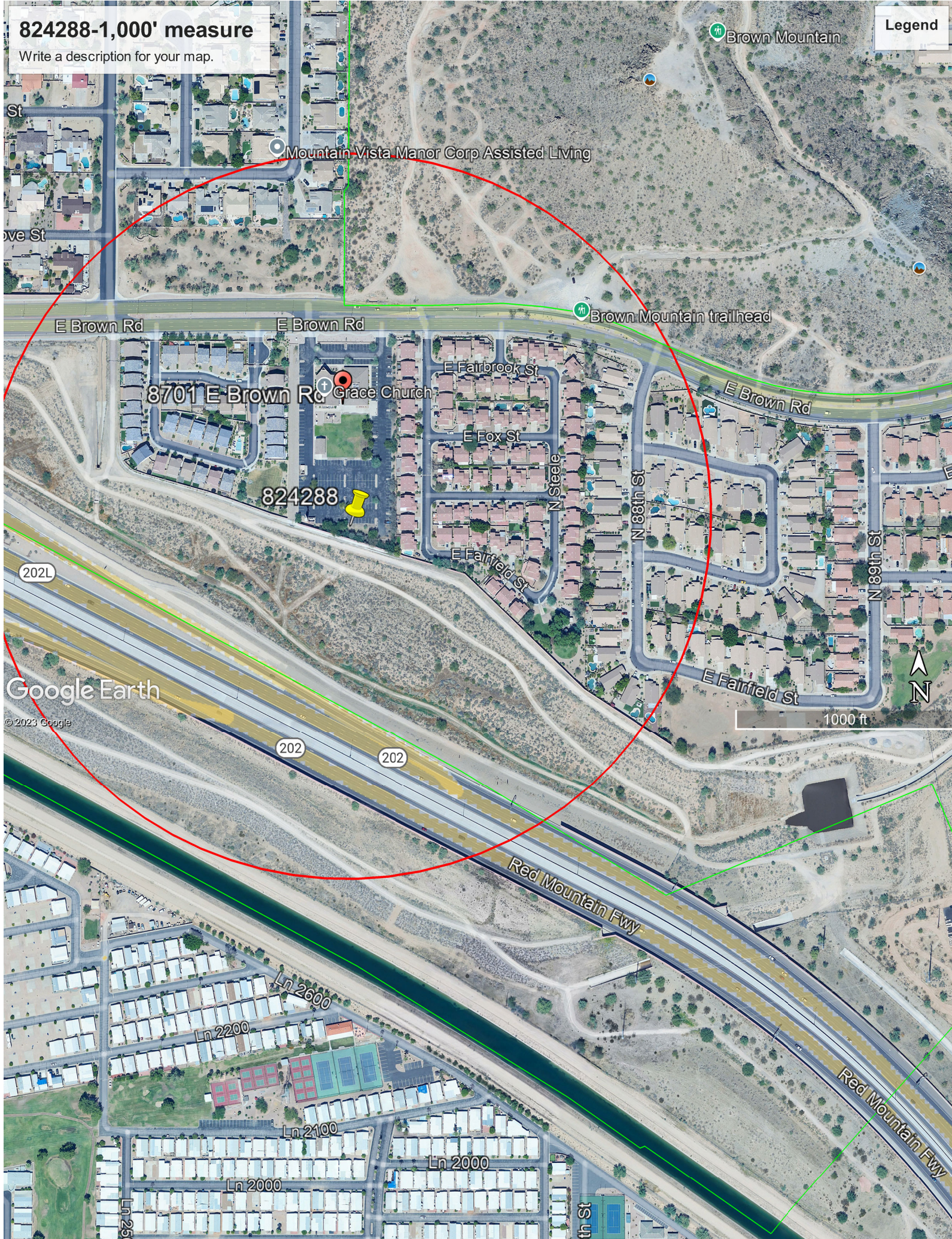
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  - In-Vehicle: -102dBm < RSRP < -94dBm
  - Outdoor: -109dBm < RSRP < -102dBm



824288-1,000' measure

Write a description for your map.

Legend



Google Earth

© 2023 Google



1000 ft



2. Per Section 11-35-5© No new free standing antenna structures shall be located within 1,000' of another free standing facility. Revise coverage map to dimension the distance to the nearest WCF to demonstrate compliance. *See attached revised coverage map from T-Mobile, notes the nearest T-Mobile site at 1.4 miles to the northeast and a Google Earth aerial showing the 1,000' range, evidencing no existing WCFs in the 1,000' range.*

*Please review the above and contact me if you have any questions and/or need additional information.*

*Sincerely,*

*Michael J Campbell, 2/21/25*

*Michael J Campbell*

*Campbell A&Z, LLC*

*602-616-8396*