



PZ-18-00111-02

Application does not meet zoning code requirements for approval

Reasons the application should not be approved:

- ▶ The conditional use permit is not consistent with the objectives of the Zoning Code
- ▶ Result in property devaluation.
- ▶ Potentially detrimental to the public health, safety and welfare.



Applicant has not considered and adequately addressed the following:

- The need for an additional cell tower at the proposed location;
 - Modifications to existing sites
 - Alternative sites THAT EXIST in favorable zones;
 - The availability of 1 or more BUILT and UNOCCUPIED TOWER(S).



Zoning Code – Section, 10-40.60.310

Application does not meet the following requirements:

- Section A.4 - . Maximizing use of existing and future towers to minimize the number of towers needed to serve the City;
- Section A.5 - Locating telecommunications facilities away from residential neighborhoods and historical sites whenever feasible;
- Section E.3 – Applicants proposal includes an incompatible development in a disfavored site without providing sufficient support, justification and documentation;



The chosen location is a disfavored site:

- Residential neighborhoods.
- Scenic locales. Any site along an exposed ridgeline, a public trail, public park, or other outdoor recreation area is a disfavored site



Applicant failed to justify why they are using a disfavored site

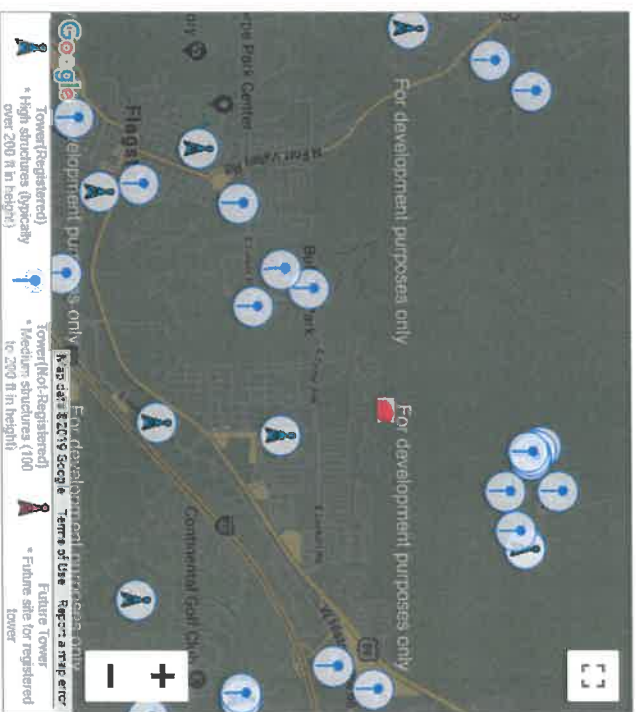
- ▶ Did not provide a map showing all preferred sites in the area.
- ▶ Did not provide justification as to why they are not proposing a preferred site, including:
 - ▶ the best efforts made to secure each of the preferred sites, and
 - ▶ why such efforts were unsuccessful, and
 - ▶ why each of the preferred sites is not technically or legally feasible

Applicant continually provided incomplete and misleading information

Applicant Provided



Actual Tower Locations



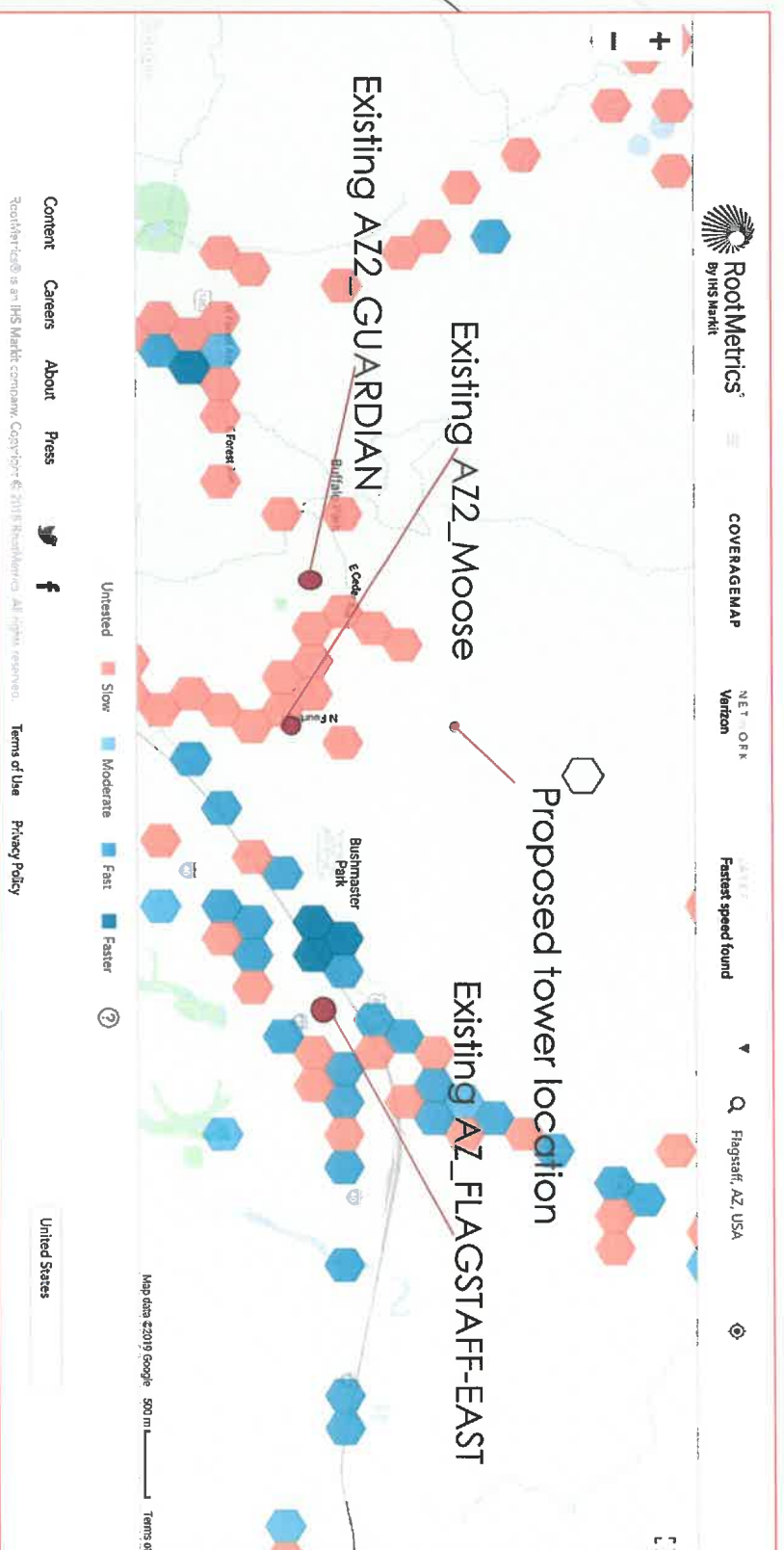


Project Proponent – Stated Objectives:

Offload AZ2_FLAGSTAFF-EAST Gamma Sector

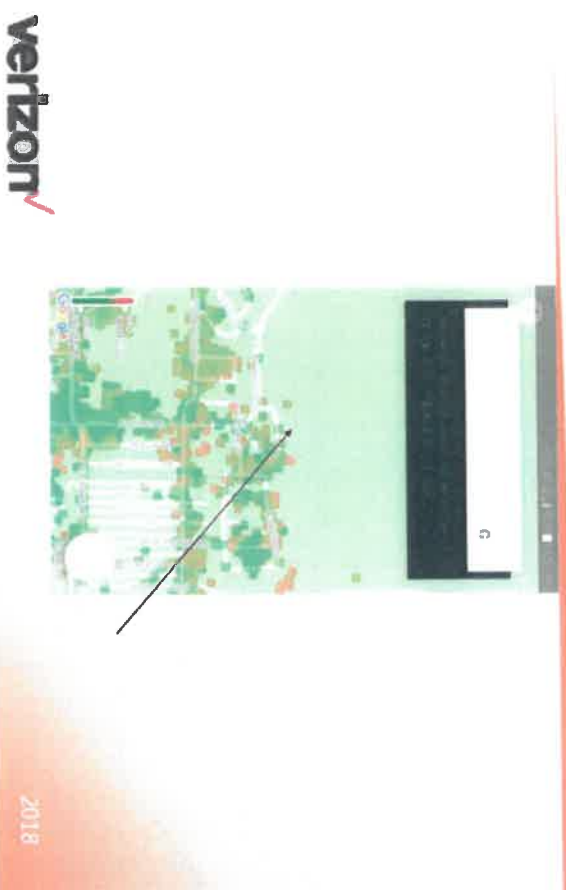
- Sectors facing into area are overloaded, connection demands and low throughput per user.
- New site needed to provide capacity in-building and in-vehicle coverage along East Lockett Road as well as surrounding residential and shopping areas.

How does this support an overloaded sector? This supports an incomplete data set and lack of valuable information.



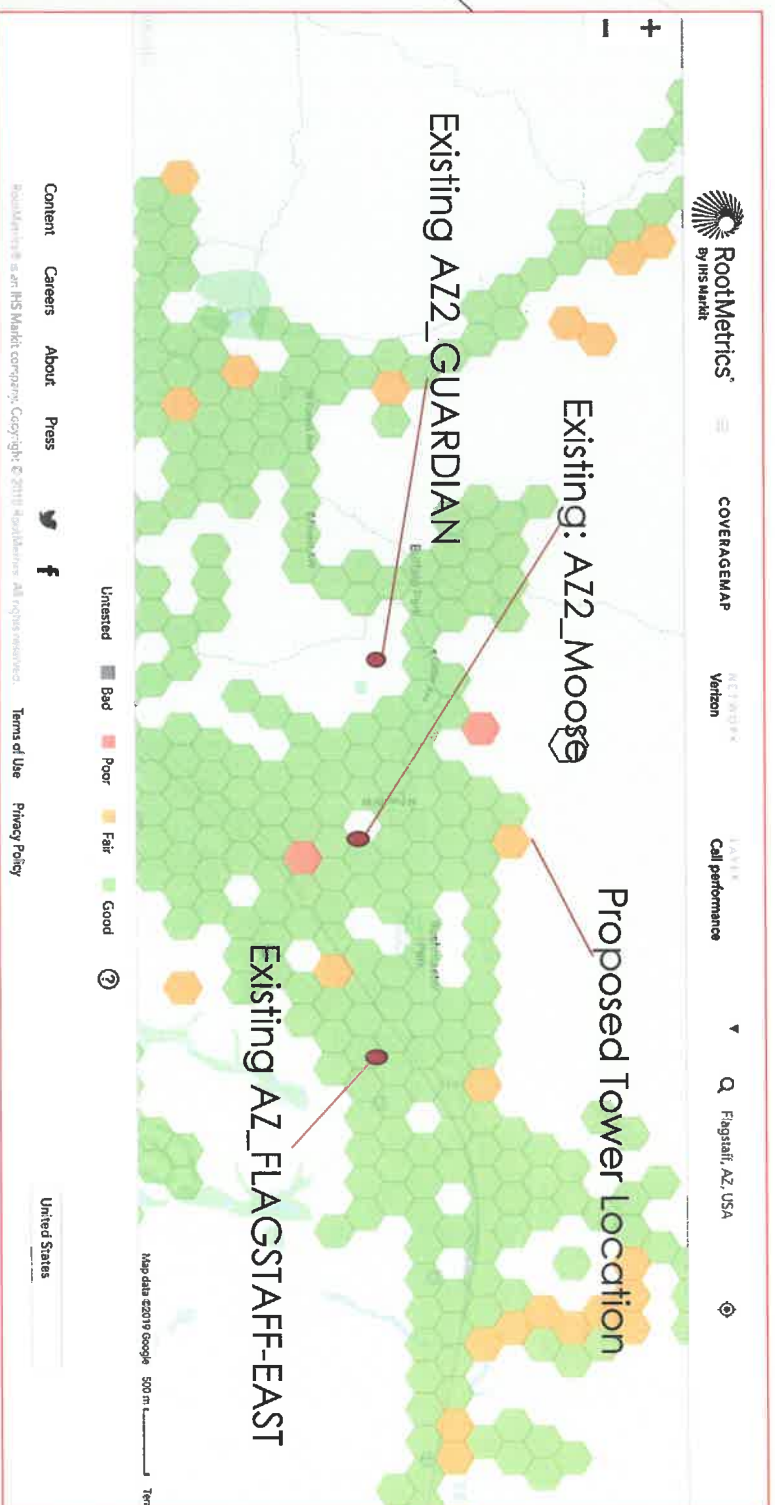
Applicant cherry-picked data

Open Signal – Coverage Map



Open Signal is a free app, available from the Google Play store. The app is dependent upon user-provided data. This image does not support poor coverage in this area, it does indicate that not too many people are using the app and that there is a lot of missing data.

Applicant didn't use this RootMetrics map because it shows sufficient existing coverage

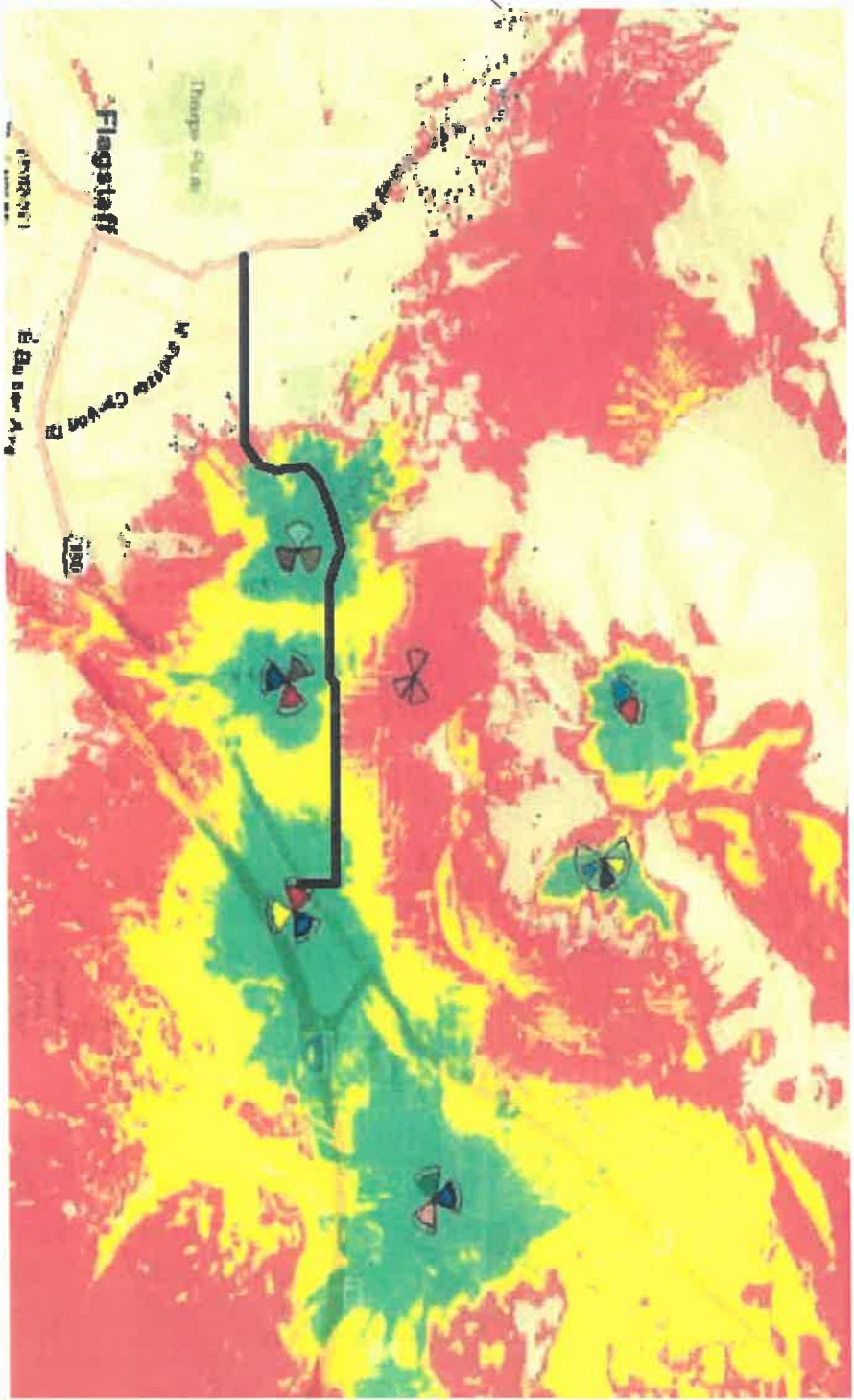




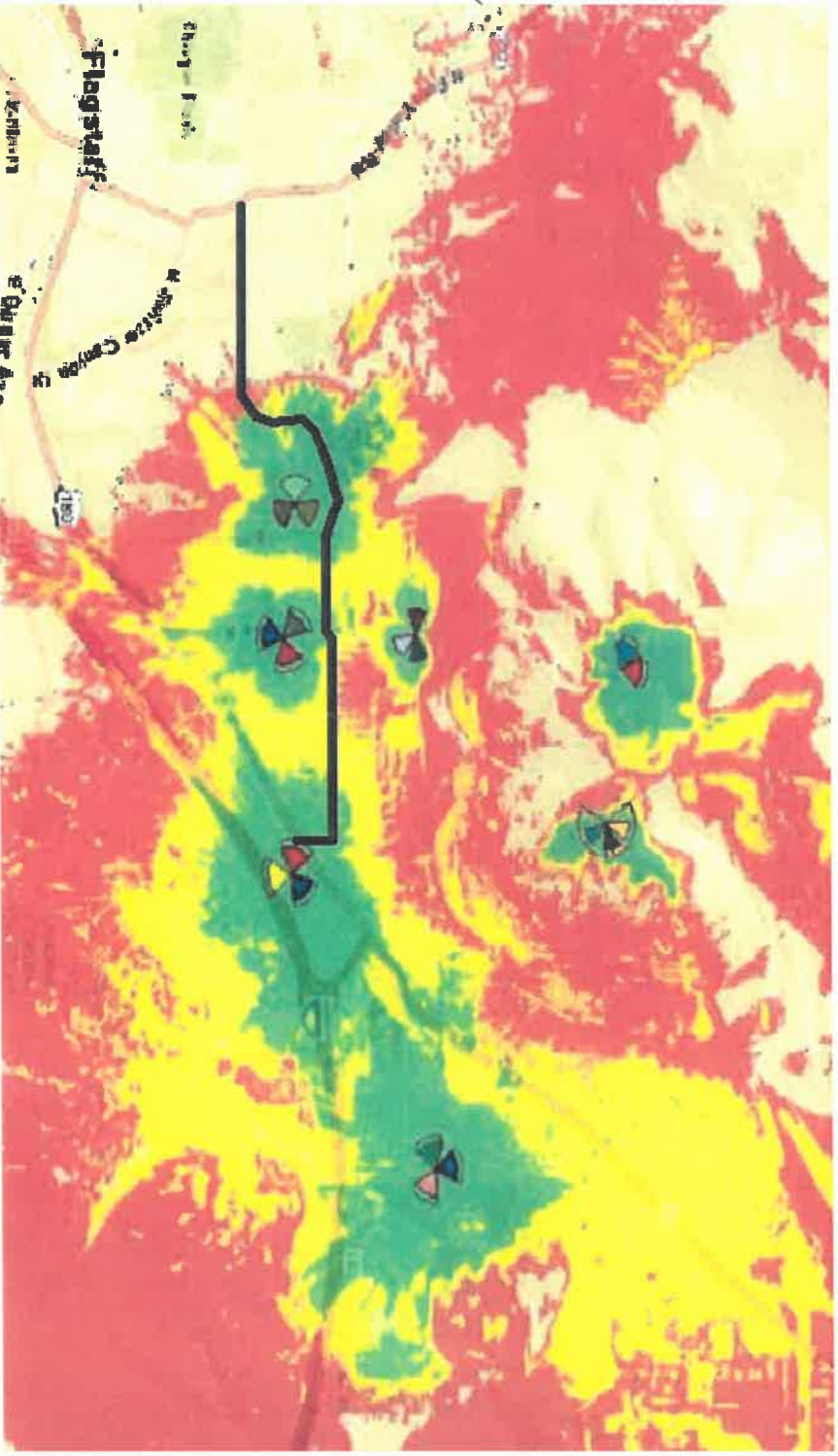
Applicant did not provide support that the site will meet the objective

- ▶ New site needed to provide capacity in-building and in-vehicle coverage along East Lockett Road as well as surrounding residential and shopping areas.
- ▶ Existing towers (AZ2_MOOSE & AZ2_GUARDIAN) are already closer to these areas.
- ▶ NOTE: Shopping Areas would be a preferred location for zoning and planning purposes and should be considered in lieu of the proposed location.

RSRP Current Coverage



RSRP Coverage with new site

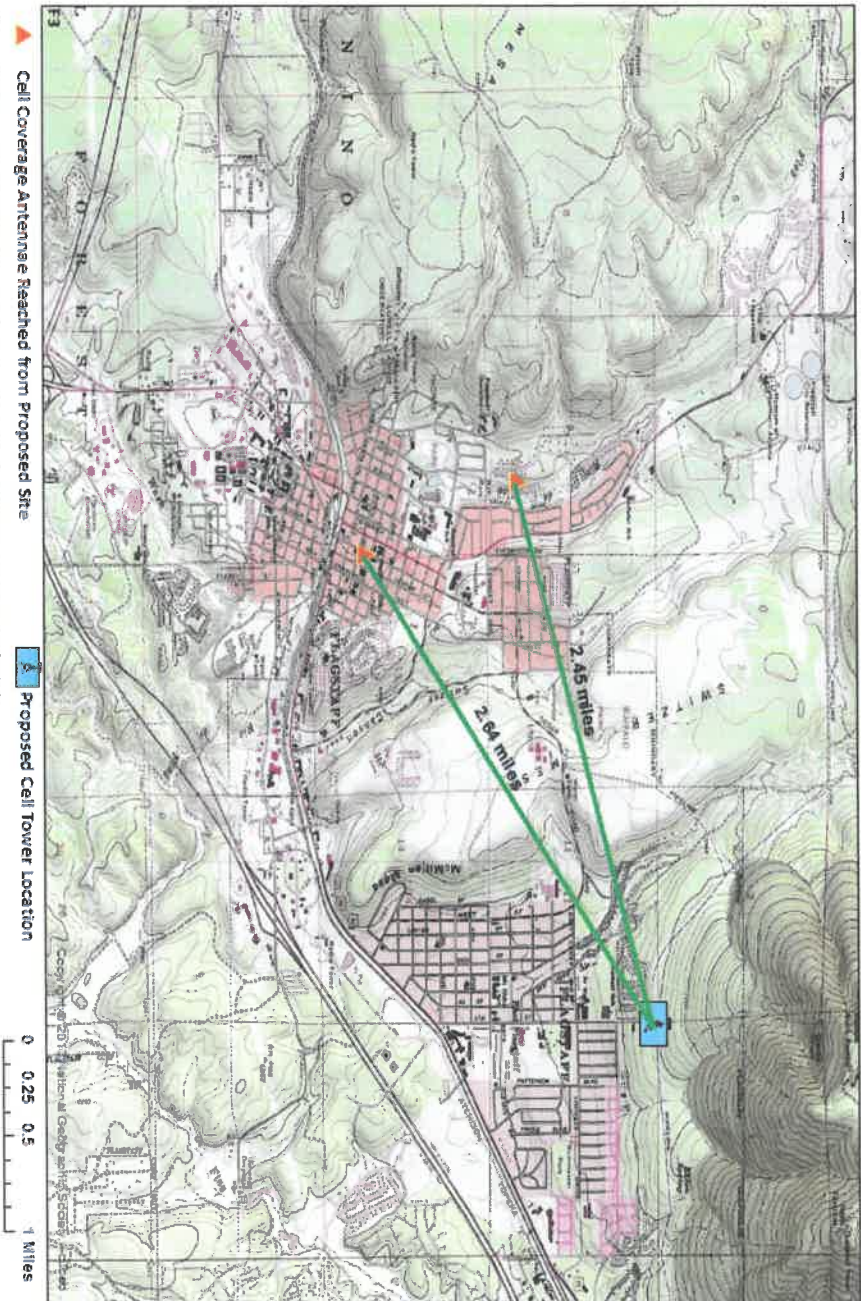


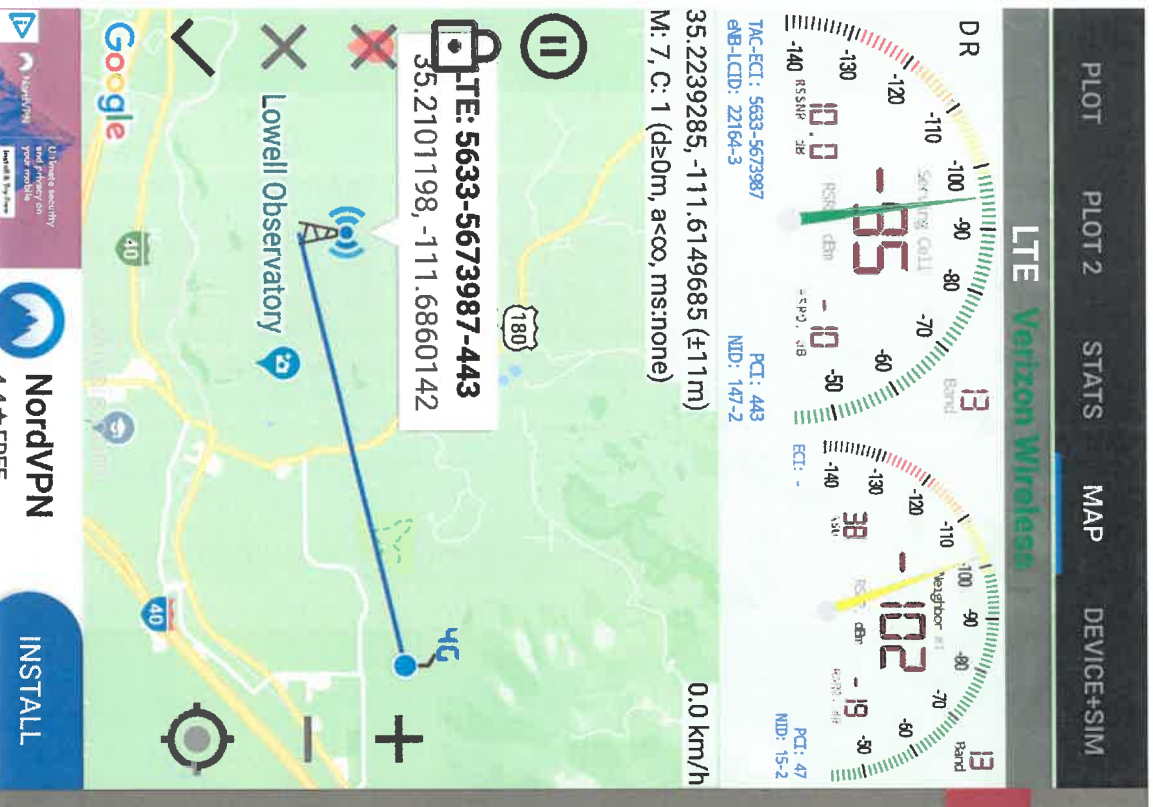


Applicant failed to provide a real need for this tower:

- ▶ Provided information is not based on empirical data that shows a significant gap in cell coverage.
- ▶ Provided data does not support the need for a new tower at the proposed location.
- ▶ Provided evidence is based entirely on google searches, free smart phone apps and fabricated project-proponent modeling.

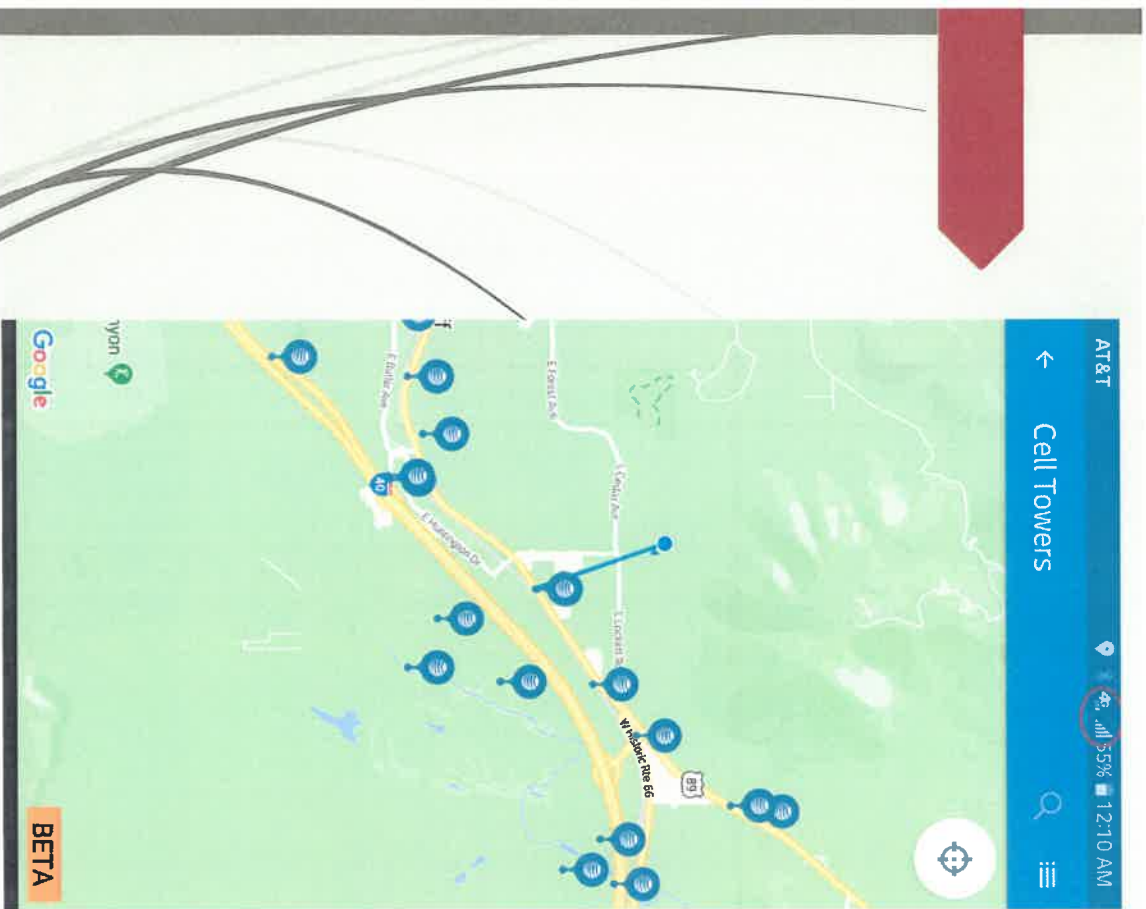
Existing Towers Providing Service to the Proposed Project Site





Free Cell Phone App!

- Same Resources Used by the Project Proponent!
- Network Cell Info Lite – Download it today from the Google Play Store!
- My neighborhood is serviced by a tower 2.5 miles away and I'm in the green!
- RF Engineers hired by the applicant say that a tower is need within .7 miles of the objective area – how can this be?



AT&T Provides Excellent Service to the Proposed Site!

- Towers Providing Service to the Proposed Site are along Route 66, far exceeding any distance limitations stated by the project proponent.
- Any claim that a site $\geq .7$ miles away from the proposed site is bogus and unsupported.
- It is common for cell towers in urban areas to be spaced a couple of miles apart.
- Limiting interference through strategic placement that offers line-of-site service is key.



Applicant did not Justify as to Why They Are Not Proposing a Preferred Site:

- ▶ Zoning Code Section F.1.C(2) A justification as to why the applicant is not proposing a preferred site, including the best efforts made to secure each of the preferred sites, why such efforts were unsuccessful, and why each of the preferred sites is not technically or legally feasible