City of El Paso – City Plan Commission Staff Report

Case No:	PZST16-00002
Application Type:	Special Permit and Detailed Site Development Plan Review
CPC Hearing Date:	March 10, 2016
Staff Planner:	Andrew Salloum, (915) 212-1613, salloumam@elpasotexas.gov
Location:	4801 Dyer Street
Legal Description:	A portion of Lots 1 & 2, Block 109, Morningside Heights, City of El Paso, El Paso County, Texas
Acreage:	0.008 acres
Rep District:	2
Zoning:	C-4 (Commercial)
Existing Use:	Motor vehicle repair, major
C/SC/SP/ZBA/LNC:	None
Request:	Special Permit to allow for a Personal Wireless Service Facility (PWSF) within a one-half mile distance to another PWSF
Proposed Use:	Ground-mounted PWSF
Property Owner:	Mohammed Farokhnia
Applicant:	Dallas MTA, LP d/b/a Verizon Wireless
Representative:	Debra Weiss, Agent, KGI Wireless

SURROUNDING ZONING AND LAND USE
North: C-4 (Commercial) / Pawn shop
South: C-4 (Commercial) / Limousine service
East: C-4/sp (Commercial/special permit) / Restaurant, Bar and Lounge
West: S-D (Special Development) / Vacated building

PLAN EL PASO DESIGNATION: G-2, Traditional Neighborhood (Walkable) (Central Planning Area)
NEAREST PARK: Pollard Park (1,498 feet)
NEAREST SCHOOL: Travis Elementary (1,284 feet)

NEIGHBORHOOD ASSOCIATIONS
Central Neighborhood Association
El Paso Central Business Association

NEIGHBORHOOD INPUT
Notice of a Public Hearing was mailed to all property owners within 300 feet of the subject property on February 24, 2016. The Planning Division has received a phone call in opposition to the special permit request.

APPLICATION DESCRIPTION
The applicant is requesting a special permit to allow for the placement of a ground-mounted personal wireless service facility (PWSF) on the proposed site within a one-half mile radius of an existing PWSF site as required by El Paso City Code Section 20.10.455F. The site plan shows a 360 sq. ft. lease area for a 68-foot high structure with antennas and service equipment enclosure. The antennas and support structure will be camouflaged to resemble a palm tree. The proposed PWSF meets all setback and height requirements for location in a commercial district. The applicant opted to request a landscape buyout as permitted by the landscaping ordinance for PWSF facilities. Two nearest PWSF are 0.35 miles to the southeast and is located on Tyler Avenue and 0.44 miles to the southwest and is located on Fillmore

Avenue. A maintenance access easement within a driveway is proposed from the alley via Truman Avenue.

PLANNING DIVISION RECOMMENDATION

The Planning Division recommends **approval** of the special permit for a Personal Wireless Service Facility (PWSF), as it meets all the requirements of 20.10.455 PWSF, 20.04.320, Special Permit, and 20.04.150, Detailed Site Development Plan.

ANALYSIS

20.10.455 Personal Wireless Service Facility (PWSF)

F. C-3, C-4 and C-5 Commercial Districts.

1. Ground-mounted PWSF antenna support structures with appurtenant equipment storage facilities are permitted with the following restrictions:

a. Setbacks. The PWSF antenna support structure shall meet the yard standards of the district, except that a setback of one foot for each foot of height, measured from the PWSF antenna support structure base to any abutting property line of property in a residential or apartment zoning district shall be required. In the case where a right-of-way or easement separates the property from a residential zoning district, the width of such right-of-way or easement shall be included in meeting the setback requirement; provided, however, that the setback from the property line shall never be less than that required in the district yard standards.

b. Separation Between PWSF Antenna Support Structures. The minimum separation distance between ground-mounted PWSF antenna support structures shall be one-half mile, except as provided in subsection (F)(1)(c). Separation distance shall be measured by drawing or following a straight line between the base of any existing PWSF antenna support structure and the proposed base of a new PWSF antenna support structure.

c. Modified Separation Between PWSF Antenna Support Structures. The minimum separation between ground-mounted PWSF antenna support structures may be reduced below one-half mile by city council upon approval of a special permit application if the city council finds that:

i. The applicant is reasonably unable to use property that is more than one-half mile from another PWSF antenna support structure and be able to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

ii. The property on which the PWSF antenna support structure is to be located is the only reasonably available property for use within one-half mile of another PWSF antenna support structure that will enable the applicant to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

iii. The area designated by the applicant cannot be reasonably served in a manner that is technically feasible and commercially reasonable by locating additional antennas on the applicant's existing PWSF antenna support structures because such existing PWSF antenna support structures cannot safely support additional antennas;

iv. The applicant is unable to collocate its antennas on an existing PWSF antenna support structure that is owned or operated by a third person or entity and located such that the applicant is able to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable; and

v. The applicant shall submit a list of addresses/locations showing all existing PWSF within a one-half mile radius of the proposed site and a map depicting such locations with the special permit application.

The applicant has submitted proof that all 5 findings have been met, (see attachment 6).

d. Height Restriction. The PWSF antenna support structure and appurtenant antennas shall not exceed one hundred twenty-five feet in height, except as provided in subsection (F)(1)(e) or (F)(1)(f).

e. Modified Height Restriction. If the applicant is collocating two or more antennas on a structure or if the structure is camouflaged, then the height for a PWSF antenna support structure and appurtenant antennas shall not exceed one hundred fifty feet.

f. Special Permit for Additional Height in C-3 and C-4 Commercial Districts Only. The height for a ground-mounted PWSF antenna support structure and appurtenant antennas may be increased by city council upon approval of a special permit application, if the city council finds that:

i. The property on which the PWSF antenna support structure is to be located is the only property reasonably available for use by the applicant for a PWSF antenna support structure of the height being proposed by the applicant that will enable the applicant to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

ii. The applicant is unable to collocate its antennas on an existing PWSF antenna support structure that is owned or operated by a third person or entity and located such that the applicant is able to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

iii. The applicant cannot use another PWSF antenna support structure that is located such that will enable the applicant to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable or that the other PWSF antenna support structures used by the applicant will not safely support additional antennas; and

iv. Due to topographical conditions, the proposed height of the PWSF antenna support structure is reasonably necessary to enable the applicant to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable.

g. Camouflage and Screening.

i. All Ground-Mounted PWSF Shall be Camouflaged. Camouflaging is a method of disguising or concealing the appearance of an object by changing its usual color, modifying its shape or locating it in a structure that complements the natural setting, existing and surrounding structures. In the context of this section, camouflaging, includes, but is not limited to, making PWSF antenna support structures resemble man-made trees, locating PWSF antenna support structures in bell steeples or clock towers, or on similar alternative-design mounting structures.

ii. Metallic Surfaces Shall be Painted to Reduce Glare and Reflections. No exterior paint colors shall be used which have a light reflecting value (LRV) greater than forty percent. The LRV of a paint is available from paint manufacturers and it measures the amount of light reflected by a certain color.

iii. Screening of antennas on PWSF antenna support structures may include the use of existing parapets, walls, or similar architectural elements provided that it is painted and texturized to integrate with the architecture of the surrounding structure.

iv. Landscaping shall comply with all code requirements for landscaping.

h. Other Requirements. The following must accompany a request for a building permit or special permit:

i. A detailed plan showing the PWSF antennas support, antennas, and equipment in relation to the existing surroundings including screening, fencing, camouflage, off-street parking, and access from the PWSF antennas support site to the nearest public street;

ii. A verification letter that all required FAA and FCC approvals have been requested and that site-specific structural engineering and nonionizing electromagnetic radiation (NIER) reports are available on request from the applicant;

iii. Satisfactory completion of a certification of compliance for personal wireless service providers issued by the public safety technology office prior to actual use of the proposed facility accompanied by a verification letter that all required Federal Aviation Administration (FAA) and Federal Communications Commission (FCC) approvals have been requested and that site-specific structural engineering and nonionizing electromagnetic radiation (NIER) reports are available on request from the applicant; and

iv. The design of related support structures for new PWSF antenna support structures shall incorporate materials, colors, textures, screening, and camouflaging techniques that will blend them to the extent reasonably possible into the natural setting and surrounding

structures. The applicant will be required to provide photographs of predevelopment views versus post-development illustrations, at ninety-degree angles for a full three hundred sixty-degree radius, shown to scale. The building official shall review and consider any of the five items above to mitigate negative visual impacts created by the proposed PWSF antenna support structure and may require reasonable revisions necessary to bring the application into compliance with one or more of the five items above.

i. A six-foot high screening fence or wall of other than chain-link shall be constructed around the base of an antenna support structure to provide for security. The gate which provides access to the antenna support shall remain locked at all times except when being used for access by maintenance personnel. Collocation or installation of additional antennas on an existing antenna support structure shall be permitted after review and approval by the building official of a structural recertification report prepared and sealed by a licensed professional engineer.

j. The access driveway and off-street parking spaces for use by maintenance vehicles shall be paved as approved by the building official.

k. Collocation or installation of additional antennas on an existing antenna support structure shall be permitted. A structural recertification report prepared and sealed by a licensed professional engineer shall be required, and such report shall be reviewed and approved by the building official prior to issuance of a building permit.

The application meets the requirements for PWSF.

20.04.320 Special permit approvals.

A. Building and occupancy permits shall not be issued to any building or use identified in this title as requiring a special permit until after approval of such special permit by the city council.

B. Building and occupancy permits shall not be issued for any building or use identified in this title as requiring an approved detailed site development plan as required by Article III, until such approval has been granted.

C. No building or occupancy permit may be granted for the erection, rehabilitation, enlargement or demolition of any building in a designated historic area or for any building that is a designated historic landmark until prior approval has been granted by the historic landmark commission.

D. The city council, after hearing and report by the city plan commission, may approve a special permit upon a finding that the proposed development meets the following minimum requirements necessary to protect the public health, safety and general welfare of the community:

1. The proposed development complies, except to the extent waived, varied or modified pursuant to the provisions of this title, with all of the standards and conditions applicable in the zoning district in which it is proposed to be located; complies with any special standards applicable to the particular type of development being proposed, or to the particular area in which the development is proposed; complies with any special approvals required in connection with such development or area;
2. The proposed development is in accordance with and in furtherance of the plan for El Paso, any special neighborhood plans or policies adopted by the city regarding the development area, or any approved concept plan;
3. The proposed development is adequately served by and will not impose an undue burden upon the public improvements and rights-of-way by which it will be served or benefited, or which exist or are planned for installation within its boundaries or their immediate vicinity. A traffic impact study may be required to determine the effects of the proposed development on the public rights-of-way;
4. Any impacts of the proposed development on adjacent property are adequately mitigated with the design, proposed construction and phasing of the site development;
5. The design of the proposed development mitigates substantial environmental problems;
6. The proposed development provides adequate landscaping and/or screening where needed to reduce visibility to adjacent uses;
7. The proposed development is compatible with adjacent structures and uses;

8. The proposed development is not materially detrimental to the enjoyment or valuation of the property adjacent to the site.

E. The applicant may request that the city plan commission waive one or more of the criteria based on its no applicability to the proposed development. The city plan commission, upon a recommendation of the planning official, shall make a determination on the no applicability of the criteria and shall render a finding based on such determination, and shall forward their recommendation to city council for final review and approval.

The application meets the requirements for special permit.

20.04.140 When required.

Except as stated herein, a detailed site development plan is required prior to development in a special purpose district or with a special permit application and may be required if a zoning condition exists on a particular piece of property. Detailed site development plans are not required for any projects for development in the Mixed Use District (RMU, GMU and IMU) or for any other projects other than those located in special purpose districts or as otherwise required herein.

Detailed Site Development Plan review is required as part of the special permit application.

20.04.150 Procedure.

D. City plan commission approval. Pursuant to this Code, the city plan commission, in addition to the powers and duties identified in this chapter, shall have final authority on approval of all other detailed site development plans, unless a zoning condition, contract provision, other city code provision or state law require the detailed site development plan to be approved by city council.

1. The planning division shall make its recommendations to the city plan commission within thirty days after a complete application is submitted.
2. The city plan commission shall hold a public hearing at its regular meeting that is within thirty days from receipt of department recommendations.
3. The commission shall consider the following information when approving a proposed detailed site development plan: the boundaries of the tract proposed for development; location and arrangement of structures; determine if the use conforms to applicable zoning regulations, determine if historic landmark commission approval has been granted for architectural design of all structures if located in a historic district and the design conforms to such approval; location of utility rights-of-way and easements and storm water drainage; vehicular and pedestrian ways; on-site parking areas; location of open spaces and landscape planted areas.
4. In no instance shall the city plan commission have authority to vary the yard standards applicable to the district.
5. The city plan commission shall approve the plan if it complies with all applicable code provisions.

Planning Staff has reviewed the detailed site development plan, and verified that it meets all requirements of Sections 20.04.320, Special Permit, and 20.04.150 Detailed Site Development Plan.

Plan El Paso-Future Land Use Map Designation

All applications for special permit shall demonstrate compliance with the following criteria:

G-2 – Traditional Neighborhood (Walkable): This sector includes the remainder of central El Paso as it existed through World War II. Blocks are small and usually have rear alleys; buildings directly faced streets; schools, parks, and small shops are integrated with residential areas. This sector is well-suited for use of the SmartCode as a replacement for current zoning when planned in conjunction with specific neighborhood plans or identified in this Comprehensive Plan.

The purpose of the C-4 (Commercial) district is to provide for locations for the most intensive commercial uses intended to serve the entire city. It is intended that the district regulations permit heavy commercial uses

characterized by automotive and light warehousing. The regulations of the districts are intended to provide a transition from general business areas to industrial and manufacturing uses, and to accommodate major locations of commerce, service and employment activities. Within the central business district, more intensive commercial uses are allowed, the predominant of which are retail trade and service uses, providing less restrictive height and area regulations.

COMMENTS:

Planning and Inspections Department – Planning Division - Transportation
No objections to the special permit request.

Note:
All existing / proposed paths of travel (accessible sidewalks, wheelchair access curb ramps and driveways) within public rights-of-way shall be in compliance with current ADA/TAS rules and regulations and the current City of El Paso Design Standards for Construction.

Planning and Inspections Department – Plan Review
No objections to proposed special permit.

Note:
At the time of submittal for building permits the project will need to comply with all applicable provisions of the IRC and local municipal code.

Planning and Inspections Department - Landscaping Division
No objection to proposed special permit per submitted landscape buyout letter.

Planning and Inspections Department - Land Development
1. No further objections.

2. Approval of the site plans by CPC constitutes a determination that the applicant is in compliance with the minimum provisions. Applicant is responsible for the adequacy of such plans, insuring that stormwater is in compliance with ordinances, codes, DSC, and DDM. Failure to comply may require the applicant to seek re-approval of the site plans from CPC.

Fire Department
EPFD has no objections.

Sun Metro
Sun Metro does not oppose this request. Sun Metro does have an existing bus stop serviced by Routes 32 & 35 immediately adjacent to 4831 Dyer. If there is any work to be done along Dyer that may impact this bus stop, coordination is recommended with Sun Metro Operations.

El Paso Water Utilities
EPWU does not object to this request.
Water:
There is an existing 6-inch diameter water main extending along the east side of the alley, west of Dyer Street between Truman Avenue and Lincoln Street, approximately 6-feet west of and parallel to the eastern right-of-way of the alley. This water main is available for service.
EPWU records indicate a killed water service at the subject property.
Sanitary Sewer:
There is an existing 8-inch diameter sanitary sewer main extending along the west side of Dyer Street, approximately 21-feet east of and parallel to the western right-of-way of Dyer Street. This sanitary sewer main is available for service.

There is an existing 8-inch diameter sanitary sewer main extending along the south side of Truman Avenue, approximately 25-feet north of and parallel to the southern right-of-way of Truman Avenue. This sanitary sewer main is available for service.

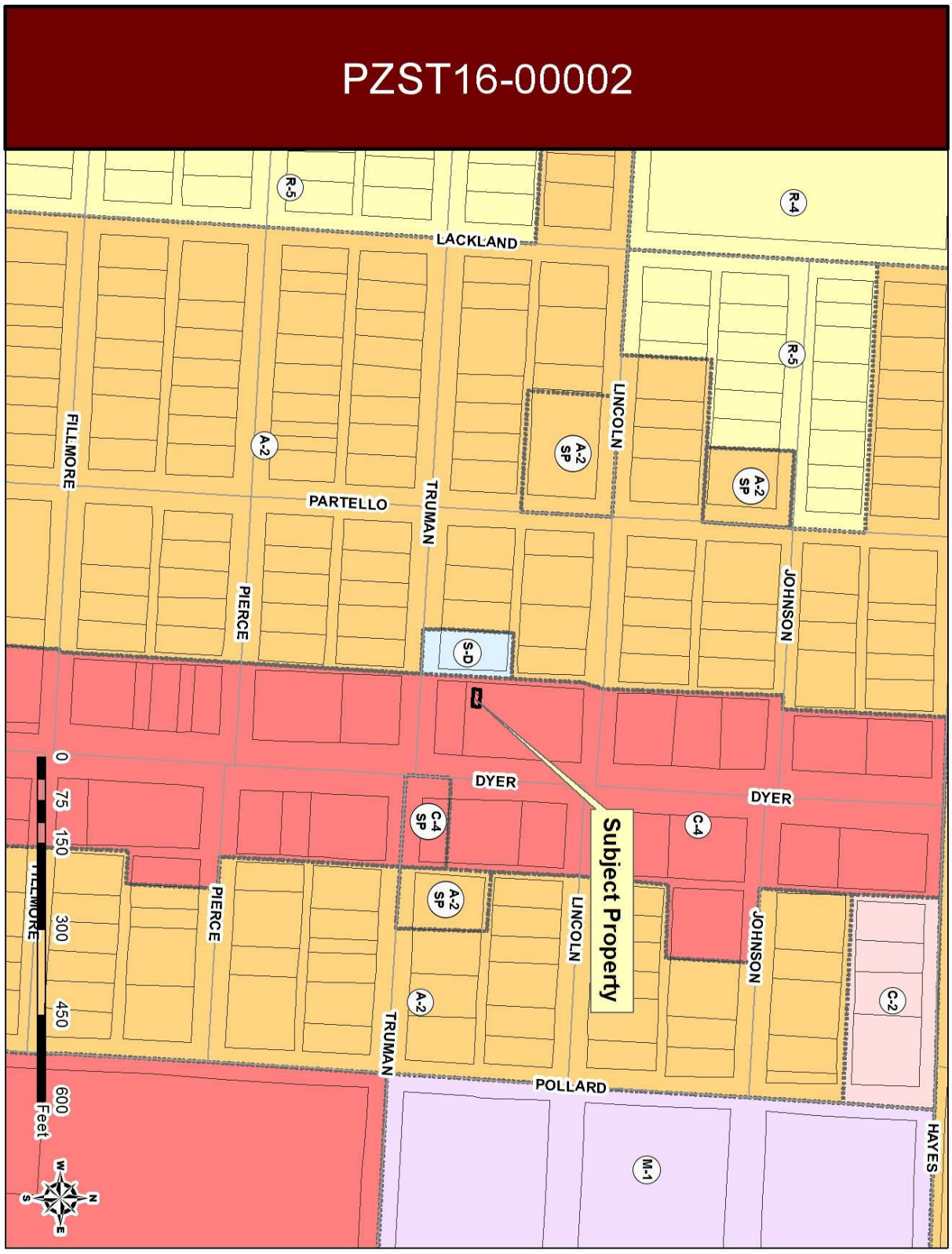
General:

EPWU requires a new service application to provide service to the property. New service applications are available at 1154 Hawkins, 3rd floor and should be made 6 to 8 weeks in advance of construction to ensure water for construction work. A site plan, utility plan, grading and drainage plans, landscaping plan, the legal description of the property and a certificate-of-compliance are required at the time of application. Service will be provided in accordance with the current EPWU – PSB Rules and Regulations. The applicant is responsible for the costs of any necessary on-site and off-site extensions, relocations or adjustments of water and sanitary sewer lines and appurtenances.

Attachments

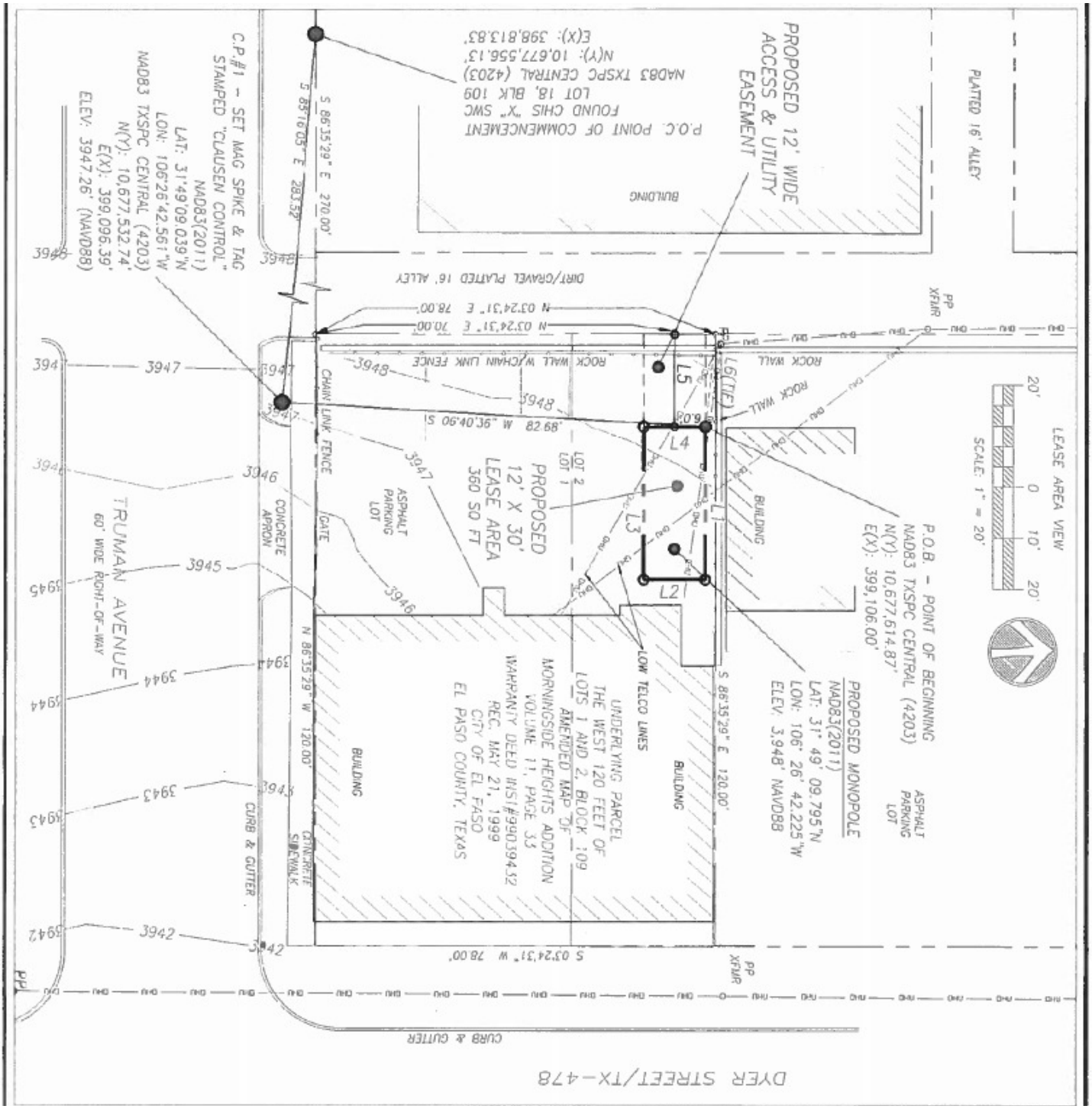
1. Zoning Map
2. Aerial Map
3. Detailed Site Development Plan
4. Simulation Pictures
5. Landscape Buyout Request
6. Findings Analysis

ATTACHMENT 1: ZONING MAP

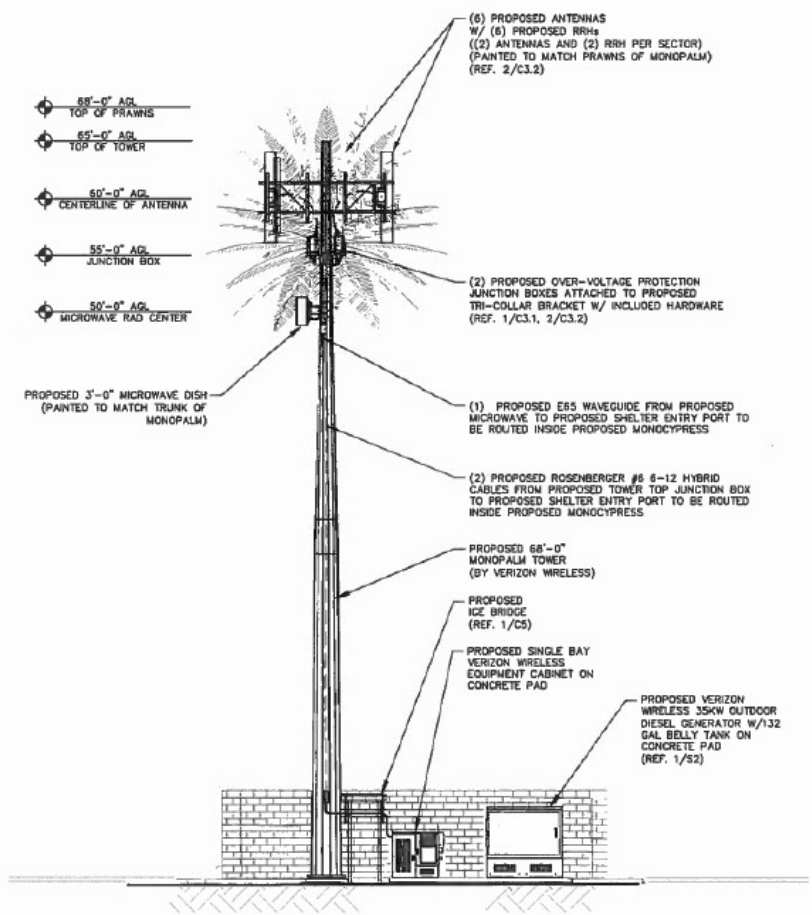


ATTACHMENT 2: AERIAL MAP

ATTACHMENT 3: DETAILED SITE DEVELOPMENT PLAN



DETAILED SITE PLAN
SCALE: 1" = 5'
PROPOSED 12'-0" SITE ACCESS/ UTILITY EASEMENT (REF. 3/C4)
DEMO STONE WALL TO GRADE OF ALLEY AT PROPOSED 12'-0" SITE ACCESS GATE
PROPOSED CONCRETE STEPS FROM ALLEY TO GRADE OF EXISTING ASPHALT PARKING LOT
PROPOSED 12'-0" SITE ACCESS GATE (REF. 1/C6)
PROPOSED 8'-0" HIGH MASONRY WALL
PROPOSED VERIZON WIRELESS DIESEL GENERATOR ON CONCRETE PAD (REF. C/3, REF. 1/S2)
PROPOSED VERIZON WIRELESS EQUIPMENT CABINETS ON CONCRETE PAD (REF. C/A REF. 1/S2)
EXISTING OVERHEAD UTILITY LINES TO BE RELOCATED BY OTHERS
PROPOSED TOWER (BY VERIZON WIRELESS) (REF. 1/C1)
PROPOSED ICE BRIDGE (REF. 2/C3)
PROPOSED 12'-0"x30'-0" VERIZON WIRELESS LEASE AREA
(1) PROPOSED E65 WAVEGUIDE FROM PROPOSED MICROWAVE TO PROPOSED SHELTER ENTRY PORT TO BE ROUTED INSIDE MONOCYPRESS TOWER
(2) PROPOSED ROSENBERGER #6 6-12 HYBRID CABLE FROM PROPOSED TELCO BOX TO PROPOSED SHELTER ENTRY PORT TO BE ROUTED INSIDE PROPOSED MONOCYPRESS TOWER
EXISTING POWER POLE
EXISTING OVERHEAD TELCO LINES
EXISTING CHAIN LINK FENCE
EXISTING ASPHALT PARKING LOT
EXISTING BUILDING
NOTE:
UNDERGROUND UTILITIES ARE NOT SHOWN. CONTRACTOR SHALL HAVE LOCATION SERVICE LOCATE AND MARK ALL UNDERGROUND UTILITIES PRIOR TO CONSTRUCTION.
N



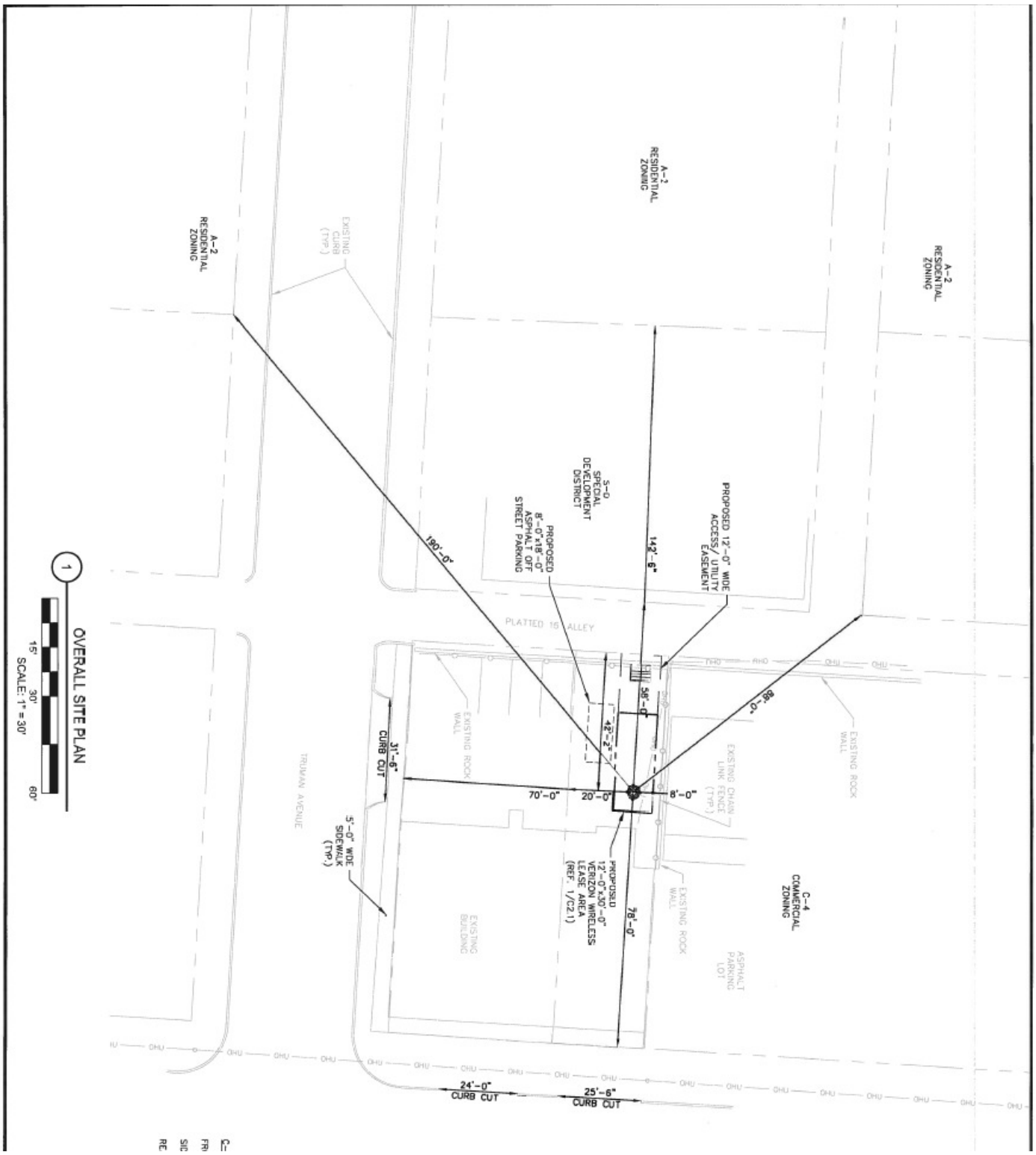
1 TOWER ELEVATION
SCALE: N.T.S.

NOTES:

1. FOR DETAILED TOWER INFOR
ERECTION DRAWINGS BY OTH
IS INTENDED TO ONLY GENE

2. ANALYSIS AND DESIGN OF T
OTHERS. NO MODIFICATIONS
WITHOUT APPROVAL OF STRU

3. A STRUCTURAL TOWER ANAL
A LICENSED ENGINEER TO VE
TOWER PRIOR TO THE INSTA
ANTENNAS AND APPURTENA

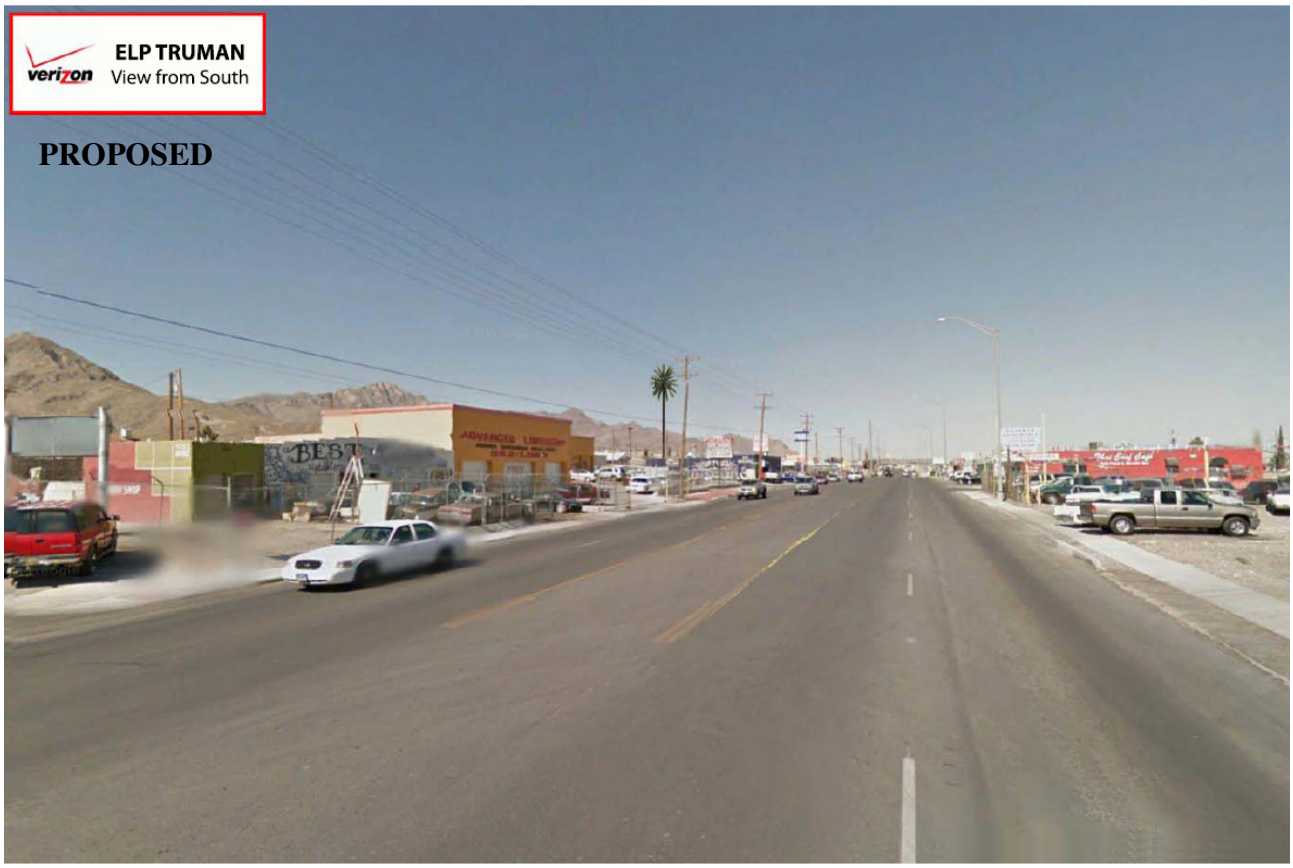

A-2
RESIDENTIAL
ZONING
EXISTING
CURB
(TYP.)
S-D
SPECIAL
DEVELOPMENT
DISTRICT
PROPOSED
8'-0"x18'-0"
ASPHALT OFF
STREET PARKING
PROPOSED 12'-0" WIDE
ACCESS/ UTILITY
EASEMENT
190'-0"
142'-6"
PLATTED 15' ALLEY
58'-0"
42'-2"
85'-0"
70'-0"
20'-0"
8'-0"
31'-6"
CURB CUT
EXISTING ROCK
WALL
EXISTING CHAIN
LINK FENCE
(TYP.)
TRUMAN AVENUE
5'-0" WIDE
SIDEWALK
(TYP.)
PROPOSED
12'-0"x30'-0"
VERIZON WIRELESS
LEASE AREA
(REF. 1/C2.1)
78'-0"
EXISTING
BUILDING
ASPHALT
PARKING
LOT
C-4
COMMERCIAL
ZONING
24'-0"
CURB CUT
25'-6"
CURB CUT
OHU
THD
RHD
1
OVERALL SITE PLAN
SCALE: 1" = 30'
15'
30'
60'

ATTACHMENT 4: SIMULATION PICTURES

ELP TRUMAN
View from East
EXISTING
DIRTY CUSTOMS

ELP TRUMAN
View from East
PROPOSED
DIRTY CUSTOMS

ELP TRUMAN
View from South
EXISTING


ELP TRUMAN
View from South
PROPOSED

ELP TRUMAN
View from West
EXISTING

ELP TRUMAN
View from West
PROPOSED

ATTACHMENT 5: LANDSCAPE BUYOUT REQUEST

February 9th, 2016

Jeff Howell, Senior Planner
City of El Paso Planning & Inspections
801 Texas Avenue
El Paso, TX 79901

RE: Request for Special Permit Approval
Verizon Wireless / Site ID: ELP_Truman
PID# 360648
Legal Description: 109 MORNINGSIDE HEIGHTS W120 FT OF 1 & 2 (9,360 SQ FT)
El Paso County, Texas

Dear Mr. Howell,

Verizon has chosen the one time buy out fee of $5,000.00 for unmanned facilities under Chapter 18.46.140 for said property listed above. The one time buy out fee is in lieu of the requirement to provide 15% landscaping coverage with associated watering system on the leased portion of the subject parcel.

Verizon understands that said payment of $5,000.00 must be provided at the same time the BP Application and the associate fees for said application are submitted to the City of El Paso.

Sincerely,

John Tyke
Real Estate Specialist
Verizon Southwest Region
Mobile (480) 220-3298
John.Tyke2@VerizonWireless.com

20.10.455 - Personal wireless service facilities.

F. C-3, C-4 and C-5 Commercial Districts.

1. Ground-mounted PWSF antenna support structures with appurtenant equipment storage facilities are permitted with the following restrictions:

c. Modified Separation Between PWSF Antenna Support Structures. The minimum separation between ground-mounted PWSF antenna support structures may be reduced below one-half mile by city council upon approval of a special permit application if the city council finds that:

i) The applicant is reasonably unable to use property that is more than one-half mile from another PWSF antenna support structure and be able to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

Response: Verizon Wireless looked at the existing 75' monopole structure/tower owned by SBA, approximately .35 miles Southeast at 4062 Tyler Avenue. Its current elevation base is at 3,924'. Verizon would need to co-locate at 55'. The total height (CL) for this location would be 3,979, which is too low to meet Verizon's requirement.

In addition, the current SBA location is too close to an existing Verizon site ELP_ FORT BLVD (.3 miles South) and would cause interference.

Verizon Wireless looked at the existing 75' monopole structure/tower owned by Crown Castle, approximately .44 miles Southwest at 3500 Fillmore. Its current elevation Base is at 4,041. Verizon would need to co-locate at 55'. The total height (CL) for this location would be 4,096, which is too high to meet Verizon's requirement.

In addition, the current Crown Castle location is too close to an existing Verizon site ELP_NEWMAN PARK (.8 miles East) and would cause interference. Furthermore, the Crown Castle site is located in an area with minimal traffic, and will not offload

any capacity through the area of need.

The proposed 68' Stealth Monopalm located at 4801 Dyer Street, has an elevation base of 3,948,

with the CL at 60', which would give Verizon 4,008'. This location is a CAPACITY SITE will allow

Verizon to serve high volume users located around Fort Bliss Housing and base communications.

as well as the Fort Bliss Housing to the North.

ii) The property on which the PWSF antenna support structure is to be located is the only reasonably available property for use within one-half mile of another PWSF antenna support structure that will enable the applicant to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable;

Response: Verizon's RF engineers investigated all options within this 1/2mile area and found the site at 4801 Dyer Street the best in terms of it being technically feasible and with a commercially feasible lease.

iii) The area designated by the applicant cannot be reasonably served in a manner that is technically feasible and commercially reasonable by locating additional antennas on the applicant's existing PWSF antenna support structures because such existing PWSF antenna support structures cannot safely support additional antennas;

Response: Colocation at the existing SBA location on Tyler Avenue or the Crown Castle

Located on Fillmore will not allow Verizon's antennas to provide the necessary capacity coverage needed to its customers in the area.

iv) The applicant is unable to collocate its antennas on an existing PWSF antenna support structure that is owned or operated by a third person or entity and located such that the applicant is able to reasonably serve the area designated in a manner that is technically feasible and commercially reasonable; and

Response: Colocation at the existing SBA location on Tyler Avenue or the Crown Castle
Located on Fillmore will not allow Verizon's antennas to provide the necessary capacity coverage needed to its customers in the area.

v) The applicant shall submit a list of addresses/locations showing all existing PWSF within a one-half mile radius of the proposed site and a map depicting such locations with the special permit application.

Response: The attached map Exhibit A, ELP_Truman Existing Towers, shows the existing SBA and Crown Castle sites and the proposed 68' Stealth Monopalm site needed by Verizon in order to provide CAPACITY coverage to the FORT BLISS Housing and Base community and the local commuting traffic.

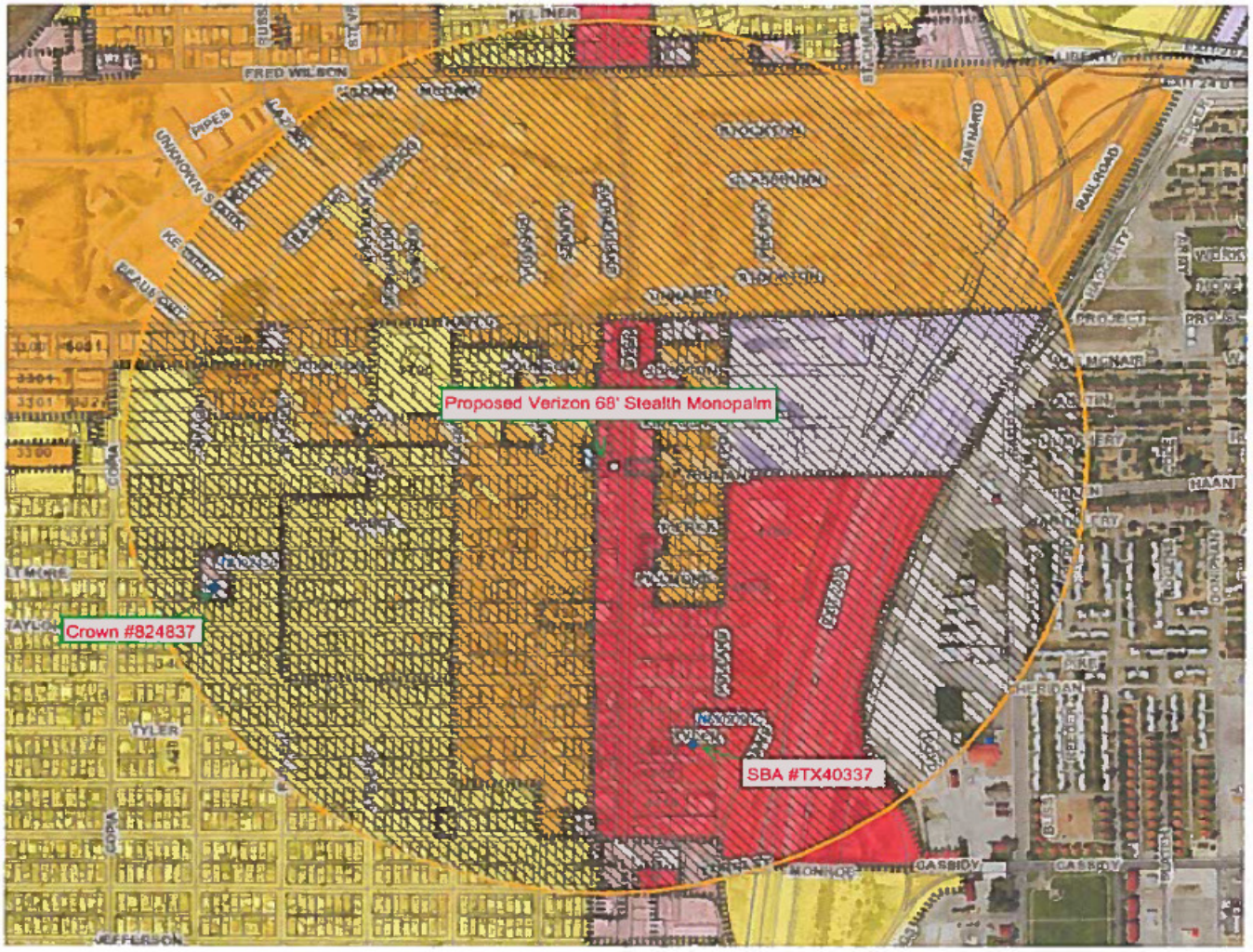
Sincerely,

Hamdi K Alaaldin
Verizon Wireless
RF Engineer
480-752-7245

"EXHIBIT A"

Verizon ELP_Truman

Existing Towers within ½ Mile Radius

#1 – SBA Site ID# TX40337 **.35 Miles SE *(NM02090C)* ** 4062 Tyler Ave

#2 – Crown Site ID# 824837 ** .44 Miles SW *(NM02436A)* ** 3500 Fillmore