



City of El Paso – City Plan Commission Staff Report

Case No: PZST16-00009
Application Type: Special Permit
CPC Hearing Date: June 16, 2016
Staff Planner: Jeff Howell, 915-212-1607, howelljb@elpasotexas.gov
Location: 1020 Belvidere Street
Legal Description: Portion of Lot 1, Block 67A, Chaparral Park Unit 22, City of El Paso, El Paso County, Texas
Acreage: 0.002-acre
Rep District: 1
Existing Zoning: C-1 (Commercial)
Existing Use: Parking Lot
C/SC/SP/ZBA/LNC: N/A
Request: Special Permit to allow a Personal Wireless Service Facility (PWSF)
Proposed Use: Ground-mounted PWSF
Property Owner: Raimundo Portilla F. & Jose Manuel Portilla F.
Applicant: Verizon Wireless c/o Black & Veatch Corp.
Representative: Kevin Provance, Black & Veatch Corp., Agent for Verizon Wireless

SURROUNDING ZONING AND LAND USE

North: C-1 (Commercial) / Commercial shopping center
South: R-4 (Residential) / Duplexes
East: C-1 (Commercial) / Office
West: C-1 (Commercial) / Gas station

PLAN EL PASO DESIGNATION: G-4, Suburban (Walkable) (Northwest Planning Area)

NEAREST PARK: Park Hills Park (6,721 feet)

NEAREST SCHOOL: Polk Elementary School (683 feet)

NEIGHBORHOOD ASSOCIATIONS

Upper Valley Improvement Association
Upper Mesa Hill Neighborhood Association

NEIGHBORHOOD INPUT

Notice of a Public Hearing was mailed to all property owners within 300 feet of the subject property on May 31, 2016. The Planning Division has not received any communication in support or 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 20.10.455.E. The site plan shows a 100 sq. ft. lease area for a 50-foot high structure with antennas and service equipment enclosure. The antennas and support structure will be camouflaged to resemble a light pole within an existing parking lot, while the equipment will be screened with a rockwall at the edge of the property. 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. The nearest PWSF is 0.48 miles to the northeast and is located on Loma de Cristo Drive. A maintenance access easement within a drive aisle is proposed from Belvidere Drive.

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)

E. C-1, C-2 and P-C Commercial Districts, S-D Special Development.

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

a. Setbacks.

i. A setback of three feet 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 or apartment district, the width of such right-of-way or easement shall be included in meeting the setback requirement; provided, however, the setback from any abutting property line of property in a residential or apartment district shall never be less than one foot for each foot of height, measured from the PSWF antenna support structure base.

ii. When the property in which the PWSF is located abuts a parcel of land that is not in a residential or apartment zoning district, a setback of one foot for each foot of height, measured from the PWSF antenna support structure base to that property line, shall be required.

b. Modified Setbacks. The setback set forth in subsection (E)(1)(a)(i) may be reduced, but not below the following: one foot setback for each foot of height if the structure height is fifty feet or less; and two feet setback for each foot of height if the structure height is greater than fifty feet but no greater than seventy-five feet; if the city council, based on written evidence provided by the applicant, 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 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 used 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

iii. The applicant cannot use another PWSF antenna support structure that is located such that the applicant is able to reasonable 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.

c. 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 (E)(1)(d). 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.

d. 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 based on findings 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).

e. Height Restriction. Ground-mounted PWSF antenna support structures shall not exceed seventy-five feet in height, except as provided in subsection (E)(1)(f).

f. 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 shall not exceed one hundred feet.

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:

i. A detailed plan showing the PWSF antenna support structure, antennas and equipment in relation to the 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 upon request;

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, or camouflaging techniques that will blend them to the extent reasonably possible into the natural setting, existing 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 a PWSF antenna support structure to provide for security. The gate which provides access to the PWSF antenna support structure shall remain locked at all times except when being used for access by maintenance personnel.

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

k. Increase in Elevation on Existing PWSF Antenna Support Structure. Increase in elevation, not to exceed one hundred feet, of an existing permitted PWSF antenna support structure shall be permitted only to allow for collocation of additional antennas. 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-4 – Suburban (Walkable): This sector applies to modern single use residential subdivisions and office parks, large schools and parks, and suburban shopping centers. This sector is generally stable but would benefit from strategic suburban retrofits to supplement the limited housing stock and add missing civic and commercial uses.

The purpose of the C-1 (Commercial) district is to provide compatible neighborhood convenience goods and services that serve day-to-day needs. It also is to permit locations for business and professional offices and retail category uses within adjacent residential areas of medium and high densities.

COMMENTS:

Planning and Inspections Department – Planning Division - Transportation

No objections to the special permit request.

Planning and Inspections Department – Plan Review

No objections to proposed special permit.

At the time of submittal for building permits the project will need to comply with all applicable provisions of the IBC, Municipal Code, and TAS.

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 objections to proposed special permit for PWSF.
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.

Texas Department of Transportation

No permit is necessary since no work is proposed on TxDOT right of way.

Fire Department

EPFD has no objections.

Sun Metro

Sun Metro does not oppose this request.

El Paso Water Utilities

1. EPWU does not object to this request.

Water:

2. There is an existing 12-inch diameter water main extending along Belvidere Street located approximately 30-feet south from the northern right-of-way-line. This water main is available for service.
3. Previous water pressure readings from fire hydrant # 5110 located at 6615 Belvidere Street and 370' E, N-Side of Westwind, have yielded a static pressure of 132 (psi), a residual pressure of 118 (psi), and a discharge of 1,186 gallons per minute.
4. The owner should, for his own protection and at his own expense, install at the discharge side of each water meter a pressure regulator, strainer and relief valve, to be set for pressure as desired by the customer. The Lot owner shall be responsible for the operation and maintenance of the above-described water pressure regulating device.

Sanitary Sewer:

5. There is an existing 8-inch diameter sanitary sewer main extending along Belvidere Street located approximately 40' from the northern property line. This sanitary sewer main is available for service.

General:

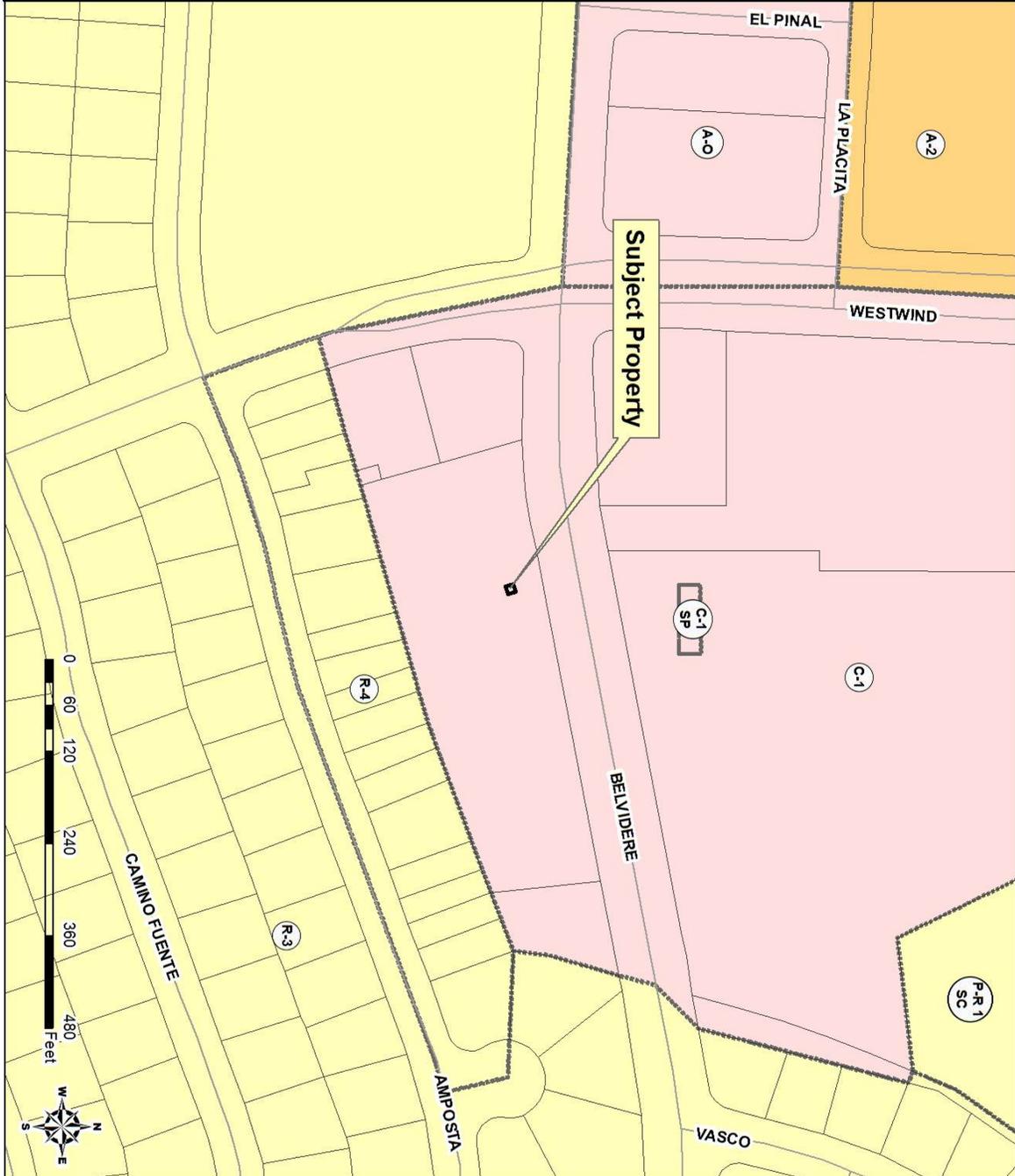
6. EPWU requires a new service application to provide service to the property. New service applications are available at 1154 Hawkins, 3rd floor and should be made 6 to 8 weeks in advance of construction to ensure water for construction work. A site plan, utility plan, grading and drainage plans, landscaping 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

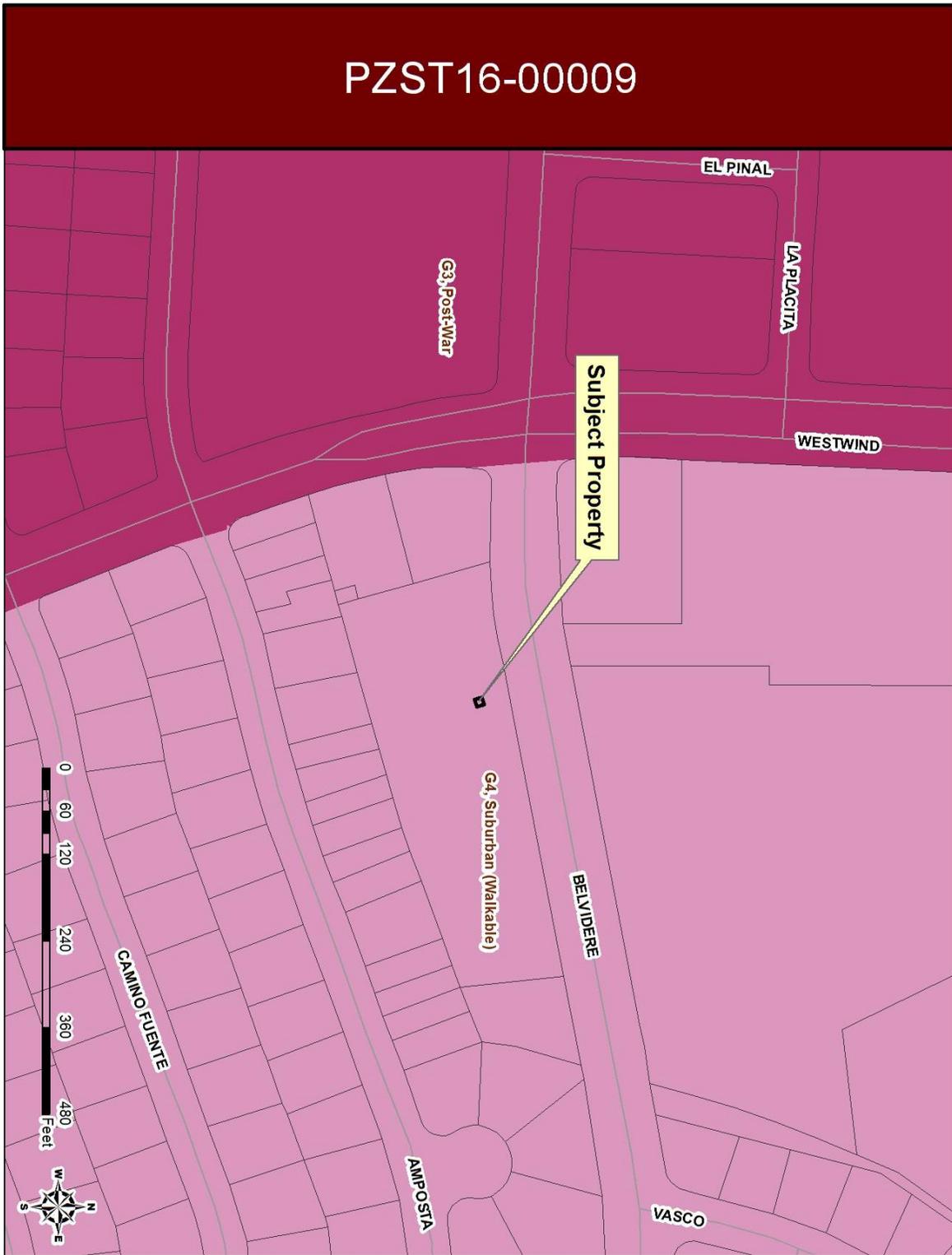
1. Zoning Map
2. Future Land Use Map
3. Aerial Map
4. Detailed Site Development Plan
5. Simulation Pictures
6. Landscape Buyout Request
7. Findings Analysis-Separation
8. Coverage Map

ATTACHMENT 1: ZONING MAP

PZST16-00009



ATTACHMENT 2: FUTURE LAND USE MAP

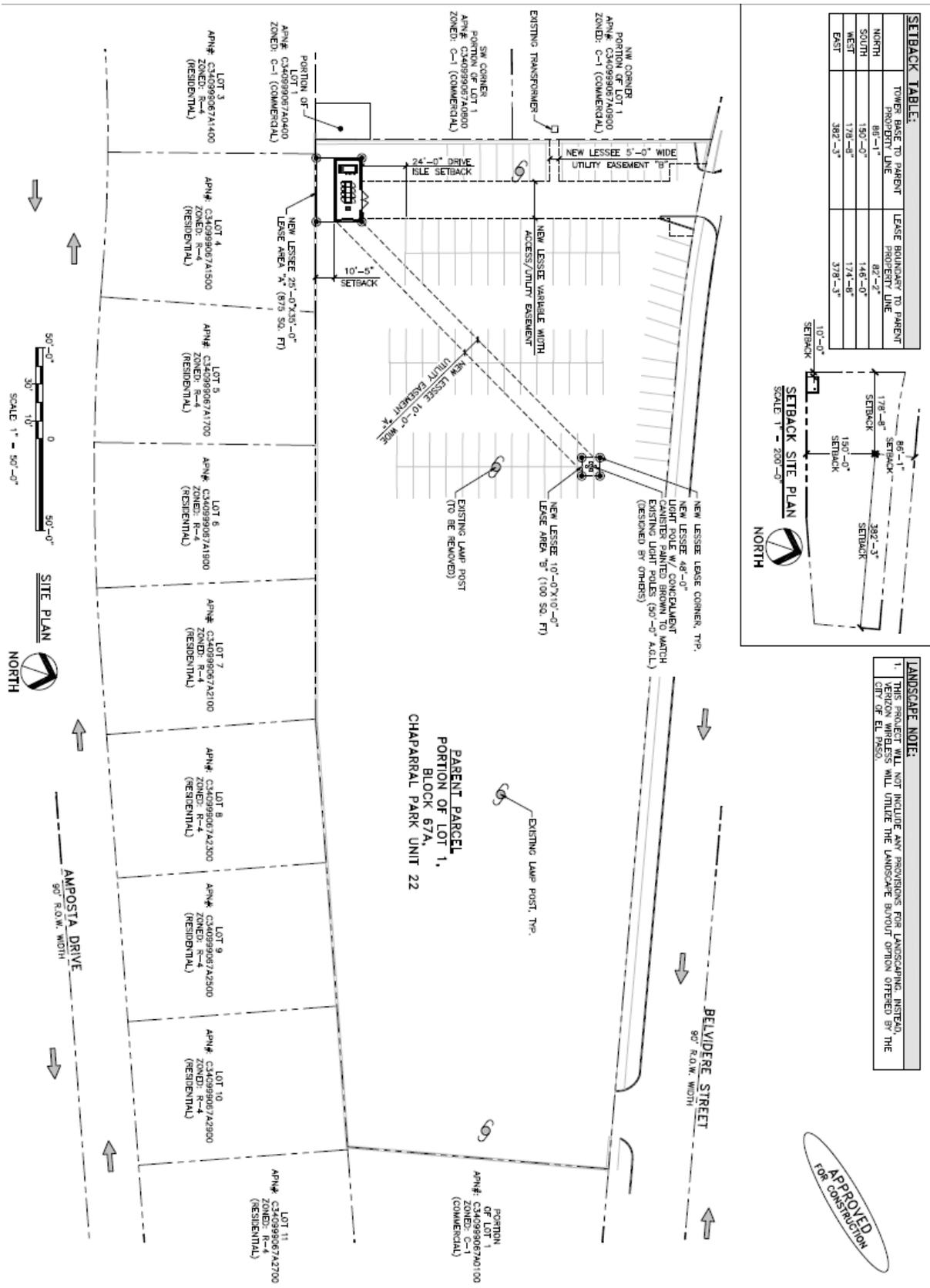


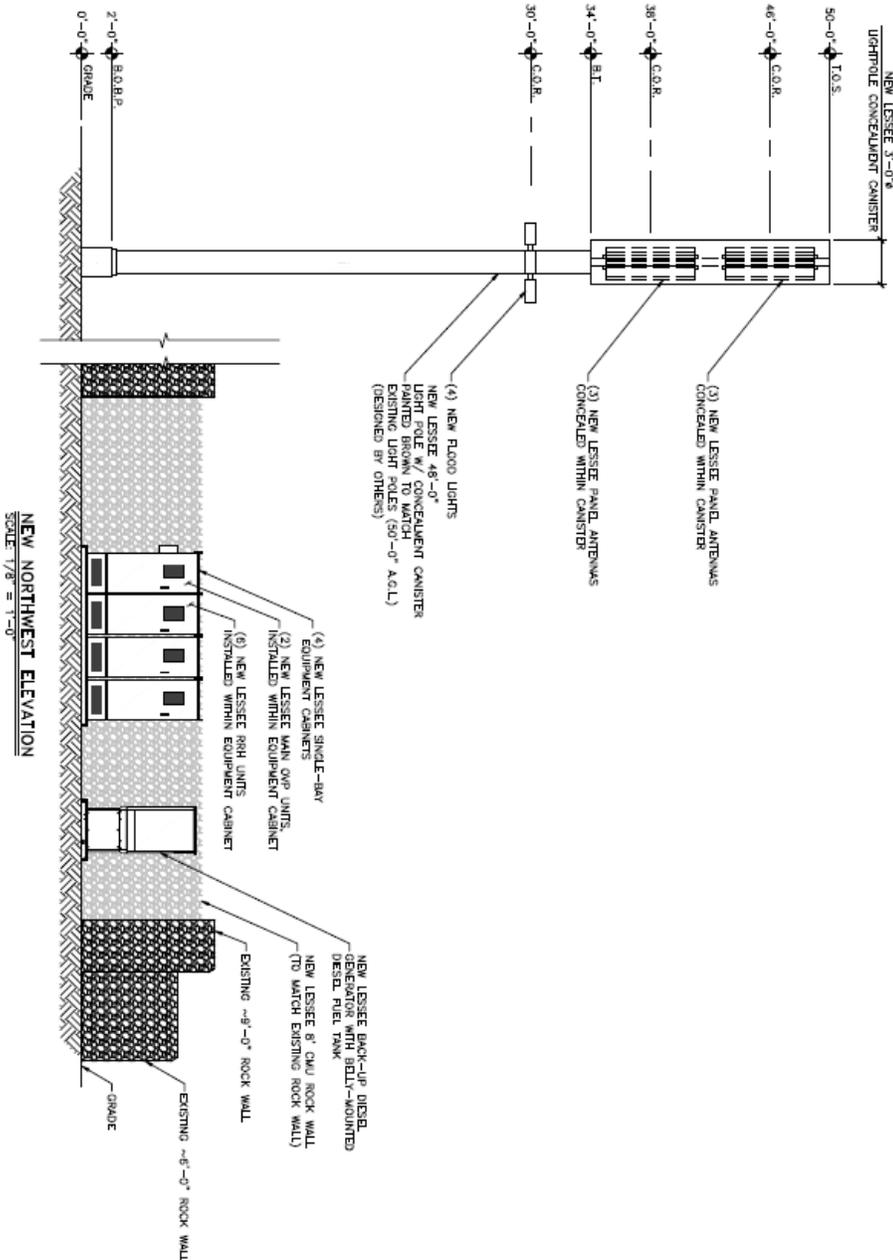
ATTACHMENT 3: AERIAL MAP

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ATTACHMENT 4: DETAILED SITE DEVELOPMENT PLAN





GENERAL NOTES:

1. NEW LESSEE 8' CWJ ROCK WALL IS TO MATCH SAME STYLE MATERIAL AND TEXTURE OF EXISTING ROCK WALL
2. NEW LESSEE FLOOD LIGHTS IS TO BE DARK-SKY COMPLIANT PER SECTION 18.18

KEY:

C.O.R. =	CENTER OF ROTATION
A.L. =	ATTACHMENT LEVEL
B.T. =	BOTTOM TIP LEVEL
T.T. =	TOP TIP LEVEL
A.G.L. =	ABOVE GRADE LEVEL
B.O.B.P. =	BOTTOM OF SAE PLATE
T.O.S. =	TOP OF STRUCTURE



ATTACHMENT 5: SIMULATION PICTURES



EXISTING



PROPOSED

PZST16-00009

BEFORE



EXISTING

AFTER



PROPOSED



EXISTING



PROPOSED

ATTACHMENT 6: LANDSCAPE BUYOUT REQUEST

Verizon Wireless ELP Amposta

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 proposed PWSF facility will conform to all other applicable City of El Paso regulations. However, VZW is requesting a modification to the setback requirement pursuant to Section §20.10.455(E)(1)(b). Due to the fact that VZW is proposing a 50' Light Standard, VZW would like the setback to the south property line modified to a one foot setback for each foot of height of the proposed 50' structure that abuts a residential district. In addition, VZW is requesting a modification to the ½ mile separation distance between PWSF antenna structures, thus requiring a Special Use Permit. The closest tower to this proposed location is 0.48 miles and is owned by Crown Castle International. VZW acknowledges that it is subject to approval by both the City Plan Commission and City Council for this separation distance modification.

In addition, pursuant to Ordinance Chapter 18.46.080, titled "Required landscapable areas," Sub-section A., of the City of El Paso, Texas, Zoning Ordinance, Verizon Wireless' is requesting a waiver from the required landscape requirements. Due to the commercial nature of the property and its use as a parking lot that is partially surrounded by a rock wall, the proposed PWSF will blend in with the existing surroundings.

Further, all other setbacks will be complied with and no streets, rights-of-way or easements will be encroached upon. After construction, this site will provide 911 and emergency communication as well as improved wireless service in this section of the City of El Paso.

Statement of Operations

Once the construction of the wireless telecommunications facility is complete and the telephone switching equipment is fine-tuned, visitation to the site by service personnel for routine maintenance will occur approximately once a month. The site is entirely self-monitored and connects directly to a central office where sophisticated computers alert personnel to any equipment malfunction or breach of security. The wireless telecommunications facility will be unstaffed, with no regular hours of operation and no impact to existing traffic patterns.

Compliance with Federal Regulations

Verizon Wireless will comply with all applicable FCC rules governing construction requirements, technical standards, interference protection, power and height limitations, and radio frequency standards. In addition, the company will comply with all applicable FAA rules on site location and operation.

ATTACHMENT 7: FINDINGS ANALYSIS-SEPARATION

Verizon Wireless ELP Amposta

- c. 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 (E)(1)(d). 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.

Refer to Tower Location map and tower spreadsheet list Exhibit for the existing PWSFs located within a one-half (1/2) mile from VZW's proposed stealth PWSF. Only one (1) existing PWSF exists less than one-half (1/2) mile from the proposed stealth PWSF. That is Crown Castle I.D. #822420 which is 0.48 miles away from VZW's proposed site location. VZW is requesting a waiver from the separation distance requirement due to technology and topographic constraints, specifically providing for improved wireless coverage and increased voice and data capacity to the immediate area. The rationale for this is explained in Exhibit H, VZW's Radio Frequency Engineer's statement.

- d. 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 based on findings 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;

VZW is unable to utilize the adjacent Crown Castle and American Tower existing towers as shown the Location Map of existing wireless carriers. These existing towers are located too far away from this specific geographic area to provide additional capacity for VZW's existing ELP Resler and ELP Loma sites.

- 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;

VZW looked at a possible collocation upgrade with the Crown Castle site located 0.48 miles from this proposed PWSF for the possibility of a collocation upgrade. Collocating on Crown's Castle's tower would not provide the necessary off-loading of capacity traffic and coverage for the existing ELP Resler and ELP Loma sites and also would not help to eliminate the coverage gap in this area since there are no existing VZW sites in this geographic area. Furthermore, the existing Crown Castle site is an existing stealth light pole standard and would have to be deconstructed and reconstructed to handle the additional antenna loading VZW requires. This would potentially impact the visual designs of these parking lot light poles if modified to accommodate VZW antenna loading.

(Refer to Exhibit I, VZW's Radio Frequency Engineer's map for adjacent VZW sites in the vicinity.)

- 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;

This proposed PWSF is designed to provide extra capacity within the VZW wireless network for the existing ELP Resler and ELP Loma sites. Refer to Exhibit H, VZW's Radio Frequency Engineer's map for adjacent VZW sites in the vicinity. Installing additional antennas at the ELP Resler and ELP Loma site will not adequately increase the capacity and coverage service in the immediate 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

The relative location of this property makes it unique for the purposes of locating a PWSF based on the need for strict adherence to the grid plan. As part of its initial deployment in the State of Texas, engineers at VZW have identified the need for a PWSF within the City of El Paso. Based on a computerized engineering study considering local population density and topography, engineers at VZW have issued a "Search Ring" identifying the necessary location for a PWSF in this area. This Search Ring represents the area in which a facility must be located to allow it to function as an integral unit in the wireless network system in the State of Texas and the El Paso area. PWSF facilities are laid out in a grid pattern and the spacing, height and location of this component site are critical for the successful operation of the network. The subject property meets the engineering criteria for the necessary PWSF in this area. If the strict letter of the regulations were carried out, the PWSF could not be constructed due to the separation distance regulation of one-half mile. The hardship has resulted from the need to locate a PWSF within the grid pattern at a height that is necessary for antennas to receive and transmit signals. The hardship is a result of wireless technology and has not been created by any person having an ownership interest in the property.

- 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.

Refer to Tower Location map and tower spreadsheet list Exhibit for the existing PWSFs located within a one-half (1/2) mile from VZW's proposed stealth PWSF.

- e. Height Restriction. Ground-mounted PWSF antenna support structures shall not exceed seventy-five feet in height, except as provided in subsection (E)(1)(f).

Refer to the Site Plans, Sheet C3 for the height dimension of VZW's proposed stealth PWSF at 50'. VZW is proposing a 50' stealth Light Pole Standard that meets the required overall height.

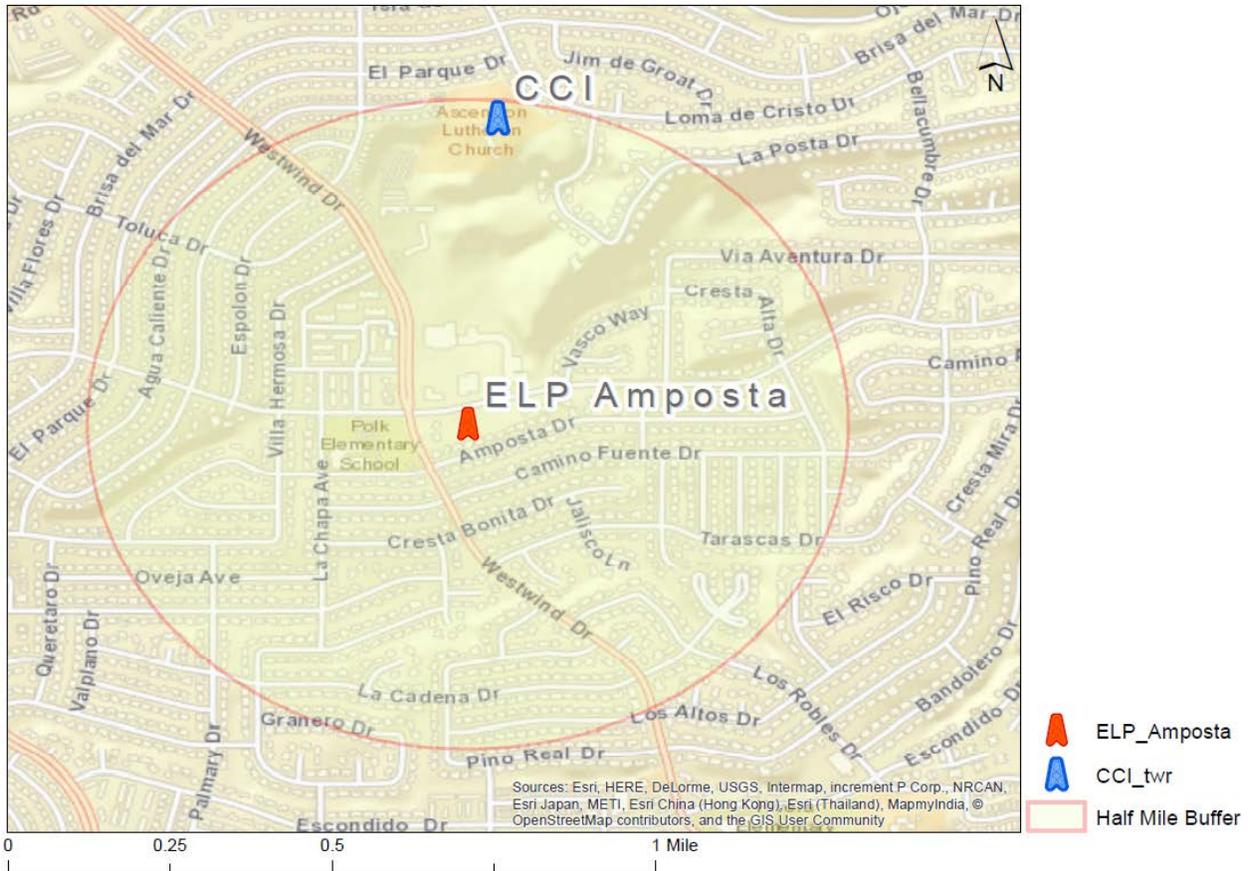
- f. Modified Height Restriction. If the applicant is collocating two or more antennas on a structure or if the structure is camouflaged, then the height for a PWSF antenna support structure shall not exceed one hundred feet.

Not applicable.

- g. Camouflage and Screening.

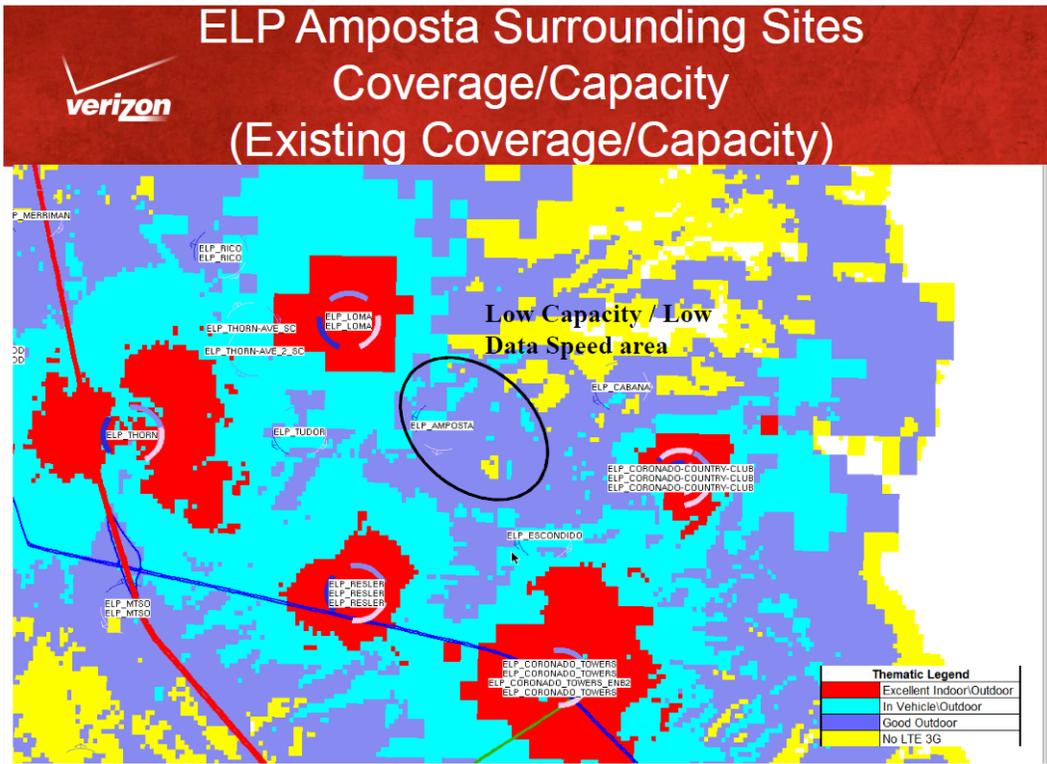
- i. All Ground-Mounted PWSF Shall be Camouflaged. Camouflaging is a method of disguising or concealing the appearance of an object by changing its usual color,

VZW ELP AMPOSTA - 1/2 MILE RADIUS

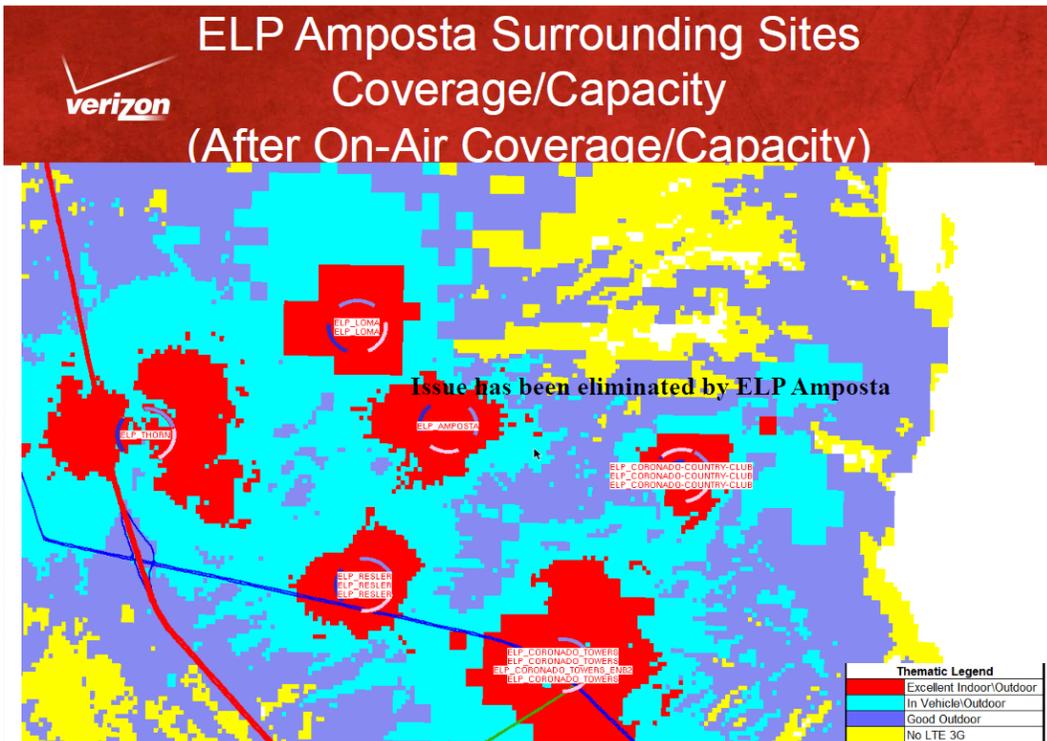


LATITUDE	LONGITUDE	TWR OWNER	SITE NUMBER	SITE NAME	ADDRESS	TWR TYPE	STRUCTURE HT	DISTANCE FROM Belvidere & Westwind (MILES)
31.8590	-106.5398	CCI	822420	Ascension Lutheran	6520 Loma de Cristo Drive, El Paso, TX 79912	Lightpole	40'	0.48

ATTACHMENT 8: COVERAGE MAP



EXISTING



PROPOSED