

December 20, 2024

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**T-MOBILE ANTENNA FACILITY TOWER AT 1301 CLYDE DRIVE
REQUEST FOR CONDITIONAL USE AND A SETBACK VARIANCE**

Petitioner and Proposal

T-Mobile is one of the top wireless carriers in the U.S. and to maintain seamless coverage in Naperville, T-Mobile is seeking zoning approval to erect a new wireless telecommunications tower next to the water tank to replace the existing Naperville water tank lease that expires in August of 2025. The details of the proposed site are further described below and in the attached plans and photos.

Reason for the petition

T-Mobile has leased space on the existing water tank located on this parcel since 2000. That lease expires in August of 2025 and while the city is not interested in renewing this lease, they are willing to lease space next to the tank for a new tower since they know T-Mobile and other carriers need to provide wireless service to the community. This city owned tower will hold T-Mobile as well as AT&T and Verizon, who have expressed interest in leasing space. Without this site, T-Mobile will suffer a significant coverage gap since there are no viable alternatives to consider. More details on the coverage needs and the alternatives sites are covered below and in the attachments.

Property Description

1301 Clyde Drive is zoned R1A and it has been the home of the city's 160' water tank for the past 60 years as well as T-Mobile since 2000. The proposed tower location is about 60' from the tank and right next to the existing city building, which is no longer in use. T-Mobile is proposing to rehab this building to make it available for T-Mobile's equipment as well as AT&T and Verizon. The building lease area will consist of three (3) 22' x 15' rooms for equipment cabinets, utility meters, and backup generators for emergency power. The enclosed drawings and photo simulations detail where the site will be located between the 160' water tower and the 115' power lines that run along 75th Street. T-Mobile is proposing to paint the tower white to match the tank and the power line towers.

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Components and Operations

As with other wireless sites in the city of Naperville, the proposed facility will be unstaffed and upon completion will require only infrequent maintenance visits (approximately one or two times a month) by a service technician and will not have any material impact on traffic or parking.

The proposed facility is entirely self-monitored by sophisticated computers that connect directly to a central office which alerts personnel to equipment malfunction or breach of security. Moreover, no material noise, glare, smoke, debris, traffic flow, or any other nuisance will be generated.

The proposed facility will be designed and constructed to meet applicable governmental and industry safety standards. Specifically, T-Mobile will comply with FCC and FAA rules governing construction requirements, technical standards, interference protection, power and height limitations, and radio frequency standards.

Nature of Request/Zoning Analysis

T-Mobile is seeking a Conditional Use for a new Communication Facility, as stated in section 6-13-5 of the zoning code. T-Mobile is also seeking a setback variance from section 6-13-10:5.3.1, which requires a 200% setback of the tower height to the abutting residential property line. T-Mobile is proposing 190' to get the signal above the water tank to avoid interference and create sufficient space for collocation Verizon and AT&T. Collocation by all three carriers would reduce the need for any carrier to place new infrastructure within the area. Per the City's preferred location on the parcel, the distance from the proposed facility is 132' to the east neighboring property lot line, 232' to the north neighboring property lot line, 135' to the west neighboring property line and 250' to the south neighboring property lot line. The existing tank in comparison is about 130' to the east, 265' to the north, 81' to the west and 163' to the south. The Naperville Zoning Code states in relevant parts:

Section 6-13-5.1 and 6-13-5.1.1 – Conditional Uses:

Conditional Use Permitted: The following uses may be permitted as a conditional use in all zoning districts subject to the provisions and procedures set forth in Section 6-3-8 of this Title, provided that the requirements set forth in this Chapter including Section 6-13-10, "General Requirements" are complied with.

Section 6-13-10:5.3.1 -Setbacks:

From a lot line abutting or across a public right-of-way from a residential use or district: a setback equal to the greater of the required building setback in the applicable zoning district or at least two hundred (200) percent of the Height of the facility shall be required.

We look forward to discussing this proposal and thank you for providing T-Mobile with the opportunity to address the Planning Commission.

Sincerely,

Ray Shinkle

Insite RE, Inc.

Authorized agent for T-Mobile

EXHIBIT C

Section 6-3-8

Standards For Conditional Uses: Any recommendation by the Planning and Zoning Commission and any decision by the City Council shall be predicated on evidence and findings that:

2.1. The establishment, maintenance or operation of the conditional use will not be detrimental to, or endanger the public health, safety and general welfare; and

The proposed wireless facility will not be detrimental, or endanger the public health, safety and general welfare. T-Mobile has been a tenant on this parcel since 2000 and needs to continue to provide its service to the community. The proposed city owned tower will also enable additional carriers to collocate as well and both AT&T and Verizon have expressed interest in the site and thereby eliminate the need for each carrier to construct new infrastructure. Wireless technology provides convenient, reliable, everyday communications to its users in Naperville and does not interfere with any other form of communication, public or private. Wireless technology affords vital communications in emergency situations and will commonly be used by residents and emergency personnel to protect the general public's health, safety and welfare.

Wireless technology provides many benefits that contribute to the general welfare of the communities it serves. These services include, but are not limited to, the following:

- 911 program allowing motorists to summon aid and report dangerous situations.
- Support for emergency services by providing wireless communications to paramedics, firefighters, and law enforcement agencies.
- The ability to transmit data allowing for immediate access to vital information.
- A backup system to the landline system in the event of a natural or man-made disaster.
- Immediate wireless communication capabilities inside and outside of the home, enhancing the safety of residents by allowing immediate access to emergency assistance.
- Seamless wireless coverage for the busy lives of people in the city reducing stress and increasing productivity.

2.2. The conditional use will not be injurious to the use and enjoyment of other property in the immediate area for the purposes already permitted, nor substantially diminish and impair property values within the neighborhood;

Wireless technology does not have an adverse effect on matters affecting the public's health, safety and general welfare. On the contrary, wireless technology affords vital communications to emergency personnel to protect the general public's health safety and welfare. These emergency services, previously mentioned, include 911 service, the ability to transmit vital data, and a backup system to landline phone communication, to name just a few.

The establishment, maintenance and operation of the proposed facility will be wholly contained in the internal building space lease area. Wireless communication technology does not interfere with any other form of communication or utility, whether public or private. T-Mobile have been

EXHIBIT C

sensitive in designing a site that will minimize the impact on the surrounding property. The facility will be compatible with the existing environment for the purposes already permitted and will not be injurious to the use and enjoyment of surrounding properties in the community. T-Mobile has been operating an antenna facility on top of the tank for the past 24 years and the site will be located between the 160' tank and the 115' power line towers, which are already part of the visual landscape. The wireless facility is unstaffed, and accordingly, there will be no impact to the existing traffic patterns, nor will there be any traffic hazards or nuisances generated. Maintenance personnel will visit this site on average once or twice a month, and thus, the safety and efficiency of public streets will be maintained.

2.3. The establishment of the conditional use will not impede the normal and orderly development and improvement of the adjacent property for uses permitted in the district.

T-Mobile has been a wireless tenant on this parcel since 2000 and has not impeded the normal and orderly development and improvement of adjacent properties. In fact, Seamless wireless coverage in the area has become a necessity to the neighboring properties and the proposed facility will maintain T-Mobile's coverage and allow additional carriers to collocate as well. The proposed facility is a result of the city preferring a tower versus collocating on the existing water tank. The enclosed photo simulations show how the site will blend in with the 160' white water tank and the 115' white power lines that run along 75th street.

2.4. The establishment of the conditional use is not in conflict with the adopted comprehensive master plan.

Collocation on existing structures is always the preferred option. With the water tank not being available, the only other collocation opportunity to consider is the Naperville Congressional Church steeple, located at 1 Bunting Lane. Sprint rebuilt the steeple in 2007 to hold its antennas, but the site was decommissioned in 2022. The issue with the steeple site is only one (1) carrier can lease space with a "stacked" antenna array at 84' and 78'. This is well below the optimal height to provide adequate coverage per T-Mobile's coverage objective, as shown in the attached RF coverage map. Moreover, the tight space prohibits the preferred antenna size, so T-Mobile is limited to smaller antennas that limit the spectrum options. Even if T-Mobile could make the steeple work, that leaves AT&T and Verizon without a site. The proposed tower fills a need for T-Mobile and provides an excellent collocation opportunity to AT&T, Verizon and others, which is in harmony with the code and master plan. Also, leasing space from the city allows the rental revenue to go back to the community versus the private sector.

Section 6-3-6

Standards For Variances: Any recommendation by the Planning and Zoning Commission and any decision by the City Council shall be predicated on evidence and finding that:

2.1 The variance is in harmony with the general purpose and intent of this Title and the adopted comprehensive master plan;

EXHIBIT C

The requested setback variance T-Mobile is seeking is in harmony with the general purpose of the master plan regarding the underlying zoning district and the placement of antenna facilities. In order to build it for collocation for other carriers, T-Mobile is proposing a 190' tower to get above the 160' water tank and avoid signal blockage and due to the limited locations to place the tower on the parcel, we need a setback variance to the adjacent residential property line. While it is not easy to hide a tower of this height, the existing tree line, adjacent 160' tank and the 115' power line towers allow it to "blend" in. See the attached photo simulations.

2.2 Strict enforcement of this Title would result in practical difficulties or impose exceptional hardships due to special and unusual conditions which are genuinely not found on other properties in the same zoning district;

Collocation on existing structures is always the preferred option for new antenna facilities, but the tank is no longer an option for the carriers and the steeple is a limited coverage option due to the limitation in height and constraint in space for just one carrier where the proposed tower immediately adjacent to the existing water tank addresses coverage for T-Mobile and additional carriers to provide seamless wireless coverage to the Naperville community. The city will own the facility and lease space to the carriers and based on the design of the property and the existing city facilities, we are limited in locations for the tower and the proposed location works best for all parties. New towers in or near residential zones are not unheard of in Naperville. There are two (2) just south located at 1800 S. Washington Ave, which are owned and leased to wireless carriers. Less than two miles east along 75th located at 24W745 75th Street there are three (3) clustered towers located near residential. Less than 2 miles to the southwest located at 27W200 87th St., Naperville, are two towers abutting residential. T-Mobile is also a tenant in all three (3) of these locations,

2.3 The variance, if granted, will not alter the essential character of the neighborhood and will not be a substantial detriment to adjacent property;

Granting the setback variance for the wireless antenna facility will enhance this development and the surrounding developments by enabling T-Mobile and other carriers to provide seamless wireless service. T-Mobile has become established and accepted as an integral part of the Nation's communications infrastructure which benefits the public's health, safety, morals, comfort, and general welfare. The proposed facility will meet all applicable health and safety standards. Recent studies have found that the use and value of adjoining properties are not adversely affected by facilities such as proposed. People understand the need for these facilities, and they have become common among the nation's landscape. The establishment, maintenance, and operation of the proposed facility will be wholly contained on the tower and in the renovated shelter and will not interfere with any other form of communication or utility, whether public or private. T-Mobile has been sensitive in selecting and designing a site that will minimize the impact on the surrounding property. It will be compatible with the existing environment for the purposes already permitted and will not be injurious to the use and enjoyment of surrounding properties in the community. The facility will be unstaffed, and accordingly, there will be no impact on the existing traffic patterns, nor will there be any traffic hazards or nuisances generated. Maintenance personnel will visit this site on average once or twice a month, and thus, the safety and efficiency of public streets will be maintained.

EXHIBIT C