

**Via: USPS Priority Mail**

October 16, 2020

Mr. Brian Jensen  
Development Services Superintendent  
Department of Public Works & Development Services  
Racine County  
14200 Washington Avenue  
Sturtevant, WI 53177

**Re: Conditional Use Permit Application Submittal/ PI Tower Development, LLC & Verizon Wireless-New Mobile Service Support Structure and Mobile Service Facility/Milam Property located at 28709 County Line Drive, Waterford, WI 53185. Parcel ID #(s): 016-04-19-01-013-010 (Access) & 016-04-19-01-013-000 (Facility/Use).**

Dear Mr. Jensen,

On behalf of our client(s) PI Tower Development LLC (“Lendlease”) and Verizon Wireless, enclosed please find the required project information along with a completed Racine County Conditional Use Permit/Site Plan Review application form. This application and its corresponding submittal information have been prepared in accordance with the State of Wisconsin Mobile tower siting regulations found at Wis. Stat. Sect. 66.0404. The application procedures for a new mobile service support structure (tower) and mobile service facility (communications equipment) are found at Wis. Stat. Sect. 66.0404(2)(b) and list six (6) requirements for a completed application.

Below is a narrative on these six (6) requirements, including the specific project information. I have also enclosed a copy of the State of Wisconsin regulations for your reference as you review this submittal.

**1. The name and business address of, and the contact individual of, the applicant.**

Applicant (s):  
PI Tower Development LLC  
Attn: Jennifer Brown  
2320 Cascade Pointe Blvd., Suite 300  
Charlotte, NC 28208

Contact Individual:  
Peter Schau  
Ton 80 Realty Services, Inc.  
8463 Old County K  
Harshaw, WI 54529

Verizon Wireless  
1515 Woodfield Road  
Schaumburg, IL 60173

**RECEIVED**

OCT 21 2020

**2. The location of the proposed support structure.**

28709 County Line Drive, Waterford, WI 53185  
Parcel ID #(s): 016-04-19-01-013-010 (Access) & 016-04-19-01-013-000 (Facility/Use).

**RACINE COUNTY**



The location of the proposed 155' monopole tower structure (160' overall with lightning rod) is in the northwest corner of the 47.81 acre parcel, assigned PIN # 016-04-19-01-013-000, within a 75' x 75' lease area as depicted in the enclosed survey and construction drawings.

**3. The location of the proposed mobile service facility.**

28709 County Line Drive, Waterford, WI 53185

Parcel ID #(s): 016-04-19-01-013-010 (Access) & 016-04-19-01-013-000 (Facility/Use).

Lendlease proposes to construct a 155' monopole type tower structure (160' overall with lightning rod) for the immediate use by Verizon Wireless in the northwest corner of the 47.81-acre property at 28709 County Line Drive, Waterford, WI 53185. This new tower structure will be located within a 75' x 75' ground lease area as depicted in the enclosed survey and construction drawings. Verizon Wireless will locate its antennas and equipment upon the tower at the 150' centerline, route its coax/cabling down the inside of the tower to the its ground facilities. The Verizon Wireless ground facilities will consist of an 8' x 10' base station equipment cabinet cluster and free-standing Diesel fueled backup power generator. Both will be located upon new concrete pad foundations at grade near the base of the tower structure within the Lendlease ground lease area. Also, the monopole tower and compound is designed to accommodate at least three (3) additional similar wireless telecommunications equipment installations besides the one contemplated by Verizon Wireless.

**4. If the application is to substantially modify an existing support structure...**

The application is for a new 155' monopole tower (160' overall with lightning rod), therefore the submittal requirements of this section are not applicable.

**5. If the application is to construct a new mobile service support structure, a construction plan which describes the proposed mobile services support structure and the equipment and network components, including antennas, transmitters, receivers, base stations, power supplies, cabling, and related equipment to be placed on or around the new mobile service support structure.**

See the enclosed construction drawings depicting the proposed Lendlease and Verizon Wireless installations containing the above described information.

**6. If the application is to construct a new mobile service support structure, an explanation as to why the application chose the proposed location and why the applicant did not choose collocation, including a sworn statement from an individual who has the responsibility over the placement of the mobile service support structure attesting that collocation within the applicant's search ring would not result in the same mobile service functionality, coverage, and capacity; is technically infeasible; or is economically burdensome to the mobile service provider.**

The Verizon Wireless search ring is depicted in the enclosed Delorme Map labeled "*Verizon Wireless Search Area: Tichigan Site*", where there are no existing structures of any kind within the defined search area available for collocation by Verizon Wireless.

However, as a matter of industry best practices, Verizon Wireless always evaluates the closest existing structures to its defined search area to assess their viability prior to seeking approval for a site which will



require the construction of a new mobile service support structure as contemplated under this application. In this regard, there was one existing structure in nearby proximity to the Verizon Wireless search area which was evaluated prior to the selection of the subject location.

The nearest existing structure to the proposed site location is an existing 190' tall SBA Communications owned self-support lattice tower located at W224 S10030 Big Bend Drive, Big Bend, WI 53103. This tower is located approximately 1.5 miles north-northeast the proposed site location and lying +/-4,200' or .81 mile north-northeast from nearest edge of the Verizon Wireless defined search area. This location was evaluated for use by Verizon Wireless but determined not to be a viable option because it is too far north from the target search area to meet Verizon Wireless' engineering needs for the site. To further explain, and referencing the enclosed map inventory of the Verizon Wireless sites currently operation in this local area network, as the proposed site location moves away from the target design area, it is simultaneously moving towards certain neighboring sites ("Artesian", "Mercury WT", "Muskego Dam Rd") and away from others ("Waterford FS", "Malchine Road"). When site locations in a network are too close together, service disruptions can occur due to the excessive overlapping of signal areas; and when they are too far apart, the signal will not carry far enough to maintain the needed level of service to meet the needs of the target areas, resulting in coverage gaps and inadequate site performance. Both instances would result in diminished service and system performance to the areas in need, and the continued need by the service operator to seek additional facilities within the same vicinity.

Enclosed in the application materials is a sworn statement from the Verizon Wireless Radio Frequency Engineer responsible for this project attesting to the fact that collocation is not a feasible option for this site, as there are no existing structures of any kind which exist within the Verizon Wireless Search Area that could be utilized for a collocation. However, though not required by the prevailing state statutes, we felt that providing this additional explanation of the Verizon Wireless site selection process, including its evaluation of the closest existing structure to its target search area as detailed above was appropriate.

### **ADDITIONAL DISCUSSION**

This is a joint application for a proposed new mobile service support structure (tower) which will be owned by PI Tower Development LLC ("Lendlease"), a national owner and operator of wireless communications infrastructure; and a mobile service facility (antenna and equipment) installation upon this new support structure by its proposed tenant, Verizon Wireless. It is not uncommon for wireless telecommunications service providers to engage the services of a tower company to construct, own, and operate the infrastructure upon which they desire locate their equipment. In this case, Verizon Wireless needs the site to meet its service needs for the defined search area, and has engaged Lendlease to participate as the tower developer/owner for the project.

As described above, the proposed project is for the construction, installation, and operation of an unmanned wireless communications tower facility upon the 4.81-acre property at 28709 County Line Drive, Waterford, WI 53185. This facility will consist of Verizon Wireless antennas and equipment to be mounted at the 150' centerline of a newly constructed Lendlease owned 155' monopole tower (160' with lightning rod), associated coaxial/hybrid cable runs down the inside of the tower, route its coax/cabling down the inside of the tower to the its ground facilities. The Verizon Wireless ground facilities will consist of an 8' x 10' base station equipment cabinet cluster and free-standing Diesel fueled backup power generator. Both will be located upon new concrete pad foundations at grade near the base of the tower structure within the Lendlease ground lease area. Also, a 20' wide access and utility easement will



be utilized to serve the site, entering the property from the public way via the existing driveway from County Line Drive to the north.

This Conditional Use Permit will result in a great benefit for the community, in that it will allow for the continued provision of the highest quality, and most technologically advanced wireless communication services to the nearby resident and visitor populations of the Waterford area. Besides the services which will be provided by Verizon Wireless, the tower facility has been designed so it will be available for at least three (3) other comparable antenna and equipment installations, and shall conform to all applicable ANSI/TIA 222-G, FCC, and FAA regulations and standards governing such facilities. Multiple company collocations on its infrastructure is the core of Lendlease's business, and Lendlease actively markets its portfolio of tower sites for collocation to all communication users nationwide and will do so for this site as well.

The proposed facility will not require any public participation, or result in any public cost for public facilities and services which would be detrimental to the economic welfare of the community. In fact, the wireless communication services offered by Verizon Wireless are desired by both businesses and individuals, and will be an economic asset to the community. The enhanced E-911 services provided by facilities such as these will also assist in the protection of the public health, safety, and welfare of the community.

The equipment will operate continuously at this unmanned facility and will require no additional parking or facilities for employees. Verizon Wireless' cell site technicians will visit the site periodically, typically a couple hours once per month, for the testing and monitoring of the maintenance and security of its equipment. Lendlease personnel will also visit the site periodically to monitor the maintenance and security of the facility. The facility will not generate any substantial traffic, and besides the new tower structure, the remainder of the equipment has a minimal visual impact and generates very little noise.

This site is located upon a property in the A3-General Farming Zoning District on a large parcel that abuts other agriculturally or conservancy (Waukesha County HG-High Ground Water District to north) zoned parcels and uses on all sides in the vicinity of the facility. The large parcel does also abut a residentially zoned district on the south end of the parcel whose closest boundary is approximately 1,500' from the proposed site location. The proposed site has been positioned upon the underlying parcel to best conform with the current and potential future use(s) of the property and in a manner to provide a substantial buffer distance to this district and its more densely populated residential subdivisions to the south and southwest. As demonstrated by the enclosed photo simulations of the future tower facility from the surrounding area view sheds, the combination of these large setback distances, local topography, and the natural wooded features of the surrounding area and parent parcel will eliminate it from view to the closest surrounding public view sheds from the north, south, and west. It will be most visible from the north and east across the agricultural fields where the front County Line Drive and Big Bend Road. A landscaping buffer will also be installed around the perimeter of the compound to assist in minimizing any potential impacts to these nearby view sheds.

The location of the proposed tower upon the property is setback from the nearest property line by approximately 62.5', a distance that is less than the height of the proposed tower structure. However, enclosed please find a stamped engineering letter and structural report from Ehresmann Engineering, Inc., Lendlease's tower manufacturer, ensuring that that the tower will be designed to accommodate at least three additional users and collapse within the subject property in the event of structural failure allowing



for a reduction in this setback under both Wis. Stat. Sect. 66.0404(2)(4)(g) as well as Sec. 20-1433(a) of the Racine County Zoning Ordinance. However, it is important to understand that this setback is to an internal parcel line of two abutting parcels that make up the underlying property owners home and farmstead, and that the distance from the base of the tower structure to the next property west featuring different ownership is +/-212', and from the base of the tower to north property line is +/-206', both well in excess of the overall 160' height of the proposed tower and its appurtenances. For all of these reasons, we feel the proposed use is harmonious with the existing use and character of the underlying parcel and the surrounding area.

Besides the six (6) application requirements defined by Wis. Stat. Sect. 66.0404(2)(b), I have also enclosed a copy of the FAA Determination of No Hazard to Air Navigation for the proposed tower at this location, proof of notification to all airport operators or private landing strips within a three (3) mile radius of the proposed site location, a copy of the memorandum of lease fulfilling the requirements sought in Sec. 20-1421(3) of the Racine County Zoning Ordinance, a tabular and map inventory of all of both Lendlease and Verizon Wireless facility locations in Racine County with the information sought in Sec. 20-1423 (8) of the Racine County Zoning Ordinance, abutting property owner list derived from the Racine and Waukesha County On-Line GIS systems, a signed letter acknowledged by the fee owner of the property consenting to the conditional use permit application be filed upon their property, and a check made payable to Racine County in the amount of \$675.00 for the applicable Conditional Use (\$475.00) and Site Plan Review (\$200.00) application fees.

Finally, I believe the above information satisfies the applicable application requirements as defined by the Racine County Zoning Ordinance and as preempted by Wis. Stat. Sect. 66.0404; and is ready to be scheduled for consideration by the Racine County Economic Development & Land Use Planning Committee. I look forward to the public hearing for this request, and will be present at the meeting to address any remaining questions that the commission or members of the public may have regarding the application and proposed use of the site.

Should you have any additional information needs or questions regarding the application, the enclosed materials, or the proposed use of the site, please contact me directly at (773) 919-5112, or by e-mail at [pschau@ton80realtyservices.com](mailto:pschau@ton80realtyservices.com).

Sincerely,

*Peter Schau*

Peter Schau  
Ton 80 Realty Services, Inc.,  
on behalf of Lendlease  
and Verizon Wireless

*Enclosures as described*

CC: Tina Mayer-Town Clerk  
Town of Waterford  
415 N. Milwaukee Street  
Waterford, WI 53185

# TON 80

REALTY SERVICES, INC.

August 14, 2020

Mark F. Milam  
Taffilyn M. Milam  
28709 County Line Drive  
Waterford, WI 53185

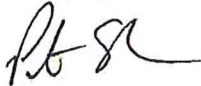
**Re: PI Tower Development LLC/Verizon Wireless-Mobile Service Support Structure and Facilities / Milam Property-28709 County Line Drive, Waterford, WI 53185.**

**PIN #: 016-04-19-01-013-010 & 016-04-19-01-013-000**

Dear Mark & Taffilyn,

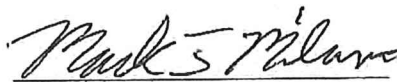
Please acknowledge this letter below as evidence of your consent for Ton 80 Realty Services, Inc. to file any and all necessary zoning, building, erosion control, and other governmental use applications required for the proposed use of a Mobile Service Support Structure and Facilities upon the above referenced property, by PI Tower Development LLC as your tenant, and Verizon Wireless as PI Tower Development LLC's prospective subtenant, with the Town of Waterford and Racine County on your behalf as the fee owner of the property.

Sincerely,



Peter Schau  
On behalf of PI Tower Development LLC  
and Verizon Wireless

Acknowledged this 26 day of  
August, 2020



Mark F. Milam

RECEIVED

OCT 21 2020

RACINE COUNTY



Taffilyn M. Milam