

#### **PETITION DESCRIPTION** I.

Petition:	Conditional Use: 2013-16 CU 1
Project Name:	Clearview Communication Tower at Wellington Marketplace
Owner/Petitioner:	FWI 16, LLC / Way John, Inc. / Clearview Tower Company, LLC.
Agent:	Cliff Hertz, P.A. of Broad and Cassel, Attorneys at Law
Request:	The petitioner is requesting a Conditional Use to allow a 120 feet wireless communication tower within the Wellington Marketplace project.

# II. SITE DATA

Existing Use:	Developed with Retail, Restaurant, Office, Bank and Movie Theater	
Parcel Size:	19.49 acres (Wellington Marketplace)	
Existing Land Use:	Community Commercial	
Existing Zoning District:	Planned Unit Development (PUD)	
Parcel Control No's.: 73-41-44-08-04-001-0000 and 73-41-44-08-04-002-0000		
Location:	The subject property is located on the northeast intersection of Wellington Trace and Greenview Shores Boulevard. Exhibit "A" is	

a Location Map and Exhibit "B" is the legal description.

# III. LAND USE AND ZONING

EXISTING LAND USE, FUTURE LAND USE & ZONING					
Dir.	Existing Land Use	Future Land Use	Zoning		
North	Sugar Pond Manor	Residential F	Planned Unit Development (PUD)		
South	Courtyard Shoppes at Wellington	Community Commercial	Planned Unit Development (PUD)		
East	Sugar Pond Manor	Residential F	Planned Unit Development (PUD)		
West	Sugar Pond Manor	Residential F	Planned Unit Development (PUD)		

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## IV. SITE HISTORY

The Wellington Marketplace was approved and constructed in the 1980s under Palm Beach County regulations. The 19.49 acre shopping center is currently developed with 191,677 square feet of mixed Retail, Restaurant, Office, Bank and Movie Theater.

The agent Cliff Hertz, P.A. of Broad and Cassel, Attorneys at Law, on behalf of the property owner/petitioner submitted Variance and Conditional Use applications on April 17, 2013 to allow a wireless communication tower within the Wellington Marketplace project.

# V. DEVELOPMENT REVIEW COMMITTEE (DRC)

The Variance (VAR) and Conditional Use (CU) applications were certified for public hearings at the May 22, 2013 DRC meeting.

#### VI. STAFF ANALYSIS

The agent Cliff Hertz, P.A. of Broad and Cassel, Attorneys at Law, on behalf of the property owner/petitioner, is requesting a Conditional Use to allow a 120 feet wireless communication tower within the existing Wellington Marketplace site as indicated on the proposed site plan (Exhibit C). Wellington's Land Development Regulations (LDR) Section 6.4.4.27.i.v. requires Conditional Use approval for new wireless communication towers 61 feet in height or greater in the Commercial, Commercial Recreation, Park and the Institutional/Public Facilities/Utilities Land Use on parcels 10 acres or greater. The LDR requires proposed towers within a commercial property greater than 10 acres and to be stealth or camouflage design to be compatible with existing uses of the site. Examples of stealth towers provided in the LDR include architecturally screened roof-mounted antennas, antennas integrated into architectural elements and wireless communications towers designed to look like light poles, power poles, trees, flag poles, clocks, steeples or bell towers and of the same height and the same nature emulated. The petitioner is proposing a monopole flag pole tower as indicated in Exhibit "F." A monopole tower means a wireless communications tower consisting of a single pole or spire supported by a permanent foundation, constructed without guy wires and ground anchors.

The proposed tower is located in the southwest portion of the site and separated from the residentially zoned properties on the southwest by 482 feet which does require approval for a reduced separation variance. The Planning, Zoning and Adjustment Board (PZAB) approved the reduced separation of 482 feet at the September 9, 2013 meeting. A tower less than 60 feet in height requires a separation 400 feet from residential properties and towers greater than 61 feet in height requires a separation 600 feet in Commercial Land Use Designation as a Conditional Use if all requirements of LDR Section 6.4.4.27. (Wireless Communications Towers and Antennas) and Section 5.4.4.E. are met. The approval of the separation variance by the Planning, Zoning and Adjustment Board (PZAB) was required for the requested CU to be considered by Council.

The required minimum setback for this commercial pod is 25 feet from Greenview Shores Boulevard and Wellington Trace along with 40 feet from the north and east residential property lines. The site has access from Wellington Trace and Greenview Shores Boulevard. The proposed tower will not have any traffic impact and complies with the Traffic Performance Standards of Wellington and Palm Beach County. This 19.49 acre Prepared by: Damian Newell Petition No.: 2013-16 CU1 Prepared for: November 12, 2013 Council Meeting November 4, 2013 site currently has a shared parking study prepared by Simmons & White (Revised date August 23, 2011) which is in accordance with the LDR. If the proposed tower will reduced the parking spaces below the excess spaces indicated by the current shared parking study a new study will be required or additional parking spaces will be required on-site. This request will require amendment to the previously approved uses, site design, parking spaces, landscaping, etc. and a more detailed review of the proposed site plan will be required as part of the subsequent Site Plan Amendment process.

# Standards for granting a Conditional Use

Wellington's Land Development Regulations Section 5.4.4.E. requires Conditional Use requests to comply with the below nine (9) standards. A Conditional Use which fails to meet any of the standards listed below shall not be approved by the Village Council and shall be deemed adverse to the public interest.

1. **Consistent with Comprehensive Plan.** The request for a Conditional Use to allow a tower is not consistent with Wellington's Comprehensive Plan Infrastructure Element Objective 1.7 for Managed Growth, Policy 1.7.1. which requires maximizing the use of existing and future infrastructure. This request has not demonstrated why maximizing the existing towers with additional antennas or other available technology and/or installing available technology on existing or new infrastructure (buildings, utility poles, etc.) could not meet the indicated coverage requirements of the two (2) current providers/users without the need for a new wireless communication tower.

The Wellington Wireless Telecommunications Consultant report (Exhibit J) indicates the petitioner has not adequately demonstrated the proposed 120 foot tower height is necessary and minimum required to cover key objective areas from the proposed location. Based on the report (Exhibit J) an 80 foot tower may be adequate height but a more detailed coverage map needs to be provided by the applicant to determine whether Big Blue trace would receive the coverage desired from the proposed Wellington Marketplace location. Based on the petitioner provided cover maps and Wellington's consultant report, the petitioner could meet a portion if not all of their coverage needs with the following alternatives which will minimize impact:

- a) One (1) or more 60 foot tower(s) and use of existing or proposed distributed antenna system (DAS) in this area without the need for a Conditional Use.
- b) One (1) 80 foot tower and use of existing or proposed distributed antenna system (DAS) in this area. A Conditional Use approval is required but the lower tower height would minimize visual impact.
- c) Deployment of community distributed antenna system (DAS) on existing utility poles or within/on existing buildings in this area. These systems are currently being used in Wellington and may reduce or eliminate the need for additional towers. The petitioner as indicated wireless data traffic has increased and will continue in the future which will require additional towers or use of new technology such as DAS. The use of DAS technology can boost coverage, improve reliability and enhance network capacity in hard to serve areas as indicated by one of the proposed providers/users (AT&T Wireless <a href="http://www.att.com/gen/press-room?pid=23351">http://www.att.com/gen/press-room?pid=23351</a>). Also the Consultant's report (Exhibit J of the Staff Report) indicates AT&T has deployed a DAS on Florida Atlantic University campus to distribute signal to more than 30,000 customers. A DAS deployed on existing utility poles or within/on

existing buildings will not require a Conditional Use approval.

The request fails to meet this standard as the proposed new 120 foot wireless communication tower is not consistent with Infrastructure Element Objective 1.7 for Managed Growth of the Comprehensive Plan.

2. **Complies with supplementary use standards**. The proposed Conditional Use does not comply with all relevant and appropriate portions of LDR Sec. 6.4.4.27. Supplementary Use Standards as it relates to wireless communication tower and antennas facilities. The requested 120 feet wireless communication tower required a variance to decrease the minimum 600 feet separation from residentially zoned property to 482 feet for Commercial Land Use Designations/Zoning Districts. Staff notes the Planning, Zoning and Adjustment Board (PZAB) did approve the reduced separation of 482 feet at the September 9, 2013 meeting.

LDR Section 6.4.4.27.k.i.(a) requires the applicant to show inability to provide service from available sites including collocation in or out of Wellington; that no other suitable existing structures/tower or support structure is available, including utility poles; and no reasonable alternative technology exists that can accommodate the wireless communications facility. The petitioner has not shown with the use of coverage/propagation maps if the coverage needs of the two (2) proposed carriers can be accommodated with collocation, other suitable existing structures or other alternative technology. As indicated in the Wellington Wireless Telecommunications Consultant report (Exhibit J) the petitioner has not explained if or how coverage issues can or cannot be addressed with alternative technology, such as community distributed antenna system (DAS). A DAS deployed on existing utility poles or within/on existing buildings will not require a Conditional Use approval and will minimize impacts.

3. **Compatibility**. The Conditional Use to allow a 120 feet wireless communication tower is not compatible with the surrounding Residential F land use designation/multi-family properties. A wireless communication tower is not allowed within the Residential B through H Land Use designations. The petitioner requested a variance to decrease the minimum 600 feet separation from a residentially zoned property to 482 feet for this commercial pod in the Wellington PUD. Staff notes the Planning, Zoning and Adjustment Board (PZAB) did approve the reduced separation of 482 feet at the September 9, 2013 meeting. The proposed 120 foot tower is dramatically taller than flag poles, utility poles and light poles commonly found in Wellington and will be the highest structure in the surrounding area by approximately 80 feet (greater than any of the nearby commercial two story structures). The scale of the tower is not compatible with the surrounding properties and will have an adverse visual impact on the surrounding residential properties. Also as indicated in the Wellington Wireless Telecommunications Consultant report (Exhibit J) the proposed location of tower and compound in an open parking lot without sufficient landscape buffer or screening to conceal it is unusual. Staff notes the Wellington Marketplace landscaping is currently not in compliance with the LDR Article 7 Chapter 3 (Landscaping and Buffering) requirements along the perimeter and within the parking areas which will require additional landscaping.

The scale of this proposed 120 feet wireless communication tower fails to meet this standard as it's not compatible with the uses and character of the surrounding residential properties or this area of Wellington.

4. **Design minimizes adverse impact.** The proposed Conditional Use to allow a 120 feet wireless communication tower less than the required minimum 600 feet separation will not minimize impact on adjacent lands. The proposed white monopole flag pole tower as indicated in Exhibit "F" at 120 feet in height is dramatically taller than flag poles commonly found in Wellington and actually will attract visual attention from the surrounding properties. The scale of the proposed 120 feet tower will have an adverse visual impact on the surrounding properties and will be the highest structure in the surrounding area by approximately 80 feet greater than any of the nearby two story structures. The proposed 120 feet tower and compound are also being designed to accommodate up to five (5) providers which clearly does not minimize the impact on adjacent lands and is three (3) more providers than are required by the LDR.

LDR Section 6.4.4.27.k.ii.(e) (Co-location) requires new towers to be constructed with capacity for co-location as follows; one (1) user for tower less than 80 feet in height, two (2) users for towers 80 to 120 feet in height and three (3) users for towers 120 feet in height or greater. The petitioner indicated they currently have only two (2) providers for the proposed 120 feet tower with the potential of three (3) additional providers for a total of five (5) providers. The proposed 120 foot tower will have a provider/user at 120 feet, 108 feet, 96 feet, 84 feet and 72 feet. At the PZAB meeting the petitioner indicated a provider/user will not be located at 72 feet on the tower; however they are still proposing a total of five (5) providers/users.

LDR Sec.6.4.27.h.xix. (Advances in Technology) states: "All wireless communications service providers shall use and apply any readily available advances in technology that lessen the negative aesthetic effects of wireless communications facilities to the residential communities with the Village."

LDR Section 6.4.4.27.k.i.(a). (Application Process) states: "The use of existing structures as antenna mounts shall be preferred to the construction of new ground-mounted facilities. To be eligible to construct a new tower within the Village limits, the applicant must establish to the satisfaction of the Village that applicant is unable to provide the service sought by the applicant from available sites, including co-locations within the Village and in neighboring jurisdictions; and the applicant must demonstrate to the reasonable satisfaction of the Village that no other suitable existing tower or other support structure is available, including utility poles; and that no reasonable alternative technology exists that can accommodate the applicant's wireless communications facility"

The coverage/ propagation maps provided by Verizon Wireless (Exhibit D) and AT&T Mobility (Exhibit E) show no major difference in potential coverage between the tower heights at 80 or 120 feet and some difference in coverage with a tower height at 60 feet. The petitioner has stated a tower below 80 feet in height will limit them to one (1) or two (2) providers on a single tower primarily due to local tree canopy interference. The petitioner could request one (1) 60 foot or 80 foot tower for the two (2) current providers/users or a 60 foot tower for each provider/user. The Wellington Wireless Telecommunications Consultant report (Exhibit J) indicates the petitioner has not adequately demonstrated the proposed 120 foot tower height is necessary and the minimum required to cover key objective areas from the proposed location. Based on the report (Exhibit J), an 80 foot tower may be adequate height but a more detailed coverage map needs to be provided by the applicant to determine whether Big Blue Trace would receive the coverage desired from the proposed Wellington Marketplace location.

The petitioner has several reasonable alternatives including but not limited to other sites, reduced tower height and providing additional antennas or installing other available technology, such as DAS, on existing facilities within this area of Wellington that would meet the indicated coverage requirements of the two (2) current providers/users. Also the impact on adjacent lands could be minimized with a reduced tower height. Staff notes at the Planning, Zoning and Adjustment Board (PZAB) meeting the petitioner indicated, but did not provide documentation the adjacent Publix at the Courtyard Shops had a restriction on height that would exclude it as a possible tower location. The PZAB did approve the reduced separation of 482 feet and recommended approval of the Conditional Use at their September 9, 2013 meeting.

The petitioner could meet their coverage requirements while minimizing adverse impact with the following alternatives:

- a) One (1) or more 60 foot tower(s) and use of existing or proposed distributed antenna system (DAS) in this area without the need for a Conditional Use.
- b) One (1) 80 foot tower and use of existing or proposed distributed antenna system (DAS) in this area. A Conditional Use approval is required but the lower tower height would minimize visual impact.
- c) Deployment of community distributed antenna system (DAS) on existing utility poles or within/on existing buildings in this area. These systems are currently being used in Wellington and may reduce or eliminate the need for additional towers. The petitioner as indicated wireless data traffic has increased and will continue in the future which will require additional towers or use of new technology such as DAS. The use of DAS technology can boost coverage, improve reliability and enhance network capacity in hard to serve areas as indicated by one of the proposed providers/users (AT&T Wireless <a href="http://www.att.com/gen/press-room?pid=23351">http://www.att.com/gen/press-room?pid=23351</a>). Also the Consultant's report (Exhibit J of the Staff Report) indicates AT&T has deployed a DAS on Florida Atlantic University campus to distribute signal to more than 30,000 customers. A DAS deployed on existing utility poles or within/on existing buildings will not require a Conditional Use approval.

The request for a 120 foot tower fails to meet this standard as the proposed height does not minimize visual impact, the petitioner did not adequately demonstrated the proposed height is necessary or minimum required and if installing other available technology, such as DAS on/within existing facilities within this area of Wellington would meet the indicated coverage requirements of the two (2) current providers/users.

- 5. Adequate public facilities. This site is a developed 19.49 acre parcel with adequate potable water, sanitary sewer, solid waste, stormwater management, park, road, public school facilities, mass transit public facilities and fire-rescue that will be available to accommodate a wireless communication tower. The request for a Conditional Use to allow a new wireless tower is consistent with this standard.
- 6. **Design minimizes environmental impact.** There are no adverse impacts to the natural environment expected to occur as a result of this proposed Conditional Use request for a wireless communication tower. The request for a Conditional Use to allow a new wireless tower is consistent with this standard.
- 7. **Development patterns.** This site and adjacent properties are currently developed with no anticipated future development. The 19.49 acre Wellington Marketplace site is developed with 191,677 square feet of mixed Retail, Restaurant and Office uses. The

Wellington Marketplace and surrounding properties were previously developed in a logical and timely development pattern. The request for a 120 foot wireless communication tower fails to meet this standard as the proposed tower is an infill development in a parking lot with insignificant visual buffer which is not the logical, timely or orderly development patterns for this area.

8. Other relevant standards of Code. The 120 feet wireless communication tower proposed separation of 482 feet from residential zoned property does not comply with the LDR minimum 600 feet separation and required a variance which was approved by the Planning, Zoning and Adjustment Board (PZAB) at the September 9, 2013 meeting. The petitioner has several reasonable alternative locations that would minimize the separation or possibly avoid the need for a variance on other centrally located commercial or commercial recreation parcels in the Wellington PUD. The LDR allows tower height of 120 feet in Commercial Land Use Designation as Conditional Use (CU) if all requirements of LDR Section 6.4.4.27. (Wireless Communications Towers and Antennas) and Section 5.4.4.E. (Standards applicable to all Conditional Uses) are met. LDR Section 6.4.4.27.k.i.(a) requires the applicant to show inability to provide service from available sites including collocation in or out of Wellington; that no other suitable existing structures/tower or support structure is available, including utility poles; and no reasonable alternative technology exists that can accommodate the wireless communications facility.

The petitioner indicated they currently have only two (2) providers for the proposed 120 feet tower with the potential of three (3) additional providers for a total of five (5) providers. The coverage/ propagation maps provided by Verizon Wireless (Exhibit D) and AT&T Mobility (Exhibit E) show no major difference in potential coverage between the tower heights at 80 or 120 feet and some difference in coverage with a tower height at 60 feet. The petitioner has stated a tower below 80 feet in height will limit them to one (1) or two (2) providers on a single tower primarily due to local tree canopy interference. The petitioner could request one (1) 60 foot or 80 foot tower and use other alternative technology, such as DAS for the two (2) providers they currently have. LDR Sec.6.4.27.h.xix. (Advances in Technology) states: "All wireless communications service providers shall use and apply any readily available advances in technology that lessen the negative aesthetic effects of wireless communications facilities to the residential communities with the Village."

LDR Section 6.4.4.27.k.i.(a). (Application Process) states: "The use of existing structures as antenna mounts shall be preferred to the construction of new ground-mounted facilities. To be eligible to construct a new tower within the Village limits, the applicant must establish to the satisfaction of the Village that applicant is unable to provide the service sought by the applicant from available sites, including co-locations within the Village and in neighboring jurisdictions; and the applicant must demonstrate to the reasonable satisfaction of the Village that no other suitable existing tower or other support structure is available, including utility poles; and that no reasonable alternative technology exists that can accommodate the applicant's wireless communications facility"

The petitioner has not shown with the use of coverage/propagation maps if the coverage needs of the two (2) proposed carriers can be accommodated with collocation, other suitable existing structures or other alternative technology, such as DAS.

The petitioner requested a variance to decrease the required minimum 600 feet separation from a new tower to a residentially zoned property. The staff recommendation was the request did not meet the seven (7) standards for granting of a variance. Staff notes the Planning, Zoning and Adjustment Board (PZAB) did approve the variance to reduce the separation to 482 feet and also recommended approval of the Conditional Use at the September 9, 2013 meeting.

The request for a 120 foot wireless communication tower fails to meet this standard as the proposed tower required a separation variance which was approved by the PZAB; the petitioner did not adequately demonstrated the proposed height is necessary or minimum required; and if installing other available technology, such as DAS, on/within existing facilities within this area of Wellington would meet the indicated coverage requirements of the two (2) current providers/users.

9. **Consistency with neighborhood plans**. The site is not part of a Neighborhood Plan. The request for a Conditional Use to allow a new wireless tower is consistent with this standard.

Based upon the preceding analysis and Wellington's consultant report (Exhibit J) the request for Conditional Use (CU) to allow a 120 feet wireless communication tower fails to meet six (6) of the nine (9) Conditional Use standards which include the consistent with Comprehensive Plan, complies with supplementary use, compatibility, design minimizes adverse impact, development patterns and other relevant standard of Code. As indicated previously, a request which fails to meet any one (1) of the nine (9) standards for a Conditional Use approval shall not be approved by the Village Council and shall be deemed adverse to the public interest.

The applicant's justification for the Conditional Use is Exhibit "G." The applicant request for a proposed 120 feet wireless communication tower was also reviewed by Wellington's Wireless Telecommunications Consultant for compliance with local, state and federal laws, rules and regulations. The Consultant's report is attached as Exhibit "J."

### VII. PUBLIC NOTIFICATION / COMMENTS

As required by the Land Development Regulations and Florida Statutes, public notifications were placed in the Palm Beach Post, mailings were sent to property owners within 500 feet and the property was posted. All notices advised to the public that a public hearing on the proposed ordinance/resolution would take place. The dates of notices are set forth below.

# Planning, Zoning and Adjustment Board Meeting

Variance and Conditional Us	<u>se (1<sup>st</sup> Scheduled Meeting):</u>			
Mailings/Newspaper/				
Posted Signs:	On or before June 17, 2013			
Meeting Date:	July 2, 2013 (Postponed to August 7, 2013)			
and a second				
Variance and Conditional Use (2 <sup>nd</sup> Scheduled Meeting):				
Mailings:	July 16, 2013			
Meeting Date:	August 7, 2013 (Postponed to September 4, 2013)			

Variance and Conditional Use (3<sup>rd</sup> Scheduled Meeting):Meeting Date:September 4, 2013 (Rescheduled to September 9, 2013)

Variance and Conditional Use (4th Scheduled Meeting):Mailings/Newspaper/Posted Signs:On or before August 22, 2013Meeting Date:September 9, 2013

# **Council Meeting**

<u>Conditional Use</u> Mailings/Newspaper/ Posted Signs: Meeting Date:

On or before October 28, 2013 November 12, 2013

As of the date when the staff report was published for the November 12, 2013 Council meeting staff received one (1) letter (Exhibit H) opposing the approval of the tower and over 200 signatures from an online petition started by the applicant supporting the approval of the tower. Exhibit "I" is the letter with names and addresses provided by the applicant.

# VIII. PLANNING, ZONING AND ADJUSTMENT BOARD

At the July 2, 2013 Planning, Zoning and Adjustment Board (PZAB) meeting the applicant requested and the board approved a postponement of both the Variance and Conditional Use petitions with a requirement that new mailings for the August 7, 2013 meeting date be sent to property owners within 500 feet. The applicant has since submitted a letter dated July 25, 2013 for an entitlement postponement from August 7, 2013 to the September 4, 2013 meeting date. However in observation of Rosh Hashanah the September 4, 2013 PZAB meeting was rescheduled to September 9, 2013.

Staff notes the applicant did submit a withdrawal letter for the 140 feet height variance and amended the proposed tower height to 120 feet. Also the applicant/petitioner did submit a separate request appealing staff's interpretation of the required minimum 600 feet separation from residentially zoned property. The appeal was not specifically discussed by the PZAB.

At the September 9, 2013 meeting the PZAB approved the variance request to decrease the required minimum 600 feet separation from a new tower to a residentially zoned property to 482 feet and recommended approval of the Conditional Use with conditions. The PZAB recommended a 120 feet monopole flag pole wireless communication tower with no flag and a total of five (5) carriers; staff to recommend the tower color; and coordinate with the applicant on additional interior and perimeter buffer landscaping to minimize the visual impact of the tower. The landscaping is critical to effectively provide a vertical element at the perimeter of the site.

### IX. COUNCIL

The Conditional Use is scheduled for the November 12, 2013 Council meeting.

# X. STAFF RECOMMENDATION

Based on the findings this request fails to meet six (6) of the nine (9) standards of a Conditional Use as required by Wellington's Land Development Regulations Section 5.4.4.E. Staff recommends denial of Resolution No. 2013-47 (Petition Number 2013-16 CU 1) a Conditional Use to allow a new 120 feet wireless communication tower for the 19.49 acre parcel known as Wellington Marketplace, located on the northeast intersection of Wellington Trace and Greenview Shores Boulevard, as legally described in Exhibit "B."

If Council wishes to consider approval of the Conditional Use request, staff recommends limiting the tower height to meet the coverage needs of the two (2) current providers/users from the proposed Wellington Marketplace location with one of the three (3) above alternatives and the other conditions of Resolution No. 2013-47 to minimize impact.

# List of Exhibits

Exhibit A	Location Map
Exhibit B	Legal Description
Exhibit C	Proposed Site Plan with Tower Compound Plan (Sheet SP 2 and SP 3)
Exhibit D	Verizon Wireless Coverage Maps (Current, 60, 80, 120 and 140 foot height tower)
Exhibit E	AT&T Mobility Coverage Maps (Current, 60, 80, 120 and 140 foot height tower)
Exhibit F	Proposed Monopole Flag Pole Tower
Exhibit G	Applicant Justification for Conditional Use
Exhibit H	Letter Opposing Approval
Exhibit I	Letter Supporting Approval
Exhibit J	Wireless Telecommunications Consultant Report