





**PIMA COUNTY**

DEVELOPMENT SERVICES

**TO:** Honorable Steve Christy, Supervisor, District #4  
**FROM:** Chris Poirier, Planning Official  
Public Works-Development Services Department-Planning Division  
*Edouard Drzegowski*  
**DATE:** August 21, 2020  
**SUBJECT:** P20CU00005 PIMA COUNTY – S. HOUGHTON ROAD  
(Conditional Use – Type III – Communication Tower)

The above referenced Conditional Use Permit is within your district and scheduled for the Board of Supervisors' **TUESDAY, September 15, 2020** hearing.

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**REQUEST:** Conditional Use – Communication Tower

**OWNER:** Pima County

**AGENT:** Steve Olson  
AT&T Mobility  
2601 S. 37<sup>th</sup> St. Suite 200  
Phoenix, AZ 85034

**DISTRICT:** 4

**STAFF CONTACT:** Nick Coussoulis, Senior Planner

**PUBLIC COMMENT TO DATE:** Staff has not received any public comment on this request.

**HEARING ADMINISTRATOR RECOMMENDATION:** APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS.

**PLANNING & ZONING COMMISSION RECOMMENDATION:** APPROVAL (7-0) SUBJECT TO STANDARD AND SPECIAL CONDITIONS.

**MAEVEEN MARIE BEHAN CONSERVATION LANDS SYSTEM (CLS):** The subject property is located outside of the Maeveen Marie Behan Conservation lands System.

TD/NC/ds  
Attachments



**PIMA COUNTY**  
DEVELOPMENT SERVICES

**BOARD OF SUPERVISORS MEMORANDUM**

Subject: P20CU00005

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**FOR SEPTEMBER 15, 2020 MEETING OF THE BOARD OF SUPERVISORS**

TO: HONORABLE BOARD OF SUPERVISORS

FROM: Chris Poirier, Planning Official  
Public Works-Development Services Department-Planning Division

DATE: August 21, 2020

**ADVERTISED ITEM FOR PUBLIC HEARING**

**CONDITIONAL USE PERMIT**

**P20CU00005 PIMA COUNTY – S. HOUGHTON ROAD**

Request of Pima County, represented by AT&T Mobility, located at **11300 S. Houghton Road**, in the RH (AE) (Rural Homestead – Airport Environs) zone for a **Type III Conditional Use Permit for a 100-foot Communication Tower**, in accordance with Section 18.07.030 of the Pima County Zoning Code. Staff and the Hearing Administrator recommend **APPROVAL SUBJECT TO STANDARD AND SPECIAL CONDITIONS**. (District 4)

**Summary of the Planning & Zoning Commission Meeting (July 29, 2020)**

The Planning & Zoning Commission heard staff's and the applicant's presentation as to the particular details of the request. The primary issue raised by Commission members was why Verizon, who operates its own nearby tower, offered cost-prohibitive co-location lease rates to AT&T. The concern here was that, in other future situations, this behavior towards competitors would result in multiple towers in the same location instead of shared verticality. Staff responded that it had limited back-story knowledge as to the particular lease negotiations here, but that co-location was always more feasible when the tower in question was owned by an independent provider, such as Crown or American Tower, instead of being owned by a direct wireless competitor. No members of the public appeared to speak on the matter and the Commission closed the public hearing. Staff had received no public comment, phone calls, or emails on the case. Commissioner Matter made a motion to recommend **APPROVAL** of the Type III Conditional Use Permit request to the Board of Supervisors, subject to standard and special conditions, and the twenty-one (21) criteria as outlined by the Federal Telecommunications Act and as addressed in the Hearing Administrator's separate memorandum of July 10, 2020. Commissioner Membriila gave second to the motion. On a roll call vote, the Commission voted to recommend **APPROVAL** of the Type III Conditional Use Permit Request, subject to standard and special conditions as promulgated by the Hearing Administrator. (7-0, Commissioners Bain, Maese, and Cook were absent).

Standard Conditions (per the Pima County Zoning Code)

1. Adherence to all requirements of Section 18.07.030.H and Section 18.07.040.A.4 (General Regulations and Exceptions) of the Pima County Zoning Code.

Special Conditions

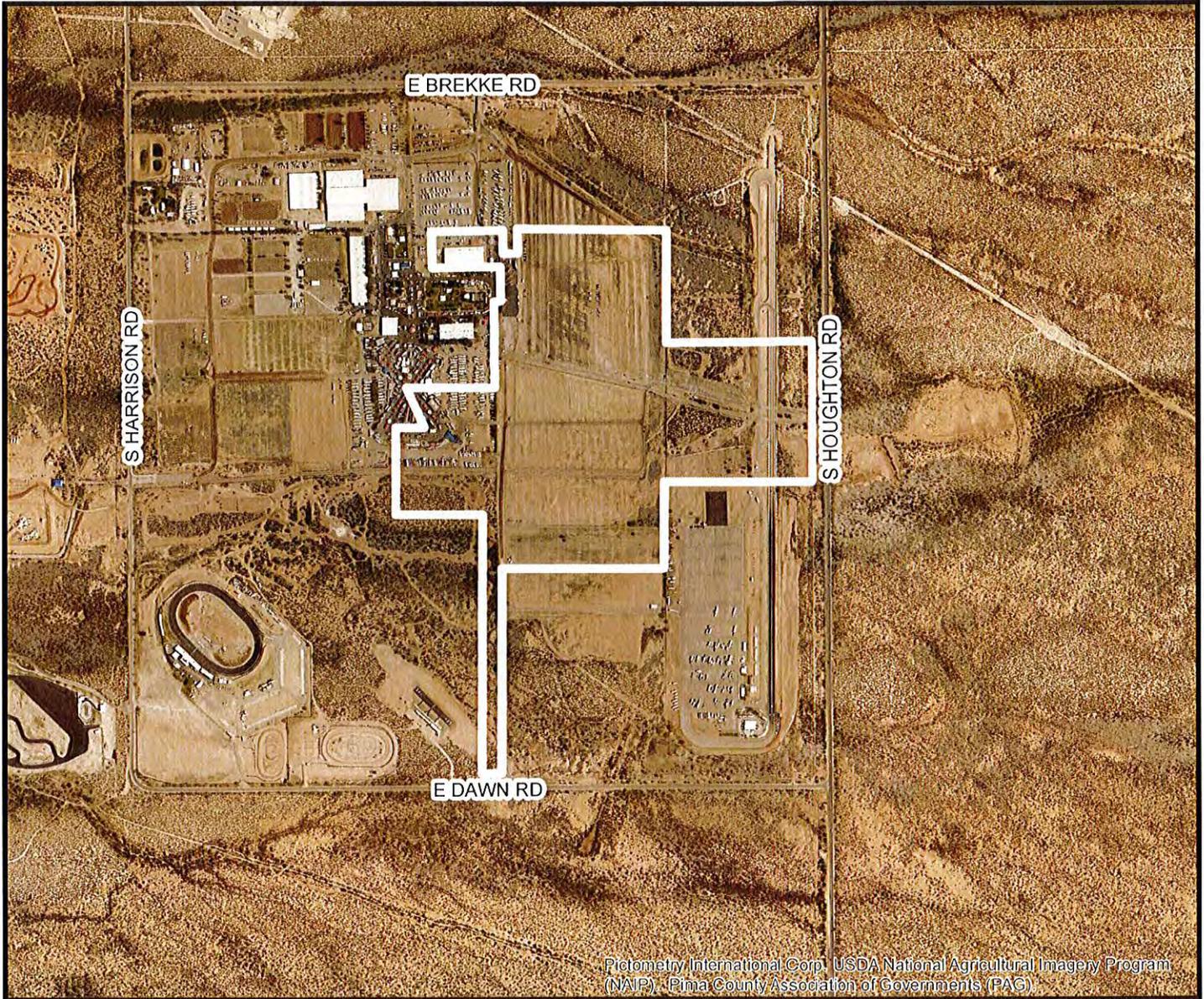
1. The new top height of the monopole tower structure shall not be more than the requested one hundred feet (100').
2. The new monopole tower, antennae, and all associated exterior cabling shall be painted to substantially match the color of the existing nearby Verizon tower.
3. The tower, its antennae array, and its associated on-the-ground equipment area shall be located on the property as shown on the submitted set of construction drawings.

TD/NC/ds  
Attachments

cc: Pima County, Property Owner  
Steve Olson, Applicant, AT&T Mobility  
Tom Drzazgowski, Chief Zoning Inspector Pima County Development Services  
Nick Coussoulis, Senior Planner Pima County Development Services  
P20CU00005 File



P20CU00005 PIMA COUNTY - S. HOUGHTON ROAD  
 Parcel(s): 305-01-004N



0 500 1,000 2,000 Feet

PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT  
 PLANNING DIVISION



Notes: **CONDITIONAL USE PERMIT - TYPE III**



Map Scale: 1:14,000

Map Date: 7/1/2020 - ds



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# MEMORANDUM

## PUBLIC WORKS - DEVELOPMENT SERVICES

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P20CU00005

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### **FOR BOARD OF SUPERVISORS SEPTEMBER 15, 2020 PUBLIC HEARING**

**TO:** THE HONORABLE BOARD OF SUPERVISORS

**FROM:** Jim Portner, Hearing Administrator

**DATE:** July 31, 2020

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**DOCUMENT:** P20CU00005

### **CONDITIONAL USE PERMIT REQUEST FOR PUBLIC HEARING**

Request of Pima County, represented by AT&T Mobility, located at 11300 S. Houghton Road, in the RH-AE (Rural Homestead-Airport Environs) Zone, for a Type III Conditional Use Permit for a 100' Communication Tower, in accordance with Section 18.07.030 of the Pima County Zoning Code. (District 4)

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### **CASE PARTICULARS**

This is a Type III Conditional Use Permit request for a new one hundred foot (100') tall monopole **communications tower** and attendant on-the-ground equipment area for AT&T wireless services. The new antennae panels will be mounted near the top of the tower, with opportunities for co-location being provided at lower heights. The attendant ground equipment will be housed within a secure, chain-link fenced compound. This tower was designed in coordination with the Fairgrounds Commission and with the Pima County IT Department. Potential camouflage as a palm tree was considered, but ultimately rejected due to the height of the tower and the fact that any future co-locations would undermine the faux palm aesthetic.

The proposed tower is located at the Pima County Fairgrounds. It lies just south of the existing RV park that is accessed off of the Brekke Road entrance to the Grounds. It would sit just to the west of the Fairgrounds' Pima Hall and blacksmith shop, and just east of the "Cantina" outdoor gathering area. An existing Verizon cell tower lies in the same vicinity as the proposed, less than one hundred feet (100') away. While this existing 80'+ tall tower was designed for co-location, and while AT&T did seek co-location for its new antennae thereon, the leasing costs tendered by the competing tower owner were prohibitively high. As such, the applicant is pursuing their own stand-alone tower, which will also be designed for co-location by other future carriers.

## **SUMMARY OF THE PLANNING & ZONING COMMISSION PUBLIC HEARING**

The Planning & Zoning Commission hearing on this case took place on July 29, 2020. At same, the Commission heard staff's and the applicant's presentation as to the particular details of the request. The primary issue raised by Commission members was a question as to why Verizon, who operates its own nearby tower, offered cost-prohibitive co-location lease rates to AT&T. The concern here was that, in other future situations, this behavior towards competitors would result in multiple towers in the same location instead of shared verticality. Staff responded that it had limited back-story knowledge as to the particular lease negotiations here, but that co-location was always more feasible when the tower in question was owned by an independent provider, such as Crown or American Tower, instead of being owned by a direct wireless competitor.

No (0) members of the public appeared to speak on the matter. Staff had received no public comment, phone calls, or emails on the case.

**After closing the public hearing, the Commission voted 7-0 (motion by Matter, seconded by Membrila; Commissioners Bain, Maese & Cook being absent) to recommend APPROVAL of this CUP request to the Board of Supervisors, said recommendation being in recognition of the twenty-one (21) criteria as outlined by the Federal Telecommunications Act and as addressed in the Hearing Administrator's separate memorandum of July 10, 2020, and recommending approval to the Board as per the following standard and special conditions as promulgated by the Hearing Administrator:**

### **Standard Conditions (per the Pima County Zoning Code)**

1. Adherence to all requirements of Section 18.07.030.H and Section 18.07.040.A.4 (General Regulations and Exceptions) of the Pima County Zoning Code.

### **Special Conditions**

1. The new top height of the monopole tower structure shall not be more than the requested one hundred feet (100').
2. The new monopole tower, antennae, and all associated exterior cabling shall be painted to substantially match the color of the existing nearby Verizon tower.
3. The tower, its antennae array, and its associated on-the-ground equipment area shall be located on the property as shown on the submitted set of construction drawings.

## **HEARING ADMINISTRATOR'S CONSIDERATIONS**

This request proposes a new one hundred foot (100') tall communications tower and fenced on-the-ground equipment structure. The tower site is within the Pima County Fairgrounds, at the southern edge of the existing RV Park off of Brekke Road. A competitor (Verizon Wireless) already has an existing tower in the same vicinity. The applicant did approach Verizon to pursue co-location of its new antennae, but found the lease terms offered to be prohibitive in cost.

**STAFF REPORT TO THE BOARD OF SUPERVISORS**

P20CU00005 – PIMA COUNTY (COUNTY FAIRGROUNDS PROPERTY) – S. HOUGHTON ROAD

July 31, 2020

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No significant camouflage (such as a faux palm or pine tree) is deemed warranted in this case, given the surrounding context and the fact that there is no camouflage of the existing nearby Verizon tower. The Hearing Administrator believes that painting the new tower and antennae in a manner that substantially matches the existing Verizon tower constitutes reasonable camouflage.

**Wireless Service Coverage and “Gap” Considerations**

The Federal Telecommunications Act of 1996 encourages all new wireless installations that introduce or enhance reliable wireless coverage in those areas where a “gap” in coverage or service-quality presently exists.

The applicant’s submitted propagation plots indicate that the proposed site is currently within an area that is generally characterized by signal levels of -108 to -113 dBm and worse (higher values represent higher noise levels, and therefore poorer signal strengths). With the new tower in place, the immediate surroundings will have a projected signal strength of -90 dBm, together with a more outlying area of -98 dBm. These before and after plots sufficiently demonstrate the presence of an existing coverage gap, and the “filling” of this same gap with the proposed communications tower.

It should also be noted that, in addition to providing AT&T wireless services to the general public, this new tower facility will include service for FirstNet, which is a federal government project that was awarded to AT&T to build a nationwide public safety broadband wireless network for first responders.

**Comprehensive Plan Considerations**

The Comprehensive Plan designates the subject property, and its near surroundings, as *Military Airport (MA)*, the purpose of which is to recognize Davis-Monthan Air Force Base (DMAFB) as a unique and significant factor in shaping the history, character, and economy of Eastern Pima County, provide guidance for future compatible land uses to promote the health, safety and welfare of the community, and to promote the long-term viability of the base and its missions.

The *MA* district declares residential uses as non-compatible with DMAFB operations. It does, however, support nearly all commercial and industrial uses. In the case of this particular site, for example, the nearby existing RV park lies wholly within the *MA* district, as do many of the other buildings and activity areas of the Pima County Fairgrounds. Lastly, an existing communications tower is already in place within the same *MA* district, just a short distance from the proposed.

With all of the above in mind, the Hearing Administrator finds the proposed use to not be in conflict with the stated goals of the Comprehensive Plan nor with its *Military Airport (MA)* designation.

### **Zoning and Land Use Considerations**

The subject parcel is zoned RH (Rural Homestead), as is the entire area surrounding area, all of which constitutes the various functions, buildings and operations of the Pima County Fairgrounds.

### **HEARING ADMINISTRATOR'S RECOMMENDATION TO THE P&Z**

After considering all of the above, reviewing the applicant's submitted materials, and after having visited the subject property, the Hearing Administrator found that the one hundred foot (100') communications tower, with attendant on-the-ground equipment compound, was needed in this area to address an identified gap in coverage. The Hearing Administrator therefore recommended that the Commission recommend **APPROVAL** of this Type III conditional use permit to the Board of Supervisors, subject to the following Standard and Special Conditions:

#### **Standard Conditions (per the Pima County Zoning Code)**

1. Adherence to all requirements of Section 18.07.030.H and Section 18.07.040.A.4 (General Regulations and Exceptions) of the Pima County Zoning Code.

#### **Special Conditions**

1. The new top height of the monopole tower structure shall not be more than the requested one hundred feet (100').
2. The new monopole tower, antennae, and all associated exterior cabling shall be painted to substantially match the color of the existing nearby Verizon tower.
3. The tower, its antennae array, and its associated on-the-ground equipment area shall be located on the property as shown on the submitted set of construction drawings.

### **SONORAN DESERT CONSERVATION CONCEPT PLAN/ENVIRONMENTAL ISSUES**

#### **Comprehensive Plan Regional Environmental Policies — Conservation Lands System**

In December, 2001 the Board of Supervisors incorporated the Maeveen Marie Behan Conservation Lands System (MMB-CLS) into the Comprehensive Plan 2001 Update as the Regional Environmental Policies. The MMB-CLS is the heart of the Sonoran Desert Conservation Plan (SDCP). On June 21, 2005, the Board of Supervisors amended the Comprehensive Plan Regional Environmental Policies and the MMB-CLS to reflect recommendations from the SDCP Science Technical Advisory Committee that were based on new scientific and technical data. As adopted, Conservation Guidelines associated with the MMB-CLS establish conservation objectives for a variety of projects (e.g. rezoning actions, comprehensive plan amendments, Type II and Type III conditional use permits, etc.) that require a discretionary decision by the Board of Supervisors. Conservation objectives include:

**STAFF REPORT TO THE BOARD OF SUPERVISORS**

P20CU00005 – PIMA COUNTY (COUNTY FAIRGROUNDS PROPERTY) – S. HOUGHTON ROAD

July 31, 2020

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- Important Riparian Areas — 95% undisturbed natural open space
- Biological Core Management Areas — 80% undisturbed natural open space
- Special Species Management Areas — 80% undisturbed natural open space
- Multiple Use Management Areas — 66-2/3% undisturbed natural open space

The subject property is located **OUTSIDE OF** the Maeveen Marie Behan Conservation Lands System (MMB-CLS).

**Biological Impacts Report**

On July 17, 2001, the Board of Supervisors adopted Ordinance No. 2001-103, which requires the applicant's notice to the US Fish and Wildlife Service (USFWS) staff regarding the pending matter, and staff commentary on biological resources and development impacts of the subject site and proposal.

**Staff Commentary on Biological Impacts**

As indicated above, the property lies **OUTSIDE OF** the Conservation Lands System. This particular tower is located in an area that is already wholly impacted by past construction and development activity and cleared of native vegetation. No new material impact upon any habitat or vegetative resources will occur and this new tower will not negatively affect any adopted Pima County environmental policies.

**Facts Confirmed by the Pima County Geographic Information System (GIS)**

The following facts are confirmed by the Pima County GIS and the Sonoran Desert Conservation Plan maps with respect to this conditional use permit request:

**Cactus Ferruginous Pygmy Owl.** The subject property is not located within an area that is designated as Former Critical Habitat, nor Draft Recovery Area. This site is not located within a Priority Conservation Area (PCA) for this species.

**Western Burrowing Owl.** The subject property is not within the Priority Conservation Area (PCA) for this species.

**Pima Pineapple Cactus.** The subject property is located within an area that is within the Priority Conservation Area (PCA) for this species. Please note that the proposed site has already been entirely cleared of native vegetation.

**Needle-Spined Pineapple Cactus.** The subject property is located within an area that is outside of the known range for the Needle-Spined Pineapple cactus. It is not within the Priority Conservation Area (PCA) for this species.

**RECOMMENDATIONS BY THE DEPT. OF TRANSPORTATION AND THE  
REGIONAL FLOOD CONTROL DISTRICT**

The Department of Transportation (DOT) and the Regional Flood Control District (RFCD) will review this project as need be during the final permitting process.

attachments

cc: Carla Blackwell, Director, Development Services  
Dan Ice, Chief Building Official  
Chris Poirier, Planning Official  
Tom Drzazgowski, Chief Zoning Inspector  
Pima County (Pima County Fairgrounds), Property Owner  
Steve Olson, AT&T Mobility/Bechtel Communications, applicant

**PIMA COUNTY DEVELOPMENT SERVICES REPORT TO THE  
PIMA COUNTY PLANNING & ZONING COMMISSION**

**CASE:**                   **P20CU00005**  
**PIMA COUNTY – S. HOUGHTON ROAD**

**OWNERSHIP:**           Pima County (Pima County Fairgrounds)  
33 N. Stone Avenue – 14<sup>th</sup> Floor  
Tucson, AZ 85701

**APPLICANT:**           AT&T Mobility/Bechtel Communications  
c/o Mr. Steve Olson  
2601 S. 37th Street, Suite 200  
Phoenix, AZ 85034

**LOCATION:**               The proposed tower is located at the Pima County Fairgrounds. It lies just south of the existing RV park that is accessed off of the Brekke Road entrance to the Grounds. It would sit just to the west of the Fairgrounds' Pima Hall and blacksmith shop, and just east of the "Cantina" outdoor gathering area. An existing Verizon cell tower lies in the same vicinity as the proposed, less than one hundred feet (100') away. While this existing 80'+ tall tower was designed for co-location, and while AT&T did seek co-location for its new antennae thereon, the leasing costs tendered by the competing tower owner were prohibitively high. As such, the applicant is pursuing their own stand-alone tower, which will also be designed for co-location by other future carriers.

**REQUEST:**               This is a Type III Conditional Use Permit request for a new one hundred foot (100') tall monopole **communications tower** and attendant on-the-ground equipment area for AT&T wireless services. The new antennae panels will be mounted near the top of the tower, with opportunities for co-location being provided at lower heights. The attendant ground equipment will be housed within a secure, chain-link fenced compound. This tower was designed in coordination with the Fairgrounds Commission and with the Pima County IT Department. Potential camouflage as a palm tree was considered, but ultimately rejected due to the height of the tower and the fact that any future co-locations would undermine the faux palm aesthetic.

**PETITIONER'S STATEMENT REGARDING THE TYPE OF USE PROPOSED**

"Install new 100' monopole wireless facility."

**PETITIONER'S STATEMENT REGARDING NEED AND COMPATIBILITY**

"The proposed facility is centrally located on the fairgrounds adjacent to the RV parking area. The height and footprint of the proposed facility is similar to a nearby facility owned by Verizon."

The petitioner has provided a complete submittal package that includes a project narrative, together with various supporting materials, coverage/propagation plots, photo simulations, and a set of construction drawings.

### **HEARING ADMINISTRATOR'S CONSIDERATIONS**

This request proposes a new one hundred foot (100') tall communications tower and fenced on-the-ground equipment structure. The tower site is within the Pima County Fairgrounds, at the southern edge of the existing RV Park off of Brekke Road. A competitor (Verizon Wireless) already has an existing tower in the same vicinity. The applicant did approach Verizon to pursue co-location of its new antennae, but found the lease terms offered to be prohibitive in cost.

No significant camouflage (such as a faux palm or pine tree) is deemed warranted in this case, given the surrounding context and the fact that there is no camouflage of the existing nearby Verizon tower. The Hearing Administrator believes that painting the new tower and antennae in a manner that substantially matches the existing Verizon tower constitutes reasonable camouflage.

### **Wireless Service Coverage and "Gap" Considerations**

The Federal Telecommunications Act of 1996 encourages all new wireless installations that introduce or enhance reliable wireless coverage in those areas where a "gap" in coverage or service-quality presently exists. The US Forest Service supports these objectives.

The applicant's submitted propagation plots indicate that the proposed site is currently within an area that is generally characterized by signal levels of -108 to -113 dBm and worse (higher values represent higher noise levels, and therefore poorer signal strengths). With the new tower in place, the immediate surroundings will have a projected signal strength of -90 dBm, together with a more outlying area of -98 dBm. These before and after plots sufficiently demonstrate the presence of an existing coverage gap, and the "filling" of this same gap with the proposed communications tower.

It should also be noted that, in addition to providing AT&T wireless services to the general public, this new tower facility will include service for FirstNet, which is a federal government project that was awarded to AT&T to build a nationwide public safety broadband wireless network for first responders.

### **Comprehensive Plan Considerations**

The Comprehensive Plan designates the subject property, and its near surroundings, as *Military Airport (MA)*, the purpose of which is to recognize Davis-Monthan Air Force Base (DMAFB) as a unique and significant factor in shaping the history, character, and economy of Eastern Pima County, provide guidance for future compatible land uses to promote the health, safety and welfare of the community, and to promote the long-term viability of the base and its missions.

The *MA* district declares residential uses as non-compatible with DMAFB operations. It does, however, support nearly all commercial and industrial uses. In the case of this particular site, for example, the nearby existing RV park lies wholly within the *MA* district, as do many of the other buildings and activity areas of the Pima County Fairgrounds. Lastly, an existing communications tower is already in place a within the same *MA* district, just a short distance from the proposed.

With all of the above in mind, the Hearing Administrator finds the proposed use to not be in conflict with the stated goals of the Comprehensive Plan nor with its *Military Airport (MA)* designation.

### **Zoning and Land Use Considerations**

The subject parcel is zoned RH (Rural Homestead), as is the entire area surrounding area, all of which constitutes the various functions, buildings and operations of the Pima County Fairgrounds.

### **HEARING ADMINISTRATOR'S RECOMMENDATION**

After considering all of the above and reviewing the applicant's submitted materials, the Hearing Administrator finds that the one hundred foot (100') communications tower, with attendant on-the-ground equipment compound, is needed in this area to address an identified gap in coverage. The Hearing Administrator recommends that the Commission recommend **APPROVAL** of this Type III conditional use permit to the Board of Supervisors, subject to the following Standard and Special Conditions:

#### **Standard Conditions (per the Pima County Zoning Code)**

1. Adherence to all requirements of Section 18.07.030.H and Section 18.07.040.A.4 (General Regulations and Exceptions) of the Pima County Zoning Code.

#### **Special Conditions**

1. The new top height of the monopole tower structure shall not be more than the requested one hundred feet (100').
2. The new monopole tower, antennae, and all associated exterior cabling shall be painted to substantially match the color of the existing nearby Verizon tower.
3. The tower, its antennae array, and its associated on-the-ground equipment area shall be located on the property as shown on the submitted set of construction drawings.

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Environmental Policies. The MMB-CLS is the heart of the Sonoran Desert Conservation Plan (SDCP). On June 21, 2005, the Board of Supervisors amended the Comprehensive Plan Regional Environmental Policies and the MMB-CLS to reflect recommendations from the SDCP Science Technical Advisory Committee that were based on new scientific and technical data. As adopted, Conservation Guidelines associated with the MMB-CLS establish conservation objectives for a variety of projects (e.g. rezoning actions, comprehensive plan amendments, Type II and Type III conditional use permits, etc.) that require a discretionary decision by the Board of Supervisors. Conservation objectives include:

- Important Riparian Areas — 95% undisturbed natural open space
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### **Biological Impacts Report**

On July 17, 2001, the Board of Supervisors adopted Ordinance No. 2001-103, which requires the applicant's notice to the US Fish and Wildlife Service (USFWS) staff regarding the pending matter, and staff commentary on biological resources and development impacts of the subject site and proposal.

### **Staff Commentary on Biological Impacts**

As indicated above, the property lies **OUTSIDE OF** the Conservation Lands System. This particular tower is located in an area that is already wholly impacted by past construction and development activity and cleared of native vegetation. No new material impact upon any habitat or vegetative resources will occur and this new tower will not negatively affect any adopted Pima County environmental policies.

### **Facts Confirmed by the Pima County Geographic Information System (GIS)**

The following facts are confirmed by the Pima County GIS and the Sonoran Desert Conservation Plan maps with respect to this conditional use permit request:

**Cactus Ferruginous Pygmy Owl.** The subject property is not located within an area that is designated as Former Critical Habitat, nor Draft Recovery Area. This site is not located within a Priority Conservation Area (PCA) for this species.

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**RECOMMENDATIONS BY THE DEPT. OF TRANSPORTATION AND THE REGIONAL FLOOD CONTROL DISTRICT**

The Department of Transportation (DOT) and the Regional Flood Control District (RFCD) will review this project as need be during the final permitting process.

attachments

cc: Carla Blackwell, Director, Development Services  
Dan Ice, Chief Building Official  
Chris Poirier, Planning Official  
Tom Drzazgowski, Chief Zoning Inspector  
Pima County (Pima County Fairgrounds), Property Owner  
Steve Olson, AT&T Mobility/Bechtel Communications, applicant



**PIMA COUNTY  
DEVELOPMENT SERVICES DEPARTMENT**

201 N. Stone Avenue, 1st Floor  
Tucson, Arizona 85701-1207

**CARLA BLACKWELL**  
Director

Phone: (520) 740-6520  
FAX: (520) 798-1843

## **MEMORANDUM**

**TO:** Members of the Pima County Planning & Zoning Commission

**FROM:** Jim Portner, Pima County Hearing Administrator

**SUBJECT:** **P20CU00005 – PIMA COUNTY (PIMA COUNTY FAIRGROUNDS) – S. HOUGHTON ROAD; Type III Conditional Use Permit Request for a One Hundred Foot (100') Tall Monopole Communications Tower**

**DATE:** July 10, 2020

This memorandum is intended to assist the members of the Planning & Zoning Commission in its evaluation of the above-referenced Type III request for a new communications tower. Per the Federal Telecommunications Act of 1996, twenty-one (21) criteria were established which can be considered by the local zoning authority in its decision to approve or deny such requests.

These twenty-one criteria are listed below (in *italics*), with a brief commentary on each for the Commission's consideration:

1. *Amount of compliance with permit requirements.* A Type III CUP is required because this is a request for a new, free-standing communications tower that exceeds fifty feet (50').
2. *Staff approval or disapproval.* Not applicable; the Type III CUP process calls for a recommendation by the Hearing Administrator to the P&Z, then a recommendation by the P&Z to the Board of Supervisors, and then a final decision of approval or denial by the Board. The Hearing Administrator's recommendation has been provided via a separate staff report memorandum to the Planning & Zoning Commission.
3. *Zoning approval or disapproval.* Not applicable; same comment as Item 2 above. This site is zoned RH (Rural Homestead), as are the entire surrounding County Fairgrounds.

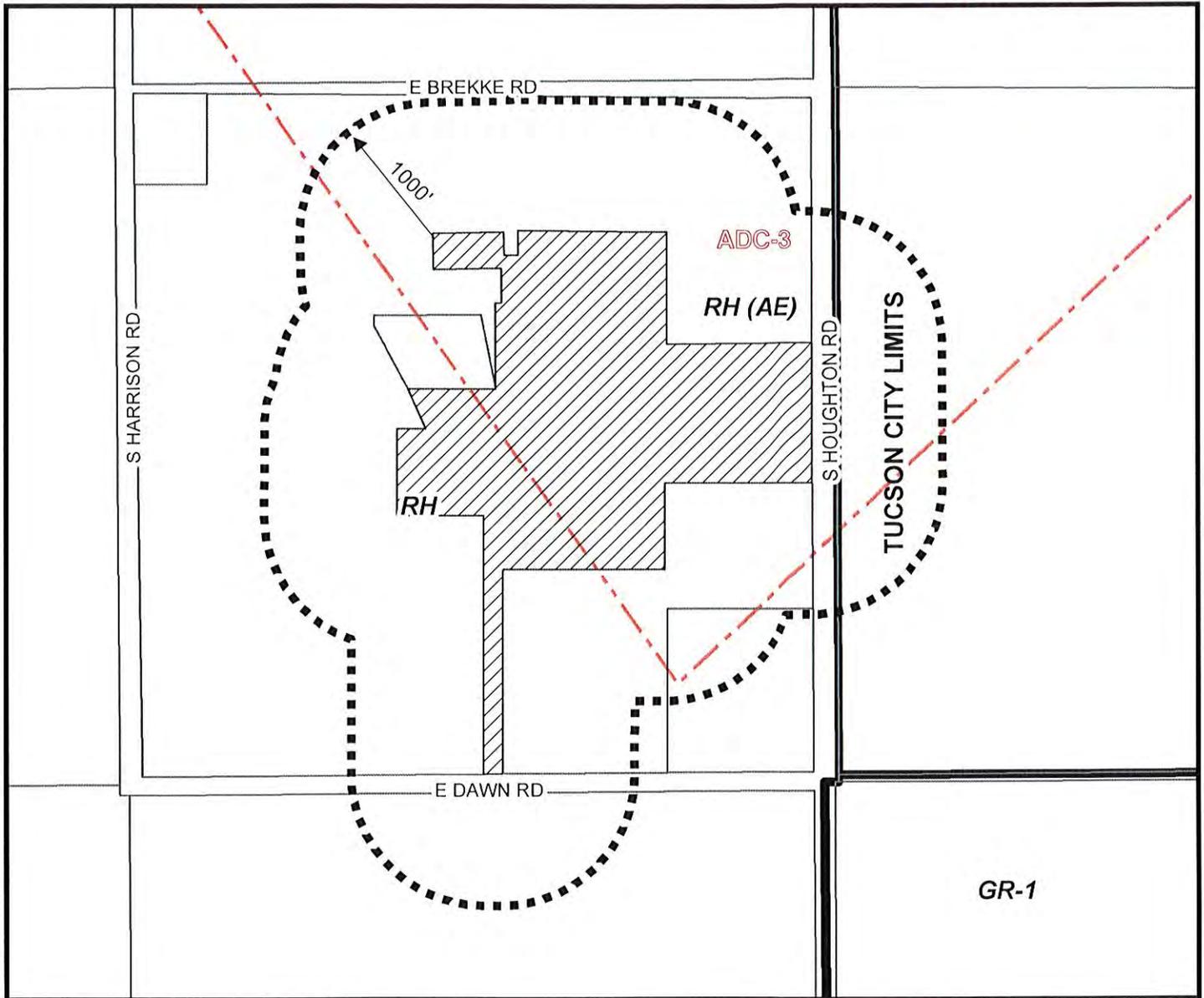
4. *Other towers in the same zoning classification.* Numerous prior towers have been approved in the RH (Rural Homestead) zoning district.
5. *Other towers in other zoning classifications.* Pima County has previously approved towers in the SH, GR-1, RH, SR, CR-1, and CR-4 residential zones, in the CB-1 and CB-2 business zones, and in the CPI industrial zone.
6. *Amount of neighborhood opposition and whether it is substantial and supported by factual evidence.* Staff has received no letters, emails, etc. of opposition as of the writing of this memorandum. The applicant has worked closely with the Fairgrounds Commission and the Pima County IT Department.
7. *Type of neighborhood opposition.* None to date. See Item #6 above.
8. *Nature of neighborhood opposition, whether aesthetic, etc.* Not applicable; see Item #6 above.
9. *Amount, type, and nature of evidence offered by wireless provider.* Contained within application packet; additional information may be sought by the Commission at hearing.
10. *Expert testimony.* None to date.
11. *Height of tower.* The height of the proposed monopole tower is one hundred feet (100') to the highest point of its steel monopole structure.
12. *Color of tower.* The Hearing Administrator's special conditions mandate that the tower and all associated paraphernalia be painted a color that substantially matches that of the existing nearby Verizon communications tower.
13. *Possibilities of camouflage.* See applicant "Supplemental Information" write-up Item #3. The applicant had originally considered a faux palm tree, but this was ultimately rejected due to the substantial height of the tower, together with the fact that any future co-locations would undermine the aesthetic of the faux palm. The Hearing Administrator concurs with this decision and offers the alternative camouflage found in Item #12 above.
14. *Service coverage issues; such as whether a gap would be created that would impede emergency service.* See applicant "Supplemental Information" write-up Item #4, the applicant's existing/proposed coverage maps, and the Hearing Administrator's staff report, wherein the existing and proposed coverage characteristics are discussed. The aforementioned materials establish that a gap in coverage does presently exist. It should also be noted that, addition to providing AT&T wireless services to the general public, the facility will include service for FirstNet, a federal government project awarded to AT&T to construct a nationwide public safety broadband wireless network for first responders.

15. *Alternative sites explored.* See applicant's "Supplemental Information" write-up Item #5, as well as the Hearing Administrator's staff report. The applicant indicates that they did pursue Verizon Wireless for co-location on its existing nearby tower, but that the lease terms offered by this competitor were cost prohibitive.
16. *Possibilities for co-location on an existing tower.* See applicant "Supplemental Information" write-up Item #6. Also see Item #15 immediately above.
17. *Possibilities for more, shorter towers.* See applicant "Supplemental Information" write-up Item #7, wherein it is stated that the coverage needs of this particular area drive the appropriateness of the single 100' tower being proposed.
18. *Provision for tower removal.* See applicant "Supplemental Information" write-up Item #8, wherein it is stated that the applicable County lease terms require tower removal, at no cost to Pima County, within 90 days of the lease being terminated or expiring.
19. *Possibilities for this tower serving as a co-location site for other providers.* See applicant "Supplemental Information" write-up Item #9. The proposed tower is structurally designed to accommodate co-location by other additional/future wireless carriers.
20. *Time taken to make the decision (by the local zoning authority).* This item is before the Commission for the first time at its July 29, 2020 public hearing. Federal law encourages a timely response by the local zoning authority. It is recommended that the Commission vote on their formal recommendation to the Board of Supervisors at the July 29, 2020 meeting.
21. *Government contracts with the wireless provider.* See applicant "Supplemental Information" write-up Item #10, wherein the applicant states they have contracts with many governmental entities and will also further the federally-mandated FirstNet network for first-responders (also see Item 14 above).

**P20CU00005 PIMA COUNTY - S. HOUGHTON ROAD**  
**Parcel(s): 305-01-004N**

**Legend**

-  1000' Notification Area
-  Subject Property
-  Zoning Boundary
-  AE Height Overlay Zone



**PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT**  
**PLANNING DIVISION**

Notes: **CONDITIONAL USE PERMIT - TYPE III**



Map Scale: 1:14,000

Map Date: 7/1/2020 - ds









1355 W. UNIVERSITY DRIVE  
 MESA, AZ 85201-5419

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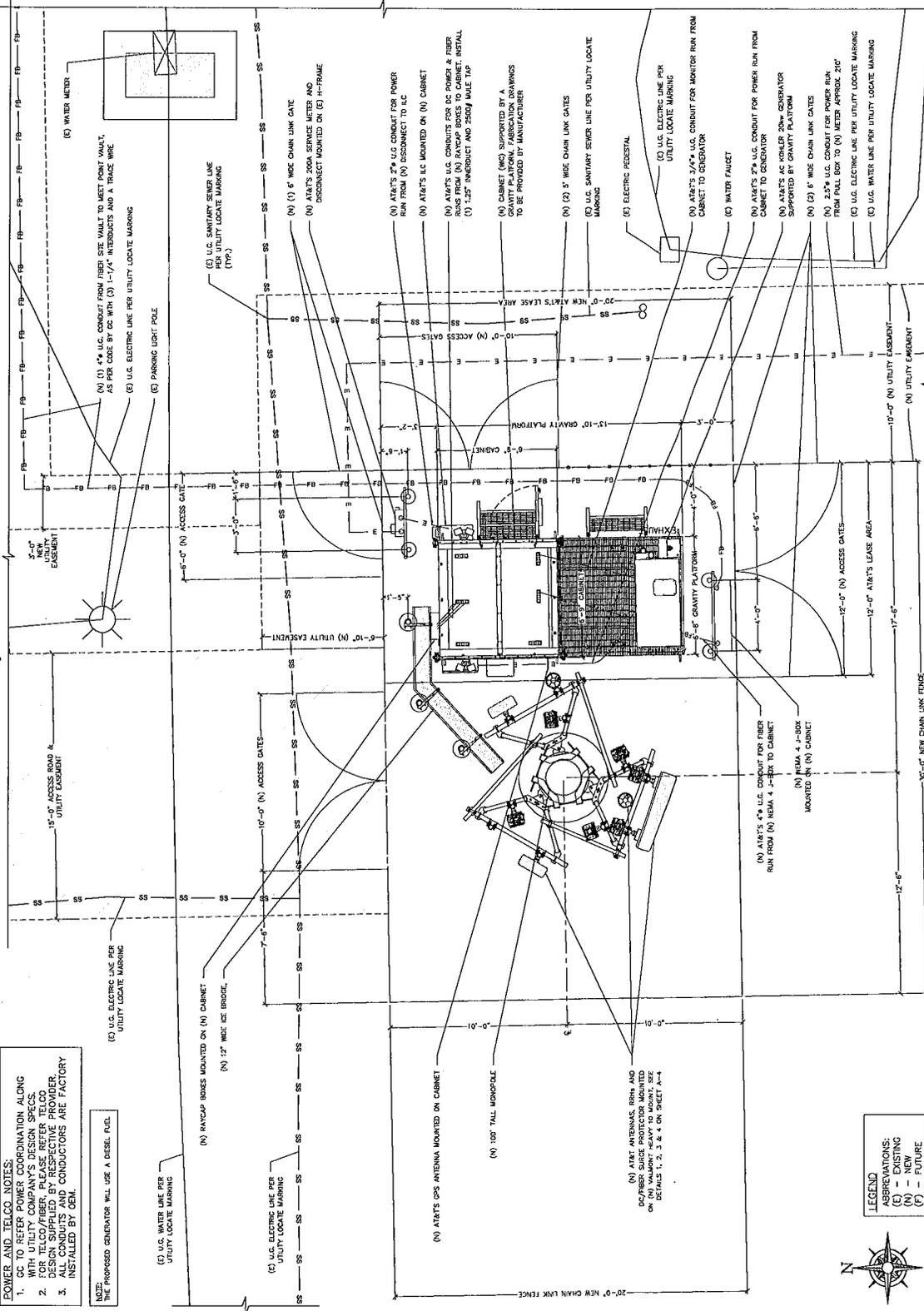


PROJECT: CO-LOCATION  
 SITE NO.: AZL02580  
 SITE NAME: PINA COUNTY  
 FAIRGROUNDS  
 FA CODE: 14871698  
 USID: 248905

11300 S. HOUGHTON ROAD  
 TUCSON, AZ 85747  
 PINA COUNTY

DATE	DESCRIPTION	BY	CHK
05/20/20	FINAL 2D	JR	SAH
04/09/20	FINAL DRAWINGS	JR	SAH

PROFESSIONAL SEAL	
SHEET TITLE	
NEW ENLARGED SITE PLAN	
SHEET NUMBER	
A-3	



**POWER AND TELCO NOTES:**

1. GC TO REFER POWER COORDINATION ALONG WITH UTILITY COMPANY'S DESIGN SPECS.
2. ALL CONDUITS AND CONDUCTORS ARE FACTORY DESIGN SUPPLIED BY RESPECTIVE PROVIDER.
3. ALL CONDUITS AND CONDUCTORS ARE FACTORY INSTALLED BY OEM.

**NOTES:**  
 THE PROPOSED GENERATOR WILL USE A DIESEL FUEL.

**LEGEND:**  
 ABBREVIATIONS:  
 (E) - EXISTING  
 (N) - NEW  
 (F) - FUTURE



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PROJECT INFORMATION

SITE NO: AZL02580  
SITE NAME: PIMA COUNTY  
FAIRGROUNDS

9920 E BREKKE RD.  
TUCSON, AZ 85747

PROJECT OWNER



at&t

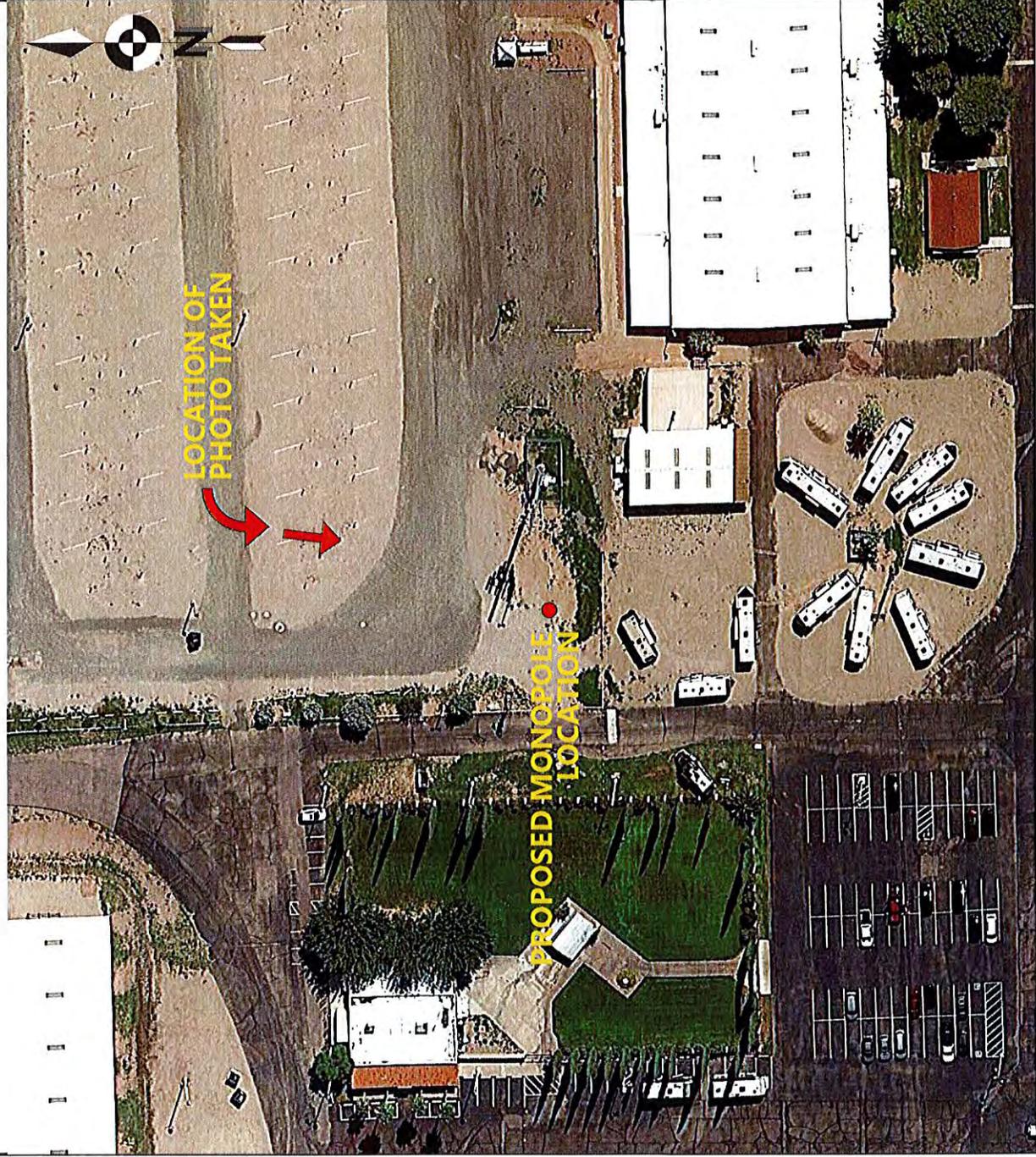
SITE DEVELOPMENT



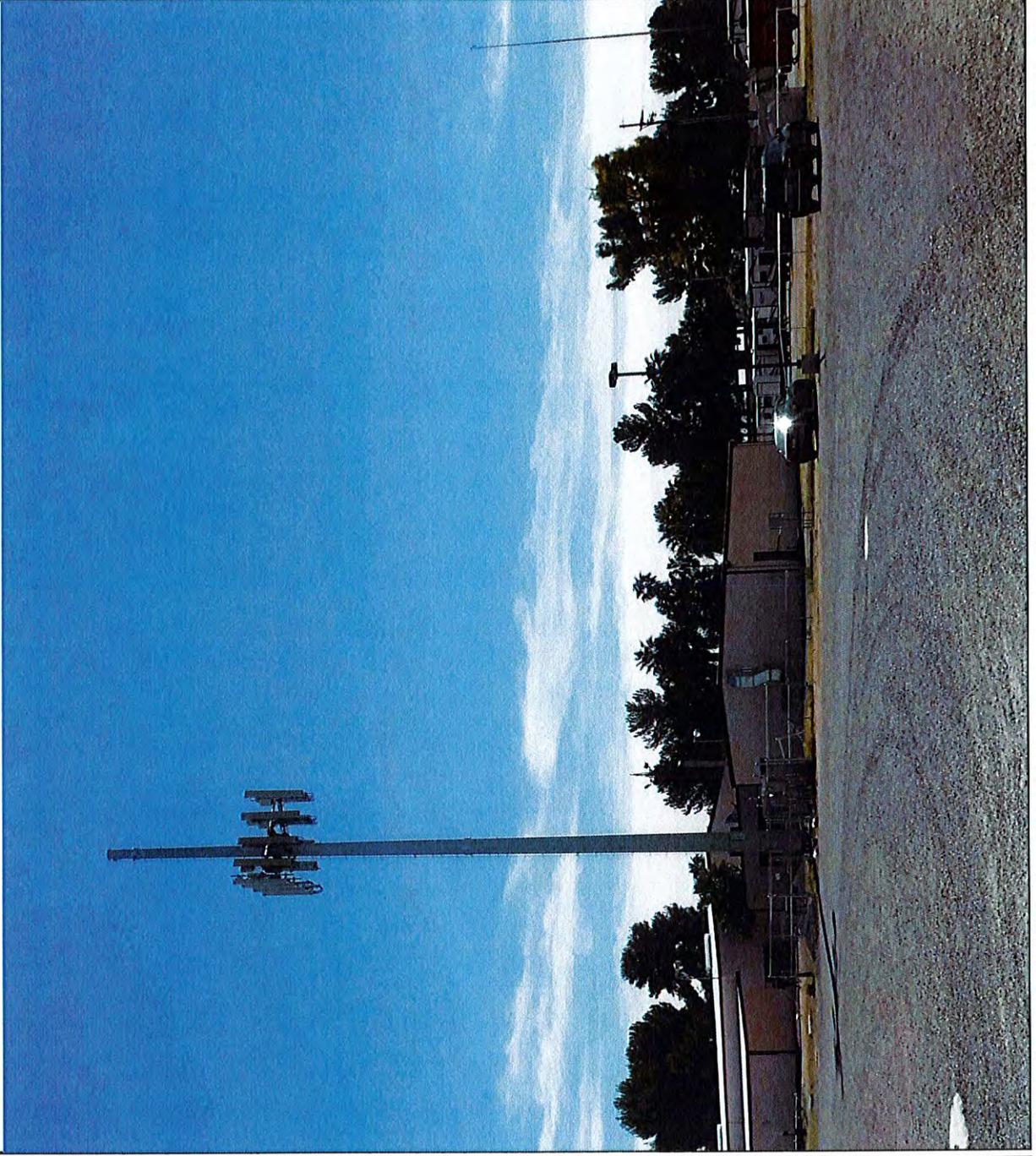
PREPARED BY



LOCATION MAP



Looking South Toward  
Tower Location (Before)



**PROJECT INFORMATION**

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TUCSON, AZ 85747

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**at&t**

**SITE DEVELOPMENT**



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**SITE DEVELOPMENT**



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Looking South Toward  
Tower Location (After)

