



Alachua County – Growth Management
Attention: Development Services Division
10 SW 2nd Avenue
Gainesville, FL 32601

RE: Special Use Application to allow for the construction and use of a 265-foot Lattice Personal Wireless Service Facility.

Applicant: NexTower Development Group II, LLC.
13577 NW 2nd Lane, Suite 20
Newberry, FL 32669

Land Owner: Rayonier Forest Resources, LP
1 Rayonier Way
Wildlight, FL 32097

Contacts: Dave Boeff or Joel Rousseau
Ph: 352-363-5560
dboeff@nexttower.net; jrousseau@nexttower.net

Agent: Holtzman Vogel Baran Torchinsky & Josefiak PLLC
Gary Hunter
Ghunter@HoltzmanVogel.com

Alachua County Growth Management:

Enclosed please find NexTower Development Group II, LLC (“NexTower”) application for Special Use Approval to construct a 265-foot Lattice Personal Wireless Services Facility (PWSF). The following documents are included pursuant to the Alachua County Land Development code and Special Use Application requirements.

- Zoning Application for Special Use
- Project Summary
- PWSF Checklist
- Owners Affidavits
- Fee Simple Property Card and Tax Receipts
- FCC Antenna Registration (*Pending Completion of NEPA*)
- FAA Determination of No Hazard
- Site Plans
- Boundary Survey
- Legal Descriptions
- 1-A Certification
- Existing Towers Map
- Existing Airport Map
- Airport Protection Overlay Map
- Tower Design + Future Carrier Loading
- Visual Impact Analysis -Photo simulation & LOS
- T-Mobile – Co-applicant Statement, T-Mobile – RF Anchor Support Letter
- T-Mobile – RFDS Equipment list, T-Mobile – First Tier Handoff Sites & Map
- Environmental Resource Checklist
- Neighborhood Workshop Package (Proof of Publication)

Project Summary: ULDC and Comprehensive Plan

Pursuant to section 404.54 (c) of the Alachua County Land Development Code, applications to construct a Lattice-type Personal Wireless Services Facility (“PWSF”) shall be assigned a Special Use Permit Tier III process.

The applicant, NexTower Development Group II, LLC. (“NexTower”) is seeking a Special Use Permit to construct a 265-foot self-supporting tower PWSF on a 197-acre parcel in Alachua County, Florida. More specifically, the project is located within Section 2, Township 8 South, Range 20 East within a portion of Rayonier Forest Resources Tax Parcel 07605-000-000 (“The Property”). The property is currently undeveloped, utilized for planted pines-silviculture and provides the applicant adequate PWSF ground space, connection to utilities and access to county road 225 public right-of-way. The property is in the Rural/ Agriculture Future Land Use designation and Agricultural Zoning Category. The PWSF lease premises is approximately 0.23 acres, in addition to any required easements for access and utilities from county road 225. The property contains an existing driveway apron and stabilized access road utilized for silviculture purposes which minimizes additional impact to the public right-of-way and property.

This Special Use Application is sought in conjunction with T-Mobile for the purpose of improving network services to the area of north county road 225 and east county road 225 (Monteocha) area. The proposed PWSF will allow T-Mobile and future wireless tenants to meet current and future demands for network services while significantly improving coverage along county road 225. The PWSF tower shall be designed to accommodate four (4) commercial wireless providers (T-Mobile, AT&T, Verizon & Dish Wireless). The PWSF tower & equipment will be enclosed by security fencing with PVT Slats providing 80% opacity. Due to the abundance of existing foliage and planted pines surrounding the tower lease premises, applicant requests waiver from landscape requirements and supplemental irrigation. The PWSF tower is located outside of the Airport Impact Overlay boundary however will require Navigational Hazard Lighting per FAA determination 2023-ASO-20629-OE. The PWSF tower will contain no habitable structures, does not require potable water, sanitary sewer or create solid waste, therefore has no impact on public facilities.

Based on NexTowers research it does not appear that adverse visual impacts, environmental impacts, stormwater impacts, or historical impacts will occur as a result of the construction and operation of the proposed PWSF at this location. The below responses to Section 404.54 demonstrate compliance with the standards of ULDC and therefore Comprehensive Plan.

Article XII: Personal Wireless Service Facilities:

Section 404.54-Tiered permit process and standards:

(c) Tier three. Those applications not consistent with tier one or tier two standards shall be reviewed as special use permits, as found in Chapter 402, Article XVIII, Special Use Permits. Tier three reviews are subject to the following review criteria:

- The applicant is proposing a 265’ Lattice-type PWSF (255-ft Self-Support Tower + 10-ft Appurtenance) therefore shall require a Tier III Review.

(1) Location.

a. The proposed PWSF shall be located in an area where the adverse visual impact on the community is minimized, as demonstrated by the visual impact analysis report described in Subsection [404.56\(c\)](#).

- The proposed PWSF is located within a portion of a 197-acre parcel utilized for silviculture and owned by Rayonier Forestry Resources. The parent parcel is comprised of planted pines with portion of land last harvested in 2020. Life expectancy of pines ranges from 10-12 year to initial thinning and 18-20



years to cycle harvest. In addition, Rayonier owns abutting parcels to the south and southwest comprised of planted pines. A Visual impact analysis was conducted along north and east county road 225 and is included as part of this submittal package. Based on NexTower's findings it does not appear that adverse visual impacts will occur as a result of the construction and operation of a proposed PWSF at this location.

b. The location of a proposed PWSF shall minimize environmental impacts. Ground-mounted PWSF should not be located in preservation areas, conservation areas, or passive recreation areas of County parks as defined by this ULDC and the Comprehensive Plan.

- The proposed PWSF is not located in lands classified as recreation, conservation, or preservation. Wetlands are located within the parent parcel however there is no impact to wetlands as a result of the proposed tower or access. On-site recognition by Terracon Environmental and Alachua County Environmental Department confirms the proposed tower location is outside of protected natural resource area, as illustrated in the attached Survey map and the Environmental Resource Checklist.

c. PWSFs greater than two hundred (200) feet in height should not be located in areas where the increased potential for bird kills is shown to exist.

- As per Terracon Environmental opinion the proposed tower will have no detrimental impact on migratory birds or cause an increase in potential bird kills. Terracon and the applicant have reviewed the U.S. Fish and Wildlife Service's Revised Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommission (2021). Though the tower design cannot conform to all of the recommendations, the applicant has minimized tower height to the greatest extent, eliminated the need for guy wires, and will utilize a lighting style that eliminates the need for red steady-burning lighting. There is no indication that the proposed tower location is in an area of higher concentration of migrating birds.

d. Lighted towers using guywires are prohibited in conservation areas as defined by this ULDC and the Comprehensive Plan.

No guy wires are associated with this development. Per FAA Aeronautical Study 2023-ASO-20629-OE the proposed tower structure will require navigational hazard lighting.

e. Proposed PWSFs should not be visible from any designated scenic road or corridor, or roads designated Old Florida Heritage Highway.

- There are no designated scenic roads or Old Florida Heritage highways in close proximity to the proposed PWSF location. The proposed facility is located off north county road 225 (Racetrack Road).

(2) Design. All PWSFs should be designed in such a way to minimize the adverse visual impact on the community. This may include reducing the height and silhouette in order to create the least adverse visual impact. The minimum height necessary to provide the applicant carrier's designed service to the area should be utilized, as verified by an independent radio frequency (RF) analysis. In general, a monopole tower or concealed tower is considered to have less visual impact than alternative tower designs.

- The applicant is proposing a 255-foot Lattice-Type (Self Support) tower with 10' appurtenance (265-foot total height), the minimum height necessary to accomplish T-Mobile's coverage objectives and provides adequate available heights for future tenants.

(d) Development standards for tier two and tier three. All applications for tier two or tier three review shall comply with the following standards:

(1) Setbacks and separation. All new towers and accessory structures shall comply with standard zoning district setbacks for a primary structure or other setbacks described in this Article, whichever is greater. All non-concealed PWSFs shall be located behind the principal building line. If the PWSF is mounted on a building, it shall not be visible from the front of the building at the pedestrian level.

- The Proposed PWSF complies with County setback and separations requirements and exceeds the standard zoning district building setbacks. The proposed center of tower is setback from property lines as follows.

Center of tower to property line setbacks:

North Line (CR225):	350.0 ft.
East Line:	1,760 ft.
South Line:	3,010 ft.
West Line:	747 ft.

(2) Security barrier. All ground mounted equipment for PWSF facilities shall be secured with locked gate and chain-link fence or masonry wall of at least six (6) feet in height from finished grade. The security barrier shall be maintained by the operator of the PWSF or tower for the life of the installation.

- The Proposed PWSF shall be enclosed by a 6-foot chain-link fence with overhead security and Stymie Lock (multi-access lock). Green PVT slats are proposed to be installed within the fence to maintain 80% opacity visual screening. Please refer to attached Site Plan, Page C-2 for security fencing details.

(3) Airport impacts. All PWSFs must comply with Alachua County Airport Impact Regulations found in Article VII of Chapter 405.

- The Proposed PWSF complies with Article VII, Section 405.25 Alachua County Airport Impact regulations. The Proposed PWSF is located outside of the Airport Protection Zones. Please see attached Airport Protection Zone Map with PWSF Location.

(4) Signs. Signs for site identification and contact information are required. In addition, for public safety purposes, each PWSF shall have a weather-proof plaque mounted at eye level at or near the PWSF or structure identifying the carriers and dates of permit approval for all antennas on the structure and the location of the County office where further information can be obtained. Such information for PWSFs mounted on buildings may be maintained by the building superintendent or similar agent provided such information is readily accessible on reasonable demand during normal business hours. Any signs required by the FCC or FAA are also allowed. No other signage shall be permitted on any PWSF.

- The applicant acknowledges and shall meet the site signage requirements of this section.

(5) Landscape buffers. Existing natural vegetation shall be undisturbed to the greatest extent practicable and may be counted toward the buffer requirement. Landscaping materials shall consist of xeric or drought-resistant native species and shall be maintained by the operator of the PWSF for the life of the installation....

- New landscaping and supplemental irrigation are not proposed as part of this project. This portion of the parent tract was last harvested and replanted in 2020. Currently, planted pines in the area range from 5-7 feet tall. Per Rayonier, harvesting cycle will include thinning in approx. 10-12 years with full harvest cycle

of 18-20 years. The existing foliage of planted pines creates a natural visual screening from adjacent properties and transportation view corridor.

(6) Access. A 12-foot-wide stabilized access driveway and turn-around area are acceptable unless staff determines, based on public safety concerns, that circumstances require paved access.

- The property and proposed PWSF facility are accessed through an existing gate off north county road 225 via an existing Rayonier 14-foot wide stabilized timber service road. The applicant is proposing a 12' wide stabilized gravel connection from the proposed facility to the existing Rayonier service road. Please refer to Site Plan, Sheet C1C for Details regarding proposed access road.

(7) Occupancy. Communication towers and accessory structures shall be unoccupied.

- The applicant and future wireless carriers will comply with the requirement of this section. There are no habitable structures, potable water or sewer proposed as part of this project.

(8) Modifications. All modifications that, when viewed from ground level from surrounding properties, appear to be of a different size, type, or appearance than what currently exists on or associated with the PWSF, as determined by the Director, must comply with the design standards of this Article. For the purposes of this Subsection, a co-location shall not be considered a modification. All modifications must comply with any conditions or provisions of an existing permit, including special use permits, for the property or structure

- The applicant and future wireless tenants will comply with this section.

Sec. 404.55. - Submittal requirements for tier two and tier three applications.

In addition to the information required for all development applications as found in Chapter 402, Article X, all applicants shall submit the following information, as applicable, as part of an application for a PWSF.

(a) A licensed carrier must either be an applicant or a co-applicant and authorization to act on behalf of the carrier must be submitted.

- Please see attached T-Mobile co-applicant authorization and RF support documentation attached as part of this submittal package.

(b) Co-applicants may include the landowner of the subject property, licensed carriers and tenants for the PWSF.

- Please refer to the zoning application.

(c) Copy of the FCC License (Radio Authorization Form).

- The PWSF shall comply with FCC Requirements. Release of formal FCC Antenna Structure Registration is currently pending the completion of NEPA.

(d) Evidence of compliance with applicable FAA requirements under 14 C.F.R. § 77, as amended. This may be in the form of a copy of the FAA notice of proposed construction.

- Please see attached FAA Determination Aeronautical Study 2023-ASO-20629-OE. The proposed PWSF shall comply with FAA Requirements.

(e) For applications for ground-mounted facilities, proposed site plan, no larger than twenty-four inches by thirty-six inches (24" by 36") with an eight and one-half-inch by eleven-inch (8 $\frac{1}{2}$ " by 11") reduced copy. Site plans should include the following:

(f) Information showing all private aircraft landing facilities registered by the Florida Department of Transportation that are within one (1) mile of the proposed PWSF.

- Please refer to the attached Airports map. There are no FDOT registered aircraft landing facilities within one mile of the proposed PWSF Development.

(g) A statement certifying that, as proposed, the PWSF complies with Alachua County Airport Impact Zoning Regulations in Article VII of Chapter 405.

- The proposed PWSF complies with the Alachua County Airport Impact Zoning Regulations in Article VII of Chapter 405. The proposed PWSF is located outside of the Airport Protection Zones. Please see attached Airport Protection Zone Overlay map for location details.

(h) A fall zone certificate from a licensed structural engineer or evidence satisfactory to the County that the tower and attached PWSFs will not pose a material danger from collapse or debris fall to habitable structures or outdoor areas where people congregate.

- Attached is a fall radius letter to support this item. Tower is 265' Overall Height and designed to collapse within 255 ft. The Tower is setback 350 ft from the nearest property line. There are no habitable structures on the parent parcel or within the tower fall area nor any areas people congregate.

Sec. 404.56. - Additional requirements for tier three applications.

In addition to the requirements above, an applicant for a tier three review shall submit the following information:

(a) Detailed description of request. Description of request including why the request is consistent with the Comprehensive Plan and this ULDC.

- This written description addresses each applicable requirement of the ULDC.

(b) Neighborhood workshop. For all tier three applications, the applicant must conduct a neighborhood workshop pursuant to Article V, Neighborhood Workshops in [Chapter 402](#) of this ULDC.

- A neighborhood workshop was completed pursuant to the above requirement. Please refer to the NWS, Public Notice and Mailing documentation in the attached submittal package. No public attendees were present at the time of the workshop and no public comments were received.

(c) Visual impact analysis report.

- Applicant has submitted a visual impact analysis report consistent with this subsection and at locations provided by the Alachua County Growth Management Department. Please refer to the Line of Site analysis and photo simulation analysis in the attached submittal package.



(d) RF information. To verify that the proposed height of the tower or antennas is necessary to provide the carrier's designed service, the following RF information shall be submitted:

- Please refer to T-Mobile RF Justification Package, Radio Frequency data equipment sheet and Existing Tower to Tower first tier handoff location map attached as part of this submittal package.

(e) Fees. The fee for PWSF special use permit applications shall include the costs of retaining independent technical consultants and experts to properly evaluate the proposed PWSFs. This may include an independent RF evaluation and the preparation of photo simulations of the proposed site.

- Applicant acknowledges and will act in accordance with this section.

Sec. 404.57. - Completeness review.

- Applicant acknowledges and will act in accordance with this section.

Sec. 404.58. - Review timeframes.

- Applicant acknowledges and will act in accordance with this section.

Sec. 404.60. - Inspection, abandonment and obsolescence.

(a) Inspection. The owner or operator of a tower shall provide for and conduct an inspection of the tower at least once every five (5) years. A statement shall be provided to the Alachua County Office of Codes Enforcement verifying structural integrity and tenants on the tower.

- The applicant acknowledges the Inspection, abandonment requirements and shall comply with this section.

Sec. 404.61. - Lighting.

A PWSF shall not be artificially lighted, except for:

(a) Security and safety lighting of equipment buildings if such lighting is appropriately down-shielded to keep light within the boundaries of the site; and

(b) Such lighting of the PWSF as may be required by the Federal Communications Commission, Federal Aviation Administration (FAA) or other applicable authority installed in a manner to minimize impacts on adjacent residences. "Dual lighting" (red at night/strobe during day) shall be utilized unless otherwise recommended by FAA guidelines.

- Applicant acknowledges and shall comply with the requirements of this section. Dual lighting system, red at night and white strobe during day is planned to be installed as required by the FAA.

NexTower Development Group II, LLC.,

Joel Rousseau

Project Manager