




## Staff Report Addendum

**Date:** April 1, 2025  
**To:** Douglas County Planning Commission  
**From:** Eric Pavlinek, Principal Planner   
Jeanette Bare, AICP, Planning Manager   
Steven E. Koster, AICP, Assistant Director of Planning Services   
**Subject:** Rocchio Luly Exemption, Parcel 2, 8<sup>th</sup> Amendment  
**Project File:** US2024-010

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<b>Planning Commission Hearing:</b>	<b>April 7, 2025 @ 6:00 p.m.</b>
<b>Board of County Commissioners Hearing:</b>	<b>April 8, 2025 @ 2:30 p.m.</b>

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The applicant has provided additional correspondence on how it believes the application complies with the 2040 Douglas County Comprehensive Master Plan and the design standards for telecommunication facilities subject to a USR application.

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## DOUGLAS COUNTY COMPREHENSIVE MASTER PLAN

### ASSESSMENT OF COMPLIANCE

#### Project Background

- Hope Media provides Christian adult contemporary music and meaningful talk programming on the non-commercial FM station to serve the residents of its official community of license, Centennial, as well as to serve dozens of other communities in the basin and foothills, including Sedalia and Castle Rock. Soon after the station purchase, Hope Media Group determined that another antenna on the tower is distorting the licensed KXWA signal pattern, thereby preventing the station from fully serving the people in its licensed service area. After many consultations with engineers, it was determined that the best way to correct the technical issue would be to raise the tower height to allow the two antennas to be placed further apart from each other. That necessitates raising the height of the tower to 150 feet.

#### **Goal 3-2 – Nonurban Land Use: Ensure land use and design is compatible with the natural and rural character of the nonurban area.**

The proposed project complies with Goal 3-2 for the following reasons:

- The wildlife in the area will not be affected by the proposed tower extension and antenna.
- The proposed tower extension will be a medium gray color to blend with the sky and the gray green of the tree cover, which will complement the natural landscape.
- We are not proposing any groundwork for this project so the vegetation, soil and landforms will not be disturbed.
- The Federal Aviation Administration (FAA) has approved the tower modification proposal and determined that the tower's location and proposed height do not require that the tower have any lighting installed, thus preserving the dark-sky principles.

#### **Goal 3-3 – Nonurban Land Use: Maintain the unique rural character of the Chatfield Valley (nonurban area), Cherry Valley, High Plateau, Indian Creek, Northeast, West Plum Creek, and Pike National Forest and Foothills Subareas.**

The proposed project complies with Goal 3-3 (Pike National Forest and Foothills Subareas) for the following reasons:

- The proposed project will not affect any new development for recreational opportunities as the proposed tower extension and antenna will be constructed within an already existing telecommunications facility lease area.
- The proposed project will not impact the distinct character of the Pike National Forest.
- The existing telecommunications facility and the proposed tower extension are consistent with the Douglas County Matters of State Interest (1041) Regulations and the Zoning Resolution.
- This project supports responsible development as it will provide better coverage for the non-commercial FM station which serves local residents.

**Goal 5-5 – Community Resources: Maintain high quality standards in planning for utility sites.**

The proposed project complies with Goal 5-5 for the following reasons:

- Rather than building a new facility to accommodate signal needs for Hope Media's FM station, we are proposing to utilize the existing telecommunication facility by increasing the height of the existing tower. Thus, minimizing impacts to the surrounding areas.
- The proposed tower extension will be a medium gray color to blend with the sky and the gray green of the tree cover which will be in harmony with the character of the surrounding environment.

I appreciate your time and welcome any feedback that you may have.

Sincerely,

*Rachel Bruin*

**Rachel Bruin | The Derna Group**  
**On behalf of Hope Media Group and American Tower**  
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## DOUGLAS COUNTY APPROVAL STANDARDS FOR A TELECOMMUNICATIONS FACILITY

### ASSESSMENT OF COMPLIANCE

2107.48.3 In addition to the approval standards stipulated in Subsection 2102, proposed telecommunication facilities shall be located and designed in accordance with the following criteria:

- (1) Proposed telecommunication antennas shall be located on existing support towers where feasible and where the visual impacts are minimal.**

The proposed height increase of the existing support tower will allow the proposed antenna to provide optimal signal that will better service the community. The visual impact will be minimal.

- (2) The facility shall be sited to minimize impact on the environment and wildlife in the region.**

The location of the property is remote and the footprint of the existing telecommunication facility on the same parcel is small. Therefore, the proposed tower extension will have a minimal impact on the environment and wildlife in the region.

- (3) The facility shall be sited to fade into the predominant backdrop of the vicinity by complementing other features and forms in the backdrop landscape.**

The proposed tower extension will be a medium gray color to blend with the sky and the gray green of the tree cover.

- (4) All elements of the facility shall be designed and constructed to result in minimal visual impact. Elements shall be constructed of non-reflective materials that are typical in style and color to area buildings, structures or the backdrop landscape.**

The non-reflective material of the tower extension will match the existing tower. The existing tower's design and materials have been previously approved by the Douglas County Planning Department for compliance with the CMP and design criteria.

**(5) All elements of the facility, including but not limited to the accessory equipment, shall be camouflaged or screened from viewer groups as identified in the VIA. Where proposed, fencing shall be designed to minimize visual impacts.**

The proposed tower extension will be a medium gray color to blend with the sky and the gray green of the tree cover. The ground equipment is concealed as it is located within two existing shelters. In addition, the fenced compound is screened by existing trees which reduce the visibility from the public right-of-way or from existing occupied dwellings.

**(6) Access to the facility shall be designed to minimize land disturbance, (including cut and fill), and visual impacts.**

The contractor will use the existing access road that leads to the existing telecommunications facility on the property. There will not be any additional grading on this site.

**(7) The height of any tower or structure shall be no greater than the distance to the nearest lot line or lease area, except engineered structures which shall be in compliance with the zone district setback.**

The existing tower is more than 250 feet from the nearest property line. The height of the tower with the proposed extension will be 150 feet. As such, the proposed extension will be in compliance with this standard.

I appreciate your time and welcome any feedback that you may have.

Sincerely,

*Rachel Bruin*

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