

**State of Florida
Telecommunications Site Review
FP&L Pole Replacement
Supplemental Review**



Consultants, Inc.

7050 West Palmetto Park Rd #15-652
Boca Raton, FL 33433
Tel: 877.438.2851 Fax: 877.220.4593

May 14, 2015

Mr. Scott Stoudenmire
Deputy Director
Department of Sustainable Development
City of Coconut Creek
4800 West Copans Road
Coconut Creek, Florida 33063

**RE : T-Mobile Wireless Application
Florida Power and Light Transmission Pole Replacement
T-Mobile Site Name : FB2140A**

Dear Mr. Stoudenmire,

At your request, on behalf of the City of Coconut Creek, Florida ("City"), CityScape Consultants, Inc. ("CityScape") in its capacity as telecommunications consultant for the City, has considered the merits of an application provided by T-Mobile Wireless ("Applicant") to replace an existing antenna support structure currently used by FP&L for their internal communications between sub-stations and FP&L operations. The subject facility is owned by Florida Power and Light Company and is located at the intersection of NW 54th Avenue and NW 40th Street in Coconut Creek, Florida, *see figure 1*.

The proposed new structure is anticipated to have a height of one hundred two (102) feet. T-Mobile proposes to install their antennas at the ninety-seven (97) and eighty-seven (87) foot levels of the tower and it appears the structure will be capable of supporting one additional collocation at approximately eighty-two (82) feet, as noted in *figure 2*.

CityScape has reviewed the submitted reply by FP&L, *see figures 3 and 4*, and provides the following response:

1. Unless deemed to have a categorical exclusion under the National Programmatic Agreement ("NPA") (FCC 04-222, released October 5, 2004), the Applicant must provide NEPA and SHPO documentation. If the applicant believes this installation is categorically excluded under the NPA, it must provide documentation and explanation for the purported exclusion from NHPA and SHPO requirements.

2. According to paragraph 173 of the FCC's Wireless Infrastructure Report and Order (FCC 14-153, released October 21, 2014)(the "Report"), "...local governments should retain authority to make the initial determination (subject to the constraints of Section 332(c)(7)) of which non-tower structures are appropriate for supporting wireless transmission equipment";

once the proposed facility is added to the electrical transmission pole, the site becomes a wireless communications facility and pursuant to paragraph 188 of the Report, "States and localities may continue to enforce and condition approval on compliance with generally applicable building, structural, electrical, and safety codes and with other laws codifying objective standards reasonably related to health and safety." Accordingly, the applicant should furnish the previously requested certification regarding compliance with the ANSI/EIA/TIA 222-G standards.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. Edwards", is written over a light yellow rectangular background.

Richard L. Edwards
FCC Licensed
PCIA Certified
CityScape Consultants, Inc.

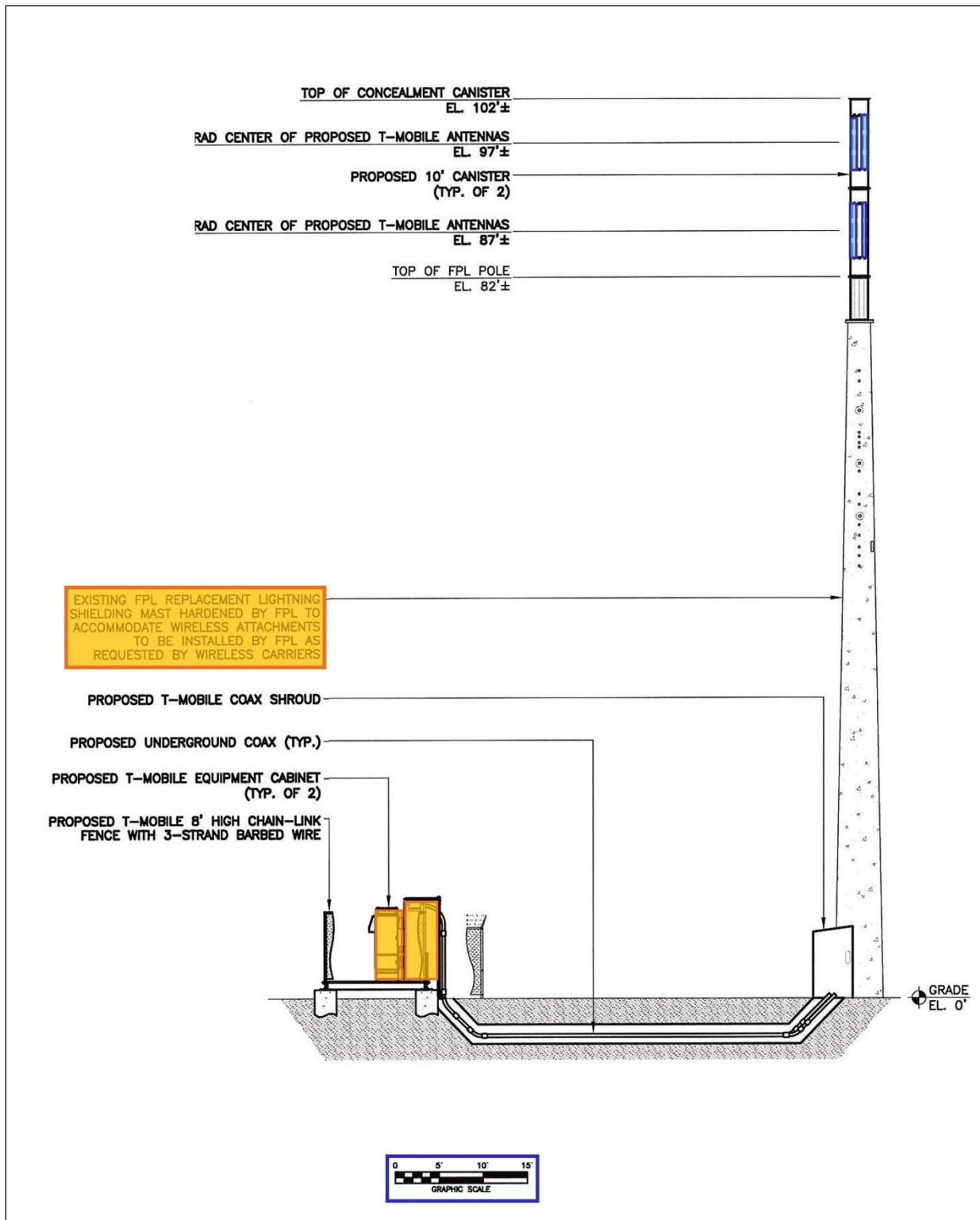


Figure 2. Proposed tower elevation



April 8, 2015

Mr. Scott Stoudenmire, Deputy Director
City of Coconut Creek
Department of Sustainable Development
4800 West Copans Road
Coconut Creek, FL 33063

RE: **DRC Project# PZ-15020002:** FPL Cullum Substation (T-Mobile FB2140A) Wireless Application –
Proposed Condition # 1 (NEPA & SHIPO documentation)

To Whom It May Concern,

This letter is to address CityScape's proposed condition #1 in their letter dated Feb. 17, 2015:

The Applicant shall submit all required applicable NEPA and SHPO documentation.

FPL's Cullum Substation is a fully permitted and developed parcel of land which includes over an acre of rocked substation, electrical equipment, fences, access road, relay vault, berms, drainage features, landscaping and underground conduit and wires running through the entire property. The substation was constructed in 1994 and all permits (including environmental and drainage) were obtained at that time.

This application entails only the addition of wireless antennas on an FPL substation pole and equipment cabinets on a small area of the substation property. As a result, FPL feels that NEPA and SHPO documentation would not be required in this case.

Please call me at, (561) 904-3675, if you have any questions.

Sincerely,

Gregg Hall
FPL Substation Siting & Permitting Manager

Cc: Rick L. Edwards, Director, CityScape Consultants, Inc. (email)
Bruce Barber, FPL FiberNet
Anne Hoctor, FPL FiberNet Permitting Contractor

Florida Power & Light Company
700 Universe Boulevard (TS4/JW), Juno Beach, FL 33408

Figure 3: FPL response to condition #1



April 22, 2015

Mr. Scott Stoudenmire, Deputy Director
City of Coconut Creek
Department of Sustainable Development
4800 West Copans Road
Coconut Creek, FL 33063

RE: **DRC Project# PZ-15020002**: FPL Cullum Substation (T-Mobile FB2140A) Wireless Application –
Proposed Condition # 2 (Structural Fall Zone Standards & Setbacks)

Mr. Stoudenmire,

This letter is to address CityScape's proposed condition #2 in their comments letter dated Feb. 17, 2015:

The Applicant shall provide a signed and sealed statement from a Florida Registered Engineer that this tower, as constructed will meet the fall zone standards for Broward County Florida under ANSI/EIA/TIA-222-G, as amended, and the South Florida Building Code maintaining the setback specification for the subject zoning district.

It is my understanding that FPL's substation and transmission structures (poles) are exempt from this requirement and are not classified as communication towers per Florida statutes. FPL structures (such as this lightning shielding mast) are required to comply with stringent structural design requirements (ie. extreme wind loading) in order to maintain a reliable substation and transmission system for all of our customers. In addition, the South Florida Building Code setbacks for these FPL structures would also not apply.

Please call me at, (561) 777-6037, if you have any questions.

Sincerely,



Ray Lopez | Manager, Wireless Attachments
9250 W Flagler St, Miami, FL 33174 | www.FPLFiberNet.com
(O) 305-552-3796 | (C) 561-777-6037 | (F) 305-229-5820

Your Connection. Our Responsibility.

Cc: Rick L. Edwards, Director, CityScape Consultants, Inc. (email)
Bruce Barber, FPL FiberNet
Anne Hoctor, FPL FiberNet Permitting Contractor

FPL FiberNet

9250 W Flagler St, Miami, FL 33174

Figure 4: FPL response to condition #2