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LDC26-002 Commercial Mobile Radio Service (CMRS) to Wireless Communication Facility (WCF) Development Application Amendment (DAM)

Study Session
May 12, 2026

Presenter: Ernie Rose, Senior Planner



Purpose & Request

- Seeking Approval from the BOCC regarding
 - Amending the Development Application Manual (DAM) CMRS to WCF Transition
 - Proceed with the next steps for Public Referrals and Hearings

Alignment with Strategic Plan

- Provide essential and mandated service
- Be Community Focused



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The Different Types of Wireless Communication



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- Satellite Communication.
- Infrared Communication.
- Broadcast Radio. ...
- Microwave Communication.
- Wi-Fi. ...
- Mobile Communication Systems.
- Bluetooth Technology.

WIRELESS COMMUNICATION

Types of Wireless Communication



Background & Discussion



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The BoCC approved the WCF code amendment in September 2025. The next step in the process is updating the CMRS section of the DAM

The proposed revisions:

1. Re-titles the CMRS regulations to WCF and establishes specific rules for Eligible Facility Requests (EFR).
2. Establishes the review criteria for “eligible facilities” and non-eligible facilities
3. Adds a new process for the Eligible Facility Request that covers fees, streamlined submittal requirements, which end with an EFR determination letter.
4. Adds workflow diagrams.
5. Introduces Shot Clock timelines for each case
6. Sets Fees for EFR’s and Non-eligible facilities
7. Provisions for WCF’s in the Right-of-Way



Eligible Facility Requests (EFR) New Process

Minor modification under Section 6409 of the Spectrum Act and FCC rules

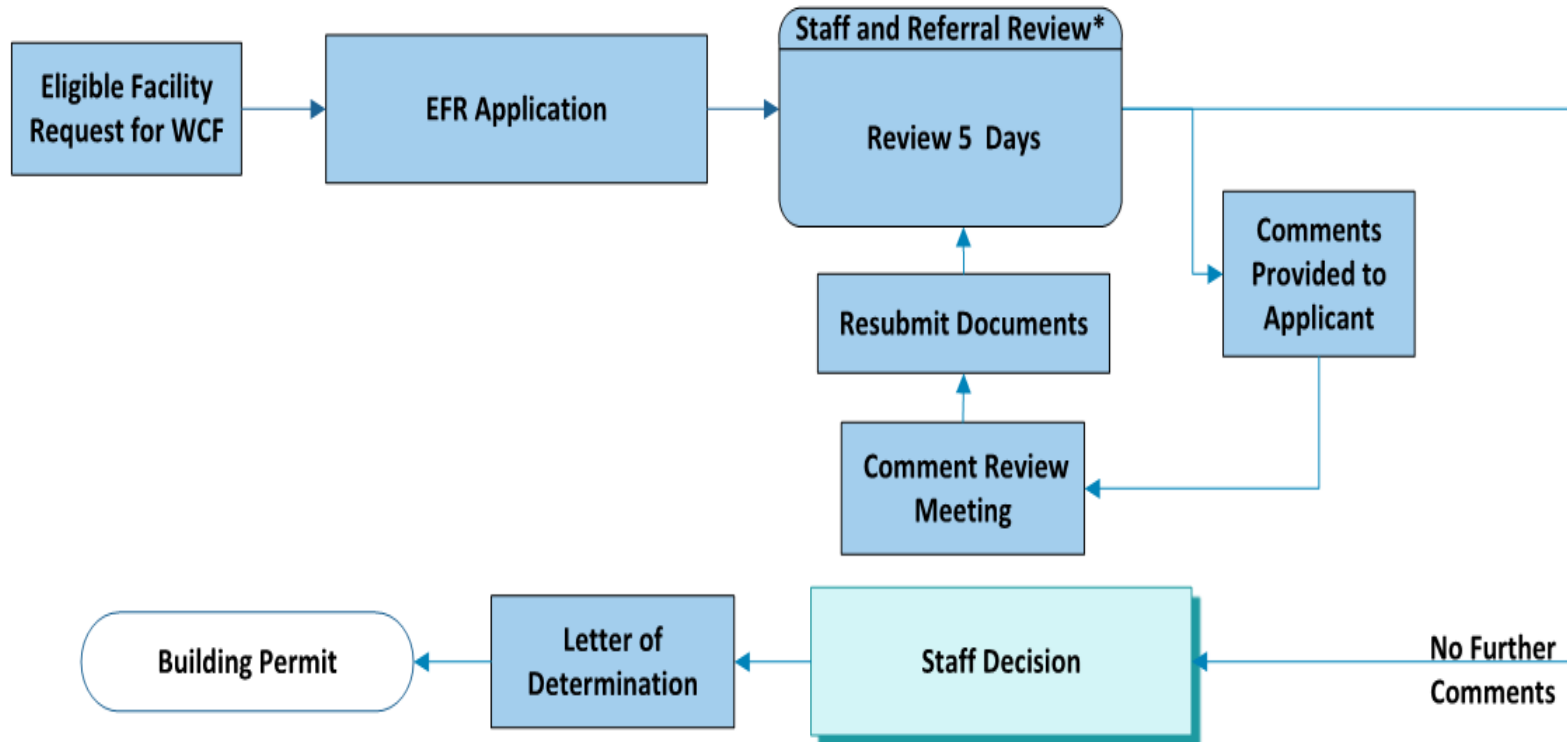
- New Eligible Facility Request Process
 - Timing
 - 60-day decision
 - Tolling – incomplete notice tolls applications
 - Failure to Act Application Granted
 - New Eligible Facility Request Form posted on website
- Workflow Chart on Private Property
- Proposed Fees:
 - EFR Determination Letter \$500.00



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EFR on Private Property

Days = Working Days
(does not include weekends or County holidays)



WCF ELIGIBLE FACILITY REQUEST FORM



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WIRELESS COMMUNICATION ELIGIBLE FACILITY REQUEST

Administrative Review

An eligible facilities request includes any request for modification of an existing tower or base station that **does not substantially change** the physical dimensions of such tower or base station, involving:

- Collocation of new transmission equipment; or
- Removal of transmission equipment; or
- Replacement of transmission equipment.

Substantial change means a modification that substantially changes the physical dimensions of an eligible support structure provided that such modification meets any of the following criteria:

Determination Criteria

Yes/No	Criteria
	Does the modification increase the height of the tower by more than the greater of: (a) 10%; or (b) the height of an additional antenna array plus separation of up to 20 feet from the top of the nearest existing antenna?
	Does the modification add an appurtenance to the body of the tower that would protrude from the edge of the tower by 20 feet or more than the width of the tower structure at the level of the appurtenance, whichever is greater?
	Does the modification involve the installation of more than the standard number of new equipment cabinets for the technology involved or add more than four new equipment cabinets?
	Does the modification entail any excavation or deployment outside the current site by more than 30 feet in any direction, not including any access or utility easements?
	Does the modification defeat the concealment elements of the eligible support structure?
	Does the modification violate conditions associated with the siting approval for the tower or base station other than as specified in 47 C.F.R. § 1.6100(c)(7)(i) – (iv)?

WIRELESS COMMUNICATION ELIGIBLE FACILITY REQUEST

Application Requirements:

Applicant's Name and Organization:
Site Address:
Phone
Email:
Name of Property Owner:
Address of Property Owner
Previous Case Number (If available):

Required Submittal Documents shall include the following:

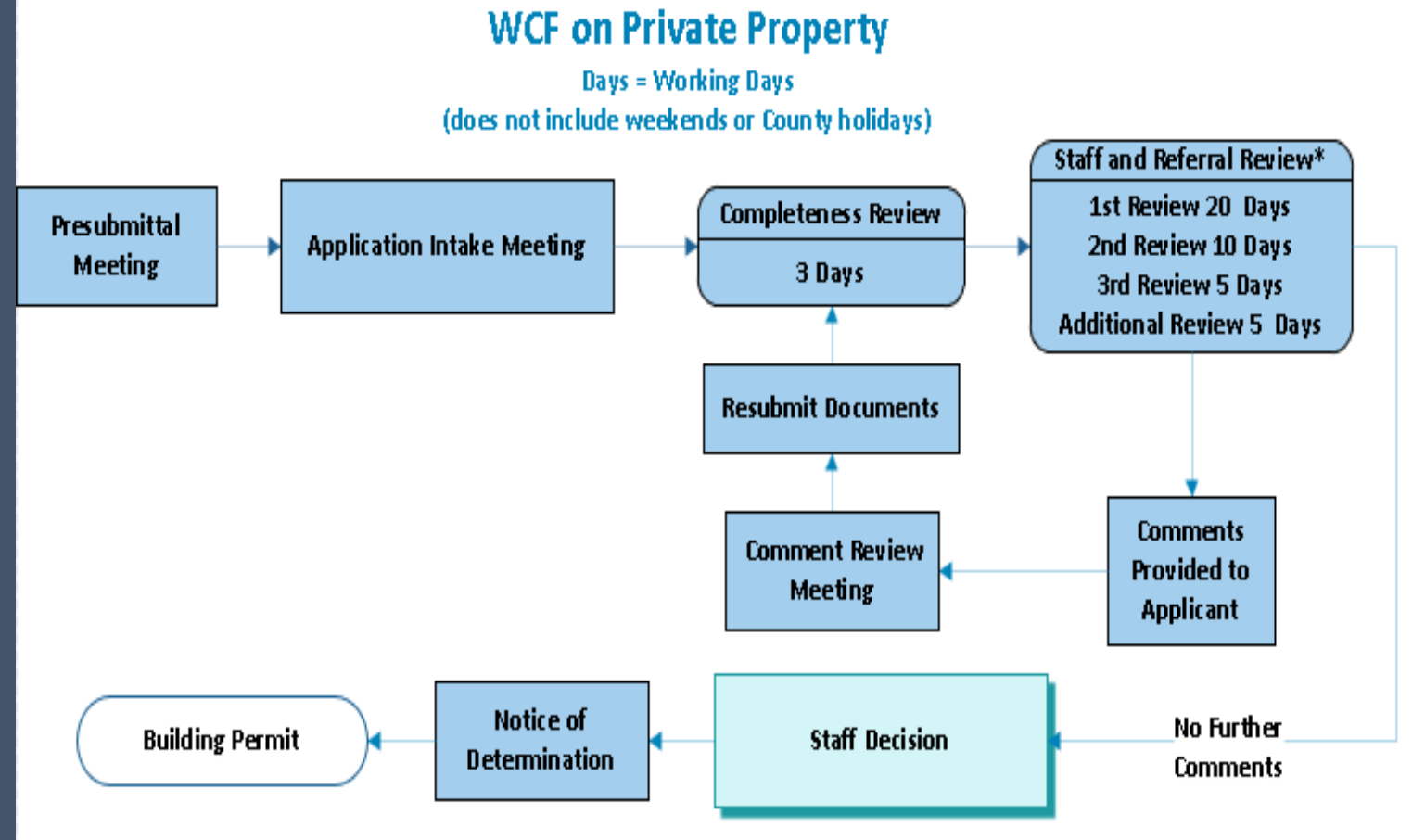
1. Site Plan showing all locations of buildings on site and the location of the proposed antenna(s) and equipment shelter.
2. Letter stating how your project meets the substantial changes determination criteria under 6409.
3. Elevations of buildings, existing monopole (if applicable, etc. that will support the antenna).
4. Elevations of any proposed structure for equipment changes (cloud these) including color, material, architecture, etc.
5. Enhanced photograph or 3D perspective, to scale, showing the exact location of the proposed antenna(s) and any proposed equipment shelter.
6. Original telecom approval and zoning letter.
7. **Existing Site** - Letter from the tower owner stating approvals for the antenna & equipment shelter locations, construction, and architecture.





Non-Eligible Facility Request - Process

- Pre-submittal Meeting
- Submittal Requirements
- Submittal Materials
- Timing (Shot clock)
 - 30-day
 - 90-day
 - 150-days
- Fees



WCF Fees Eligible and Non-Eligible Facility



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- Staff Recommendations:
 - No change to the fees on WCFs on private property or in the public right-of-way. \$1,500
 - Recommended Fee \$645

ELIGIBLE FACILITY REQUESTS (EFR) JURISDICTIONAL FEES

Jurisdiction	Fee
Douglas County	\$225.00
Jefferson County	\$550.00
Boulder County	\$160.00
Weld County	None
Larimer County	688.70
Park County	\$550.00
City and County of Broomfield	\$200.00
City of Littleton	\$2,250.00
City of Centennial	\$500.00
City of Englewood	None
City of Boulder	\$100.00
Federal Heights	\$100.00
City of Colorado Springs	None
City of Westminster	\$250.00
City of Thornton	\$100.00
Average	\$380.00

STAFF RECOMMENDATION: The Planning Staff reviews the submitted EFR documentation, researches past case data, and prepares an EFR determination letter. The entire process generally takes 5 hours. The Hourly Billable Rates for employees involved in the process are set by the Support Services Division. The hourly rates are based on the average salaries of employees involved in the EFR review process.

Planner:	133.17 fully loaded hourly rate = 4 hrs.	\$532.68	Recommended Fee \$645
Planning Tech	112.94 fully loaded hourly rate= 1hrs	\$112.94	
		TOTAL: \$645.62	





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Planning And Land Development

Need a Quick Answer?

During business hours (M-F, 8 a.m.-4:30 p.m.) talk to someone to get the information you need quickly. Call 720-874-6650 and ask for:

- **Planner on Call** for questions about current land development activity or processes for land development approvals.
- **Zoning on Call** to find the zoning on properties, check allowable land uses, report a property concern or ask about fence or sign permits.
- Use the [Form Center to submit a Report, Request or Question](#) to the Planning or Zoning Divisions. Please select Planning or Zoning from drop down menu.
- Learn more about [Public Works On Call](#)
- **Customer Access** allows you to upload documents, check project status and make payments.

CUSTOMER ACCESS

Wireless Communication Facilities Regulations

Property



Alternatives



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The Board has several options:

1. Direct staff to proceed with the proposed code amendment to the public hearing.
2. Direct staff to consider modifications to the proposed code amendment and return for an additional study session.
3. Direct staff not to proceed with the proposed code amendment.

Fiscal Impacts

The proposed amendment is not anticipated to have any fiscal impact.



Staff Recommendation

Staff recommends approval to move forward with the proposed amendment as presented.



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Concurrence

The Public Works and Development Department coordinated the draft changes with the County Attorney's office and Clarion Associates.

