



David Elliott, Eukon Group, APC Towers  
 65 Post Suite 1000,  
 Irvine CA. 92618  
 808-489-1191

David.Elliott@EukonGroup.com

**Date:** October 8, 2025

**To:**

Planning Department  
 City of Coachella  
 1515 Sixth Street  
 Coachella, CA 92236

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**Project Description: Request for Construction of New Wireless Tower, Height Increase, and Stealthing Waiver for APC Towers and Verizon Wireless Facility**

**Site Address / APN: 49640 Oates Lane/ 603-300-013**

Dear Planning Staff,

On behalf of **APC Towers and Verizon Wireless**, we respectfully submit this project description letter to request approval for the following wireless communication facility modifications at the above-referenced parcel:

1. **Construction of a new monopole** to relocate off of the existing ATC tower;
2. **A height increase from 55 feet to 85 feet** for the new structure; and
3. **A waiver from the stealthing requirements** to allow a **non-stealth (naked) monopole**, consistent with existing conditions at the site.

These requests are essential to maintain reliable wireless coverage for Verizon customers in the area and are supported by a combination of **technical necessity, regulatory compliance, and existing site constraints**.

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**Justification for New Tower Construction on Same Parcel**

The current Verizon Wireless colocation on the APC Tower, located on this parcel must be **decommissioned and removed**. As a result, Verizon is **unable to remain on the existing coverage** and must construct a **new monopole** to ensure continuity of service in this area. To maintain **existing coverage levels**, the new monopole must be sited in close proximity to the current structure. Relocation to a new parcel would result in **significant coverage gaps** and require the buildout of additional facilities to compensate for the loss—an inefficient and unnecessarily impactful outcome for the City and its residents.

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**Exhaustion of Co-Location Opportunities**

The Eukon Group has conducted a thorough **site acquisition and co-location analysis** as part of its due diligence process. **All viable co-location options within the area have been evaluated and exhausted**.

Unfortunately, **no existing towers or structures are available that can accommodate Verizon's equipment at the necessary height, configuration, or location** to meet current and future **RF coverage and capacity objectives**. Further, no existing facilities provide the same network footprint required to maintain seamless service in this portion of the City.

Accordingly, the construction of a **new, standalone monopole** on the same parcel as the existing facility is the **only feasible solution** to preserve Verizon's service in the area.

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**EukonGroup**

Corporate Offices:  
 65 Post, Irvine, CA 92618  
 949-55-EUKON Office

### Height Increase Justification (From 55' to 85')

The proposed **85-foot height** is essential to replicate the RF coverage currently provided by the existing tower. Verizon's engineering analysis confirms that a 55-foot tower would result in **significant signal loss**, coverage degradation, and potential service interruptions—particularly indoors and at the network's edge.

Under **Coachella Municipal Code Section 17.86.090(A)(1)**, a waiver is appropriate where adherence to local regulations would **have the effect of prohibiting wireless service**, as defined by the **United States Telecommunications Act of 1996 (47 U.S.C. §332(c)(7)(B)(i)(II))**.

### Stealthing Waiver Justification

While **Section 17.86.080(C)** of the Coachella Municipal Code generally requires stealthing measures for wireless facilities, Verizon respectfully requests a waiver under **Section 17.86.090(A)(2)** based on the following:

- **Visual Consistency:** The existing facility on this parcel is a **non-stealth (naked) monopole**. Replacing it with a stealthed structure, such as a monopalm, would introduce **visual inconsistency** and draw more attention to the site, thereby defeating the intended aesthetic purpose.
- **Engineering Limitations:** Stealth structures often restrict the number and orientation of antennas that can be deployed. A camouflaged design may not accommodate the **technical and RF performance requirements** needed for Verizon's network in this location.
- **Non-Discrimination:** Denial of a non-stealth structure in this case would **unreasonably discriminate** against Verizon Wireless under **47 U.S.C. §332(c)(7)(B)(i)(I)**, given that **functionally equivalent, non-stealth facilities already exist**—including on this very parcel.

### Consistency with Code Intent and Public Interest

This proposal complies with the broader **intent of the City's wireless ordinance** by minimizing new site development, maintaining existing coverage, and providing essential service continuity—all while staying within an already developed wireless use parcel.

This project will:

- Preserve existing RF coverage without degradation;
- Minimize the introduction of new sites elsewhere in the community;
- Continue to support reliable wireless and emergency communications; and
- Comply with all applicable FCC and FAA regulations.

### Independent Consultant Review

In accordance with **Section 17.86.090(B)**, APC Towers agrees to fund and support the City's engagement of an **independent third-party consultant** to evaluate this waiver request. A deposit and full reimbursement for the consultant's services will be provided as required.

### Conclusion

In summary, APC Towers and Verizon Wireless respectfully requests the City's approval for:

- Construction of a **new, standalone monopole** on the existing parcel;
- A **height waiver to 85 feet** to maintain service coverage; and
- A **stealthing waiver** to permit a **non-stealth monopole**, consistent with the visual character of the existing facility.

These requests are supported by **exhaustive co-location analysis**, detailed engineering review, and legal protections under federal law. They are also in the **public interest**, ensuring uninterrupted wireless service for residents, businesses, and emergency responders in Coachella. The full application package includes:

- Site plans and elevations

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- RF coverage maps (existing vs. proposed)
- Photo simulations
- Authorization for independent consultant review

We appreciate your time and consideration of this critical infrastructure request. Please do not hesitate to contact us if additional information is needed.

Sincerely,

**David Elliott**

Site Acquisition

Eukon Group, Agent of APC Towers

808-489-1191

David.Elliott@Eukongroup.com