Case No. 21PD022

Legal Description:

Lot 4 of Block 3 of Stoney Creek South Subdivision, located in Section 22, T1N, R7E, BHM, Rapid City, Pennington County, South Dakota
May 13, 2021

Rapid City Planning Commission
c/o Ms. Vicki Fisher, Director, Community Development
300 Sixth Street
Rapid City, South Dakota 57701

Re: Request for Major Amendment to a Planned Development Overlay
Applicant: Verizon Wireless (Verizon Site Ref. RCY SW Rapid City)
Loftus Dental Property, 5615 Nugget Gulch Road

Dear Rapid City Planning Commission and Community Development Department:

On behalf of our client, Verizon Wireless ("Verizon"), we are pleased to submit the enclosed application to construct a new wireless communications facility ("Facility") at the Loftus Dental property near the intersection of Catron Boulevard and Nugget Gulch Road, intended to improve Verizon’s voice and data service in southwestern Rapid City.

Without a doubt, elected and appointed officials in Rapid City, and those who reside in or travel through southwestern Rapid City might attest, the service gap existing in this area of Rapid City warrants a solution. Anecdotally, we can personally attest to the lack of reliable Verizon service in this part of Rapid City observed in our own time spent there working to improve wireless connectivity, and further, through conversations with residents we’ve met and spoken with. We have also been made aware of specific complaints reported publicly regarding poor Verizon service in the area, including reports from residents of nearby Corral Park Apartments as well as a medical emergency suffered by a resident of the Autumn Hills subdivision in Rapid City. These matters evidence how improved connectivity on the Verizon network is critical to day-to-day needs of the community as well as the safety and welfare of the general public.

We have worked for years with Verizon, Dr. and Mrs. Loftus, and others, to arrive at a design for the Facility proposed herein. Our goal has been to propose a facility that would collectively address the existing lack of Verizon service in southwestern Rapid City, meet the standards of The Rapid City Zoning Ordinance, and blend in with the character of the Loftus Dental property and surrounding neighborhoods. The enclosed application and materials reflect a culmination of these efforts.

A wireless network is a finite resource: in other words, a wireless network is only capable of providing so much service “supply” to a given area of “demand.” Existing wireless network infrastructure can only be optimized to a certain extent before additional wireless infrastructure (i.e., wireless communications facilities, cell towers, and so
forth) must be deployed. It is important to note that while the proposed Facility at the Loftus Dental property will provide much-needed improvement to a specific service issue on Verizon's network in southwestern Rapid City, further Verizon infrastructure will be required in Rapid City to address constant growth in demand on the network. This growth is a product of an increasing number of devices served by the network (per capita) and more and more data consumed per device.

Demand upon, and usage of, wireless networks in Rapid City can generally be assumed to coincide with nationwide wireless network usage trends. To that end, we submit the following statistics reported by the Centers for Disease Control and Prevention (CDC)*:

As demonstrated in the above graph, as of 2013, 39.1% of households with adults and no children were "wireless only" households (meaning they had no land line telephone service). Likewise, 47.1% of households with children were "wireless only."

1 Note that in 2003, incidences of "wireless only" households with or without children were around 3%. In other words, between 2003 and 2013, wireless-only households grew at a compounded rate of roughly 31% per year.
Fast forward to the first half of 2020, the CDC reported that 62.5% of adults and 73.6% of children lived in wireless only households\(^2\) as shown by the graph below.

![Graph showing percentages of wireless-only households](image)

**Figure. Percentages of wireless-only adults and of children living in households with only wireless telephone service, by age group: United States, January-June 2020**

NOTE: Wireless-only adults are adults who live in households with only wireless telephone service and have their own wireless telephone.

SOURCE: National Center for Health Statistics, National Health Interview Survey.

As these data demonstrate, in just a seven year span between 2013 and 2020, the United States went from less than half of its population residing in wireless-only households to nearly three in four households depending solely upon wireless communication.

The above data and figures reflect general trends in wireless data consumption, and trends in how individual households nationwide have generally moved towards a wireless-only situation, with no traditional land line connectivity. The above data reflect a diminished ability of the CDC to collect public health data mirrored by evidence of how prevalent wireless network usage has become for day-to-day convenience.

NENA, the 9-1-1 Association provides additional data on wireless network usage beyond the household statistics the CDC indicates. Among NENA’s reporting, they indicate that as of February 2021, in many areas, **80% or more**
911 calls are made from wireless devices. That is to say that as of 2021, four in every five 911 calls are made on a cell phone or wireless device. Undoubtedly, Rapid City—and the nation—will rely on wireless communications in emergency situations more and more, but addressing those emergency requests are entirely dependent on available wireless network infrastructure coverage and capacity.

Beyond the inherent wireless service needs in Rapid City demonstrated by the above data, note that we have worked closely with Verizon to propose a design for the Facility on the Loftus Dental facility consistent with The Rapid City Zoning Ordinance. While not specifically required in the City’s Zoning Ordinance, Verizon proposes to build a low-profile communications structure on the Loftus Dental property (in lieu of a basic lattice-style tower or uncoated, galvanized monopole with unainted communications equipment). The proposed Facility will include a freestanding, 80-foot tall monopole with communications equipment mounted on short standoffs (i.e., flush-mounted), all painted a uniform color to blend in with the built and natural environment. A small, ground based shelter housing equipment which will support the communications equipment on the monopole will be placed on site, as shown in the enclosed drawings.

The footprint of the Facility (i.e. the monopole, equipment shelter, and parking facilities to serve the site) will be set slightly below improved grade as indicated in the enclosed site plan. Access to the Facility from the public right-of-way will require grading and removal of existing substrate to accommodate a bituminous driveway from Bendt Drive to the Facility. The enclosed letter from Anthony Dorland, Attorney and Legal Counsel for Verizon Wireless in this matter, further details how the proposed Facility meets the City’s planning and zoning requirements.

Enclosed in this package to supplement the request for a Major Amendment to the Planned Development Overlay underlying the Loftus Dental property, you will find the following materials:

- Exhibit A: Letter from Moss & Barnett Attorney, Anthony Dorland (Legal Counsel for Verizon Wireless in this matter)
- Exhibit B: Zoning Drawings (v.2) depicting the proposed Facility
  - These drawings were reviewed by City Staff of Rapid City in 2020, with no major concerns. Of note, City Staff indicated that (i) the proposed driveway and sidewalk improvements must be built according to City requirements, and (ii) no ADA parking is required at the Facility. Verizon Wireless will comply with these design indications.
- Exhibit C: Propagation Maps simulating existing and proposed Verizon service relative to the proposed Facility
- Exhibit D: Alternative Candidate Analysis
  - A review of properties and facilities considered by Verizon to improve wireless voice and data service in southwestern Rapid City in lieu of the Loftus Dental site
- Exhibit E: Photographic Simulations of the proposed Facility at the Loftus Dental property
- Exhibit F: A petition signed by twenty (20) residents of Rapid City urging the City to support the improvement of connectivity infrastructure.

Rapid City
Verizon’s request to construct the proposed Facility is urgent, as data presented in this application indicates. We are moving to a world more and more reliant on wireless voice and data connectivity, and Rapid City’s support of this application and the proposed Facility will serve to address a great need in the Community.

On behalf of Verizon Wireless, thank you for your support and consideration of the enclosed application.

Very Truly Yours,

[Signature]

Brian Kabat
Kabat Consulting Inc. for Buell Consulting, Inc.

Site Acquisition Consultant on behalf of Verizon Wireless

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Enc.

*The CDC collects public health data based upon surveys conducted through telephone interviews. As more and more households turn to wireless voice and data service, households also tend to disconnect land-based telephone services. This makes households harder to reach; in turn, affecting the sample size the CDC is able to draw upon to analyze and report on national health statistics.


3 https://www.nena.org/page/911Statistics