

March 6, 2024

Bill Dermody, AICP
Current Planning Manager
Planning & Economic Development
25 W. 4th Street, 14th Floor
Saint Paul, MN 55102

Re: T-Mobile Temporary Pole / Interim Use Permit / 732 Central Ave West

Dear Mr. Dermody,

T-Mobile previously operated antenna facilities on the tower at Maxfield Elementary School, which was decommissioned in early April. As a result, this area of Saint Paul currently lacks a dedicated site for coverage. This absence has led to surrounding sites compensating for the gap, consequently increasing network capacity demands and diminishing service quality and reliability for both the immediate and surrounding areas.

Crown Castle, owner of the Maxfield Elementary tower, has proposed constructing a new replacement tower at Pilgrim Baptist Church. To limit the duration of reduced network quality during the ongoing development and construction of the new tower, T-Mobile proposes the installation of a 76-foot temporary pole which will be removed upon the installation of the permanent site, estimated by the end of 2026.

The placement of telecommunication facilities within predominantly residential neighborhoods, particularly those with few tall buildings, presents certain challenges. T-Mobile strives to integrate sites into the local community while maintaining optimal network performance. Compliance with local regulations is always preferred, but rare cases occasionally necessitate relief from specific performance standards.

In this instance, the church parcel offers limited locations for both a permanent and temporary tower that allows the latter to fully comply with the tower height plus 38-foot (114-feet total) residential dwelling setback. Due to the need for excavation to build the permanent site's foundation, the temporary pole needs to be sufficiently separated to maintain the structure's stability and allow adequate space to safely operate construction equipment.

The proposed temporary location that can accommodate the construction of the permanent tower would be situated 55 feet and 110 feet from the nearest residences to the east and south,

respectively. T-Mobile therefore kindly requests an interim use permit to waive this requirement through the end of 2026.

Interim use permits in the City of Saint Paul are governed by Minnesota State Statute 462.3597. The following section outlines how the proposed temporary tower complies with said statute:

Subd. 2. Authority. Zoning regulations may permit the governing body to allow interim uses. The regulations may set conditions on interim uses. The governing body may grant permission for an interim use of property if:

- (1) the use conforms to the zoning regulations;*

The proposed use is compliant except for the residential dwelling setback which is the reason the IUP is being requested. Note, T-Mobile has also applied for a Commercial Temporary Structure permit (DSIBLDC-032237-2026).

- (2) the date or event that will terminate the use can be identified with certainty;*

The proposed end date is December 21, 2026.

- (3) permission of the use will not impose additional costs on the public if it is necessary for the public to take the property in the future; and*

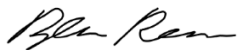
T-Mobile will be removing and restoring the property to its original condition.

- (4) the user agrees to any conditions that the governing body deems appropriate for permission of the use.*

Acknowledged and agreed upon by Applicant.

Thank you in advance for your time in reviewing our application and please do not hesitate to contact me via email or the number below with any questions or requests for further information.

Sincerely,



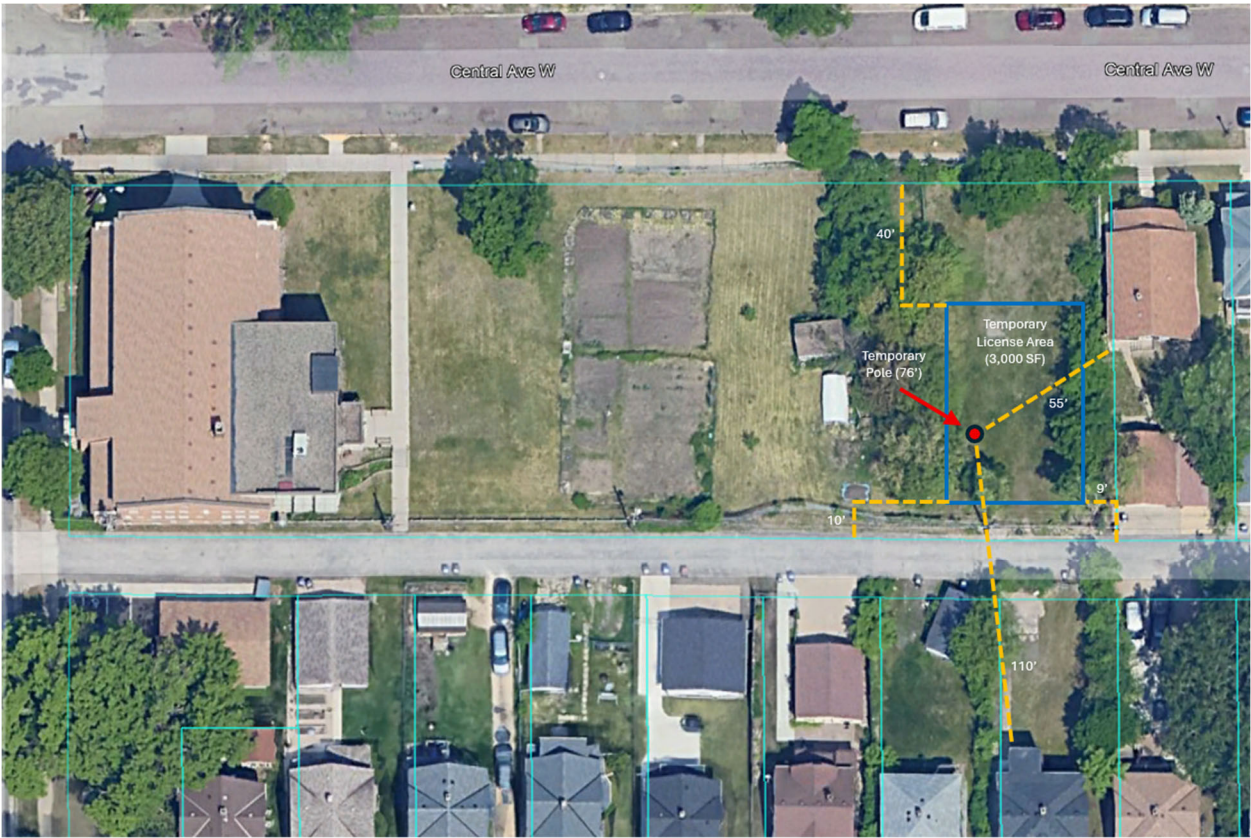
Blair Ransom

Site Development Agent o/b/o T-Mobile

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Temporary Tower - Site Plan



Tower Elevation

