

June 3, 2016

Via Email to ktodd@westfield.in.gov

Mr. Kevin M. Todd, AICP
Senior Planner
City of Westfield
2728 E. 171st Street
Westfield, IN 46074

Re: Crown Castle Special Exception Application

Dear Mr. Todd:

Thank you for the opportunity to submit additional evidence supporting findings in favor of Crown Castle's special exception request.

As you are aware, the Court's Order of April 18, 2016, identified the following two findings about which Crown Castle could provide, and the Board of Zoning Appeals consider, further evidence:

1. Whether the Special Exception will not be injurious to the use and enjoyment of other property in the vicinity for the purposes already permitted, nor substantially diminish and impair the property value within the neighborhood; and
2. Whether the establishment of the Special Exception will not impede the normal and orderly development and improvement of surrounding property for uses permitted in the district.

We have included additional information relative to these findings to assist the Board of Zoning Appeals in its redetermination of this matter. Specifically, as further support for satisfying each of these findings, Crown Castle is submitting the following materials:

- A. Vicinity Assessed Value Analysis (Tower Site at 141st and Towne Road).** The exhibit was presented at the hearing on this matter last year. During the course of the Court's review of Crown Castle's appeal, the remonstrators suggested that the property closest to the tower maintained a lower assessed value (at least relative to other homes in the vicinity) as a result of its proximity to the tower. The supplemental analysis makes clear that the home closest to the tower actually maintains the **highest** assessed valuation per square foot and further that differences in valuation between and among homes in the subdivision are actually attributable to overall square footage rather than proximity to the

tower. The assessed valuation analysis demonstrates that the tower in no way substantially diminishes property value within the neighborhood.

Additionally, this exhibit reflects the development of the subdivision after the construction of the tower. It evidences that the tower's presence did not impede the normal and orderly development and improvement of the surrounding property for home sites.

We have also provided an additional sample of homes well from the tower location vicinity (but with comparable building materials, sizes and designs) to show that homes in the vicinity of the tower have a substantially equivalent (and on average an even greater) assessed value as compared to the assessed values for home sites further removed from the tower vicinity. This comparison reinforces the conclusion that the tower does not diminish or impair property values.

- B. Subdivision Development (Tower Site at 126th and Hazel Dell Road).** This is a new exhibit to this matter (though one that has been used in other wireless cases within the City of Westfield) to demonstrate that the presence of wireless infrastructure in no way impedes the normal and orderly development of surrounding properties, nor is such infrastructure injurious to the use and enjoyment of property in the vicinity. As this exhibit demonstrates, the Plum Creek subdivision was developed and home sites constructed after the establishment of the tower. Rather than detracting from the use and enjoyment of surrounding properties or in any way impeding the development of such properties, the tower provides infrastructure supporting 911 communications to area residents, voice communications for work and life, as well as for wireless internet and data transmissions in a mobile society.

As with the exhibit summary under Paragraph A, the vicinity assessed value analysis shows that the tower does not substantially diminish and impair neighborhood property values.

- C. Hendricks County Subdivision Development.** To provide still further evidence that the items summarized in Paragraphs A and B above are the norm and not the exception, we have also provided a similar exhibit showing the development of a large-scale subdivision adjoining a previously-built tower in Hendricks County, Indiana. Again, these facilities contribute critical infrastructure and in no way do they adversely impact the use and enjoyment of adjoining properties, the property values of area properties or the orderly development of adjoining properties.

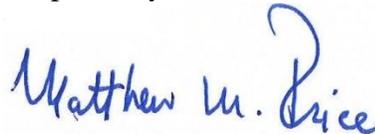
We also note that the adjoining Bent Creek subdivision to the south of the subject site is equipped with a 50-foot buffer along its northern property line (the property line adjoining Crown Castle's site). Additionally, the lots within the subdivision are oriented away from the tower location and towards the future Maple Creek Drive (in the same manner that subdivisions in the attached aerials are oriented to back-up to the nearby towers). The buffer area, together

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with the lot orientation away from the site, reinforces the finding that the tower will have no adverse impact on the Bent Creek Subdivision (or its orderly development, use for home sites, or the values of those homes in a like manner with the historical examples provided with this letter).

We again appreciate the opportunity to submit this additional evidence in support of Crown Castle's special exception petition and look forward to attending the Board of Zoning Appeals' meeting on June 14, 2016.

Respectfully submitted,



Matthew M. Price

MMP/rea
Att.
17494644

cc: Donald Lewinsky, Esq.
Brian Zaiger, Esq.

**141st Street & Towne Road
Carmel**

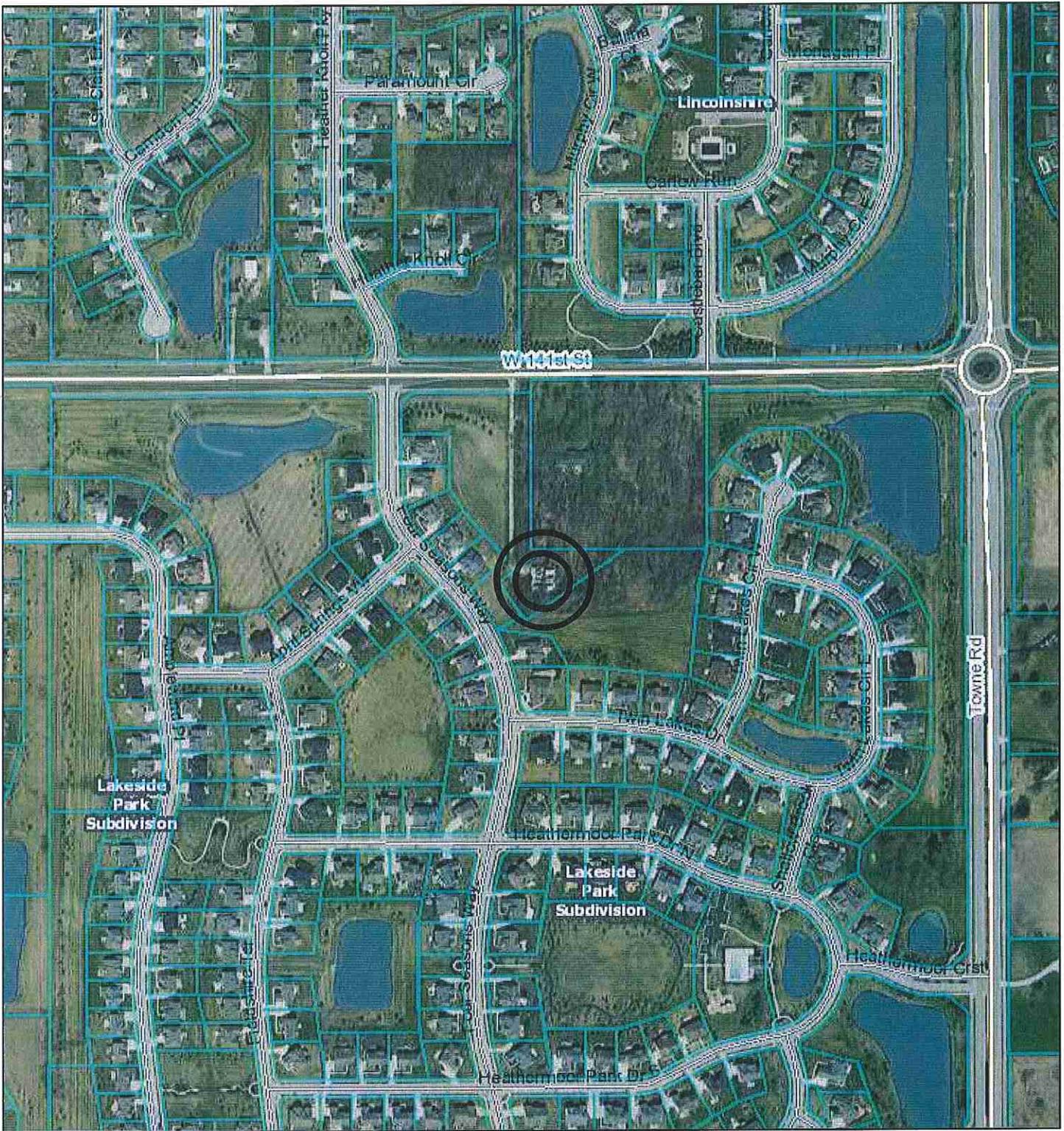
**Existing Tower
Vicinity Assessed Value Analysis***

Location	Address	Assessed Value (Jan. 1, 2016)	Square Feet (finished area)
A	13975 Four Seasons Way	\$353,400	2,684
B	13941 Four Seasons Way	\$419,600	4,083
C	13956 Four Seasons Way	\$377,600	2,973
D	13942 Four Seasons Way	\$339,200	2,517
E	13970 Four Seasons Way	\$445,300	4,568
F	13987 Four Seasons Way	\$433,200	4,485
G	2705 April Springs View	\$435,000	4,009
H	14021 Four Seasons Way	\$449,800	4,886
I	2525 West 141 st Street	\$419,400	2,200
J	2660 Twin Lakes Drive	\$420,200	3,413
K	2646 Twin Lakes Drive	\$438,300	4,565
	Mean (Average)	\$411,909	3,671

*This table confirms that the communications tower near the southwest corner of 141st Street and Towne Road in Carmel, Indiana has had no negative effect upon the property values of single-family dwellings in the immediate vicinity. Additionally, all of these homes (except 2525 W. 141st Street, identified as "I") were constructed *after* the tower was erected.

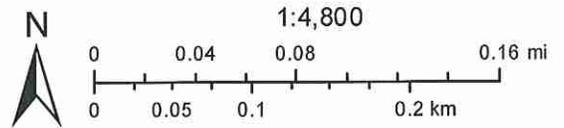
The vicinity assessed value analysis demonstrates that there is no correlation between proximity to the nearby tower and diminished property values. To the contrary, the home closest to the tower (Property "A") maintains the second highest assessed value (per square foot) out of the 10 closest properties within the subdivision. Similarly, Property "C" (the third closest property to the tower site and the only property which actually faces the tower) maintains the third highest assessed value of the 10 closest properties within the subdivision. The analysis further indicates that larger homes (those with more square feet) are assessed at higher total values, without regard to the home's proximity to the tower.

141st St & Towne Rd -- Existing Tower



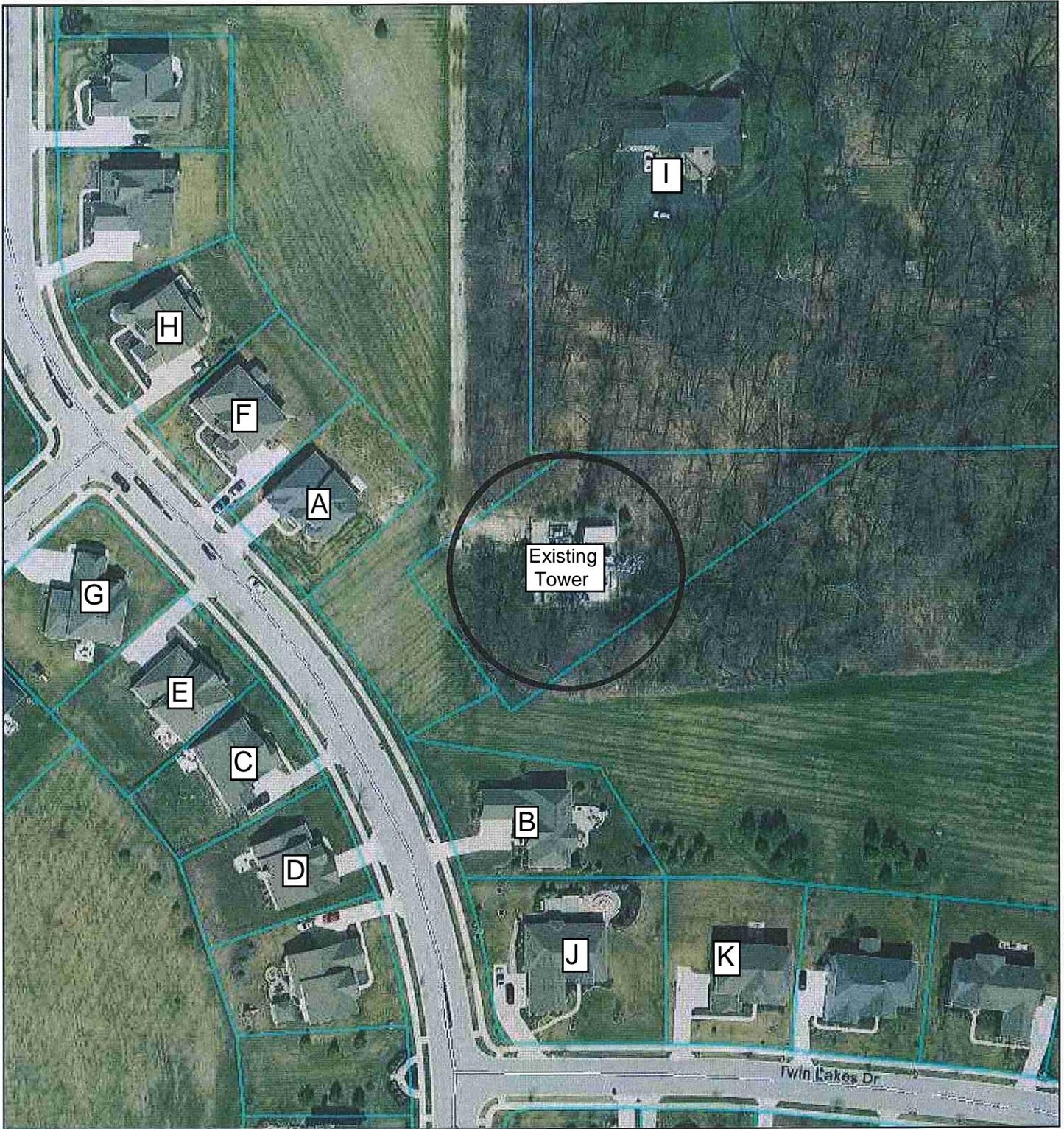
June 1, 2016

 Parcels



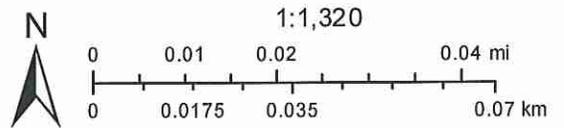
Basemap information here

141st St & Towne Rd -- Existing Tower



June 1, 2016

 Parcels



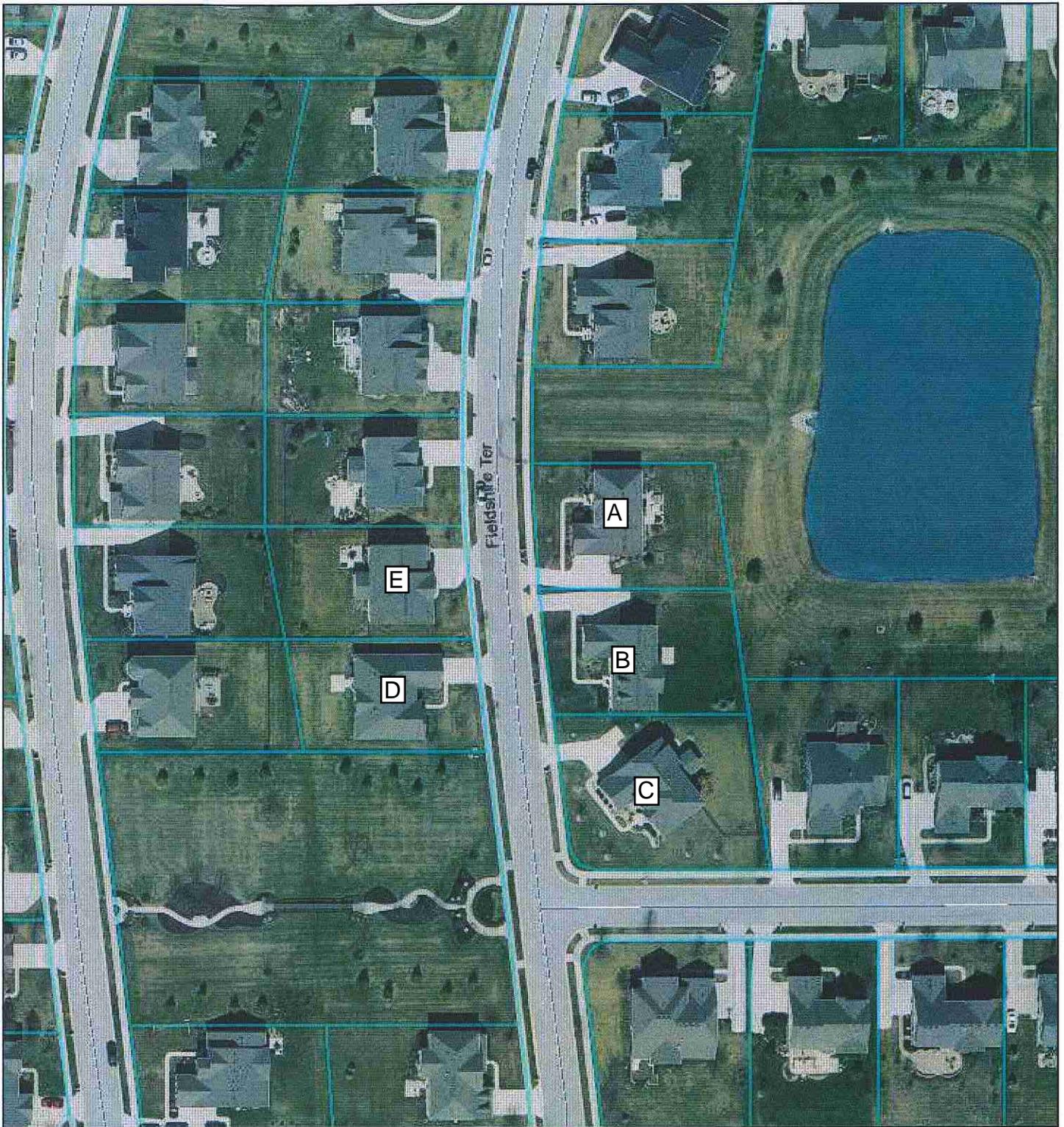
Basemap information here

**Other Lakeside Park Homes
(141st Street & Towne Road)
Carmel**

**Properties Away From Existing Tower
Assessed Value Analysis**

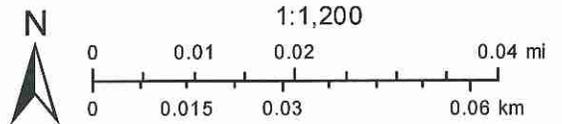
Location	Address	Assessed Value (Jan. 1, 2016)	Square Feet (finished area)
A	13761 Fieldshire Terrace	\$404,400	4,410
B	13747 Fieldshire Terrace	\$369,200	2,992
C	13725 Fieldshire Terrace	\$419,900	4,333
D	13744 Fieldshire Terrace	\$389,100	3,400
E	13758 Fieldshire Terrace	\$370,400	3,641
	Mean (Average)	\$390,600	3,755

Other Lakeside Park Homes



June 3, 2016

 Parcels



Basemap information here

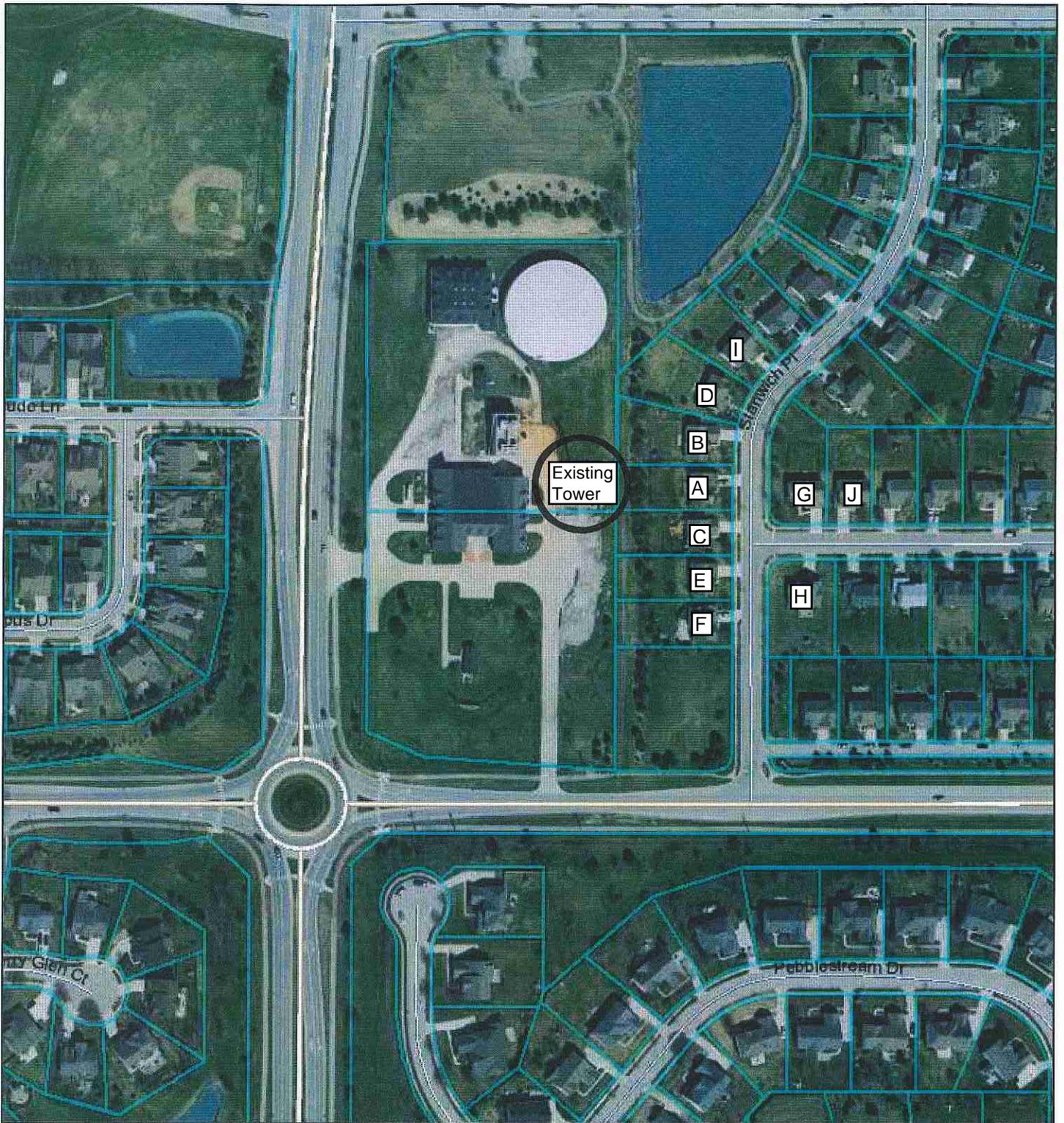
**126th Street & Hazel Dell Road
Carmel**

**Existing Tower
Vicinity Assessed Value Analysis***

Location	Address	Assessed Value (Jan. 1, 2016)	Square Feet (finished area)
A	12628 Stanwich Place	\$190,200	1,958
B	12636 Stanwich Place	\$213,000	2,424
C	12620 Stanwich Place	\$200,400	2,142
D	12642 Stanwich Place	\$203,700	2,078
E	12514 Stanwich Place	\$189,200	1,984
F	12608 Stanwich Place	\$212,200	2,288
G	5860 Sandalwood Drive	\$200,700	2,058
H	5859 Sandalwood Drive	\$202,400	1,971
I	12648 Stanwich Place	\$213,000	2,404
J	5866 Sandalwood Drive	\$201,600	1,971
	Mean (Average)	\$202,640	2,128

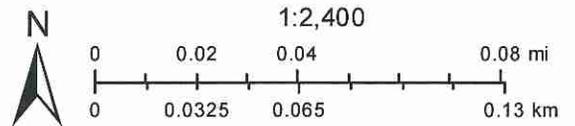
*This table confirms that the communications tower near the northeast corner of 126th Street and Hazel Dell Road in Carmel, Indiana has had no negative effect upon the property values of single-family dwellings in the immediate vicinity. Additionally, all of these homes were constructed *after* the tower was erected.

126th St & Hazel Dell Rd - Existing Tower



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 Parcels



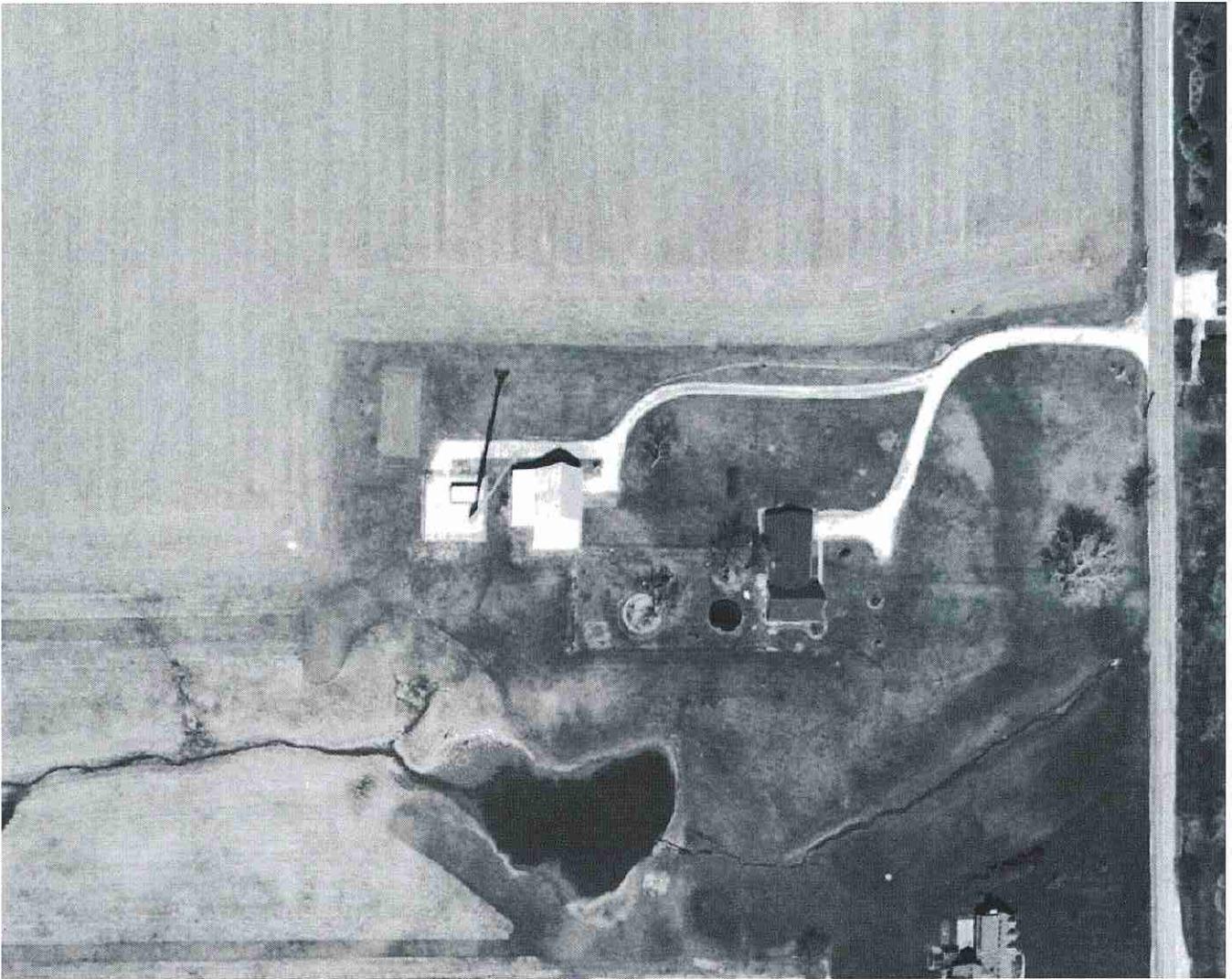
Basemap information here

**56th Street & Raceway Road
Hendricks County**

**Existing Tower
Vicinity Assessed Value Analysis***

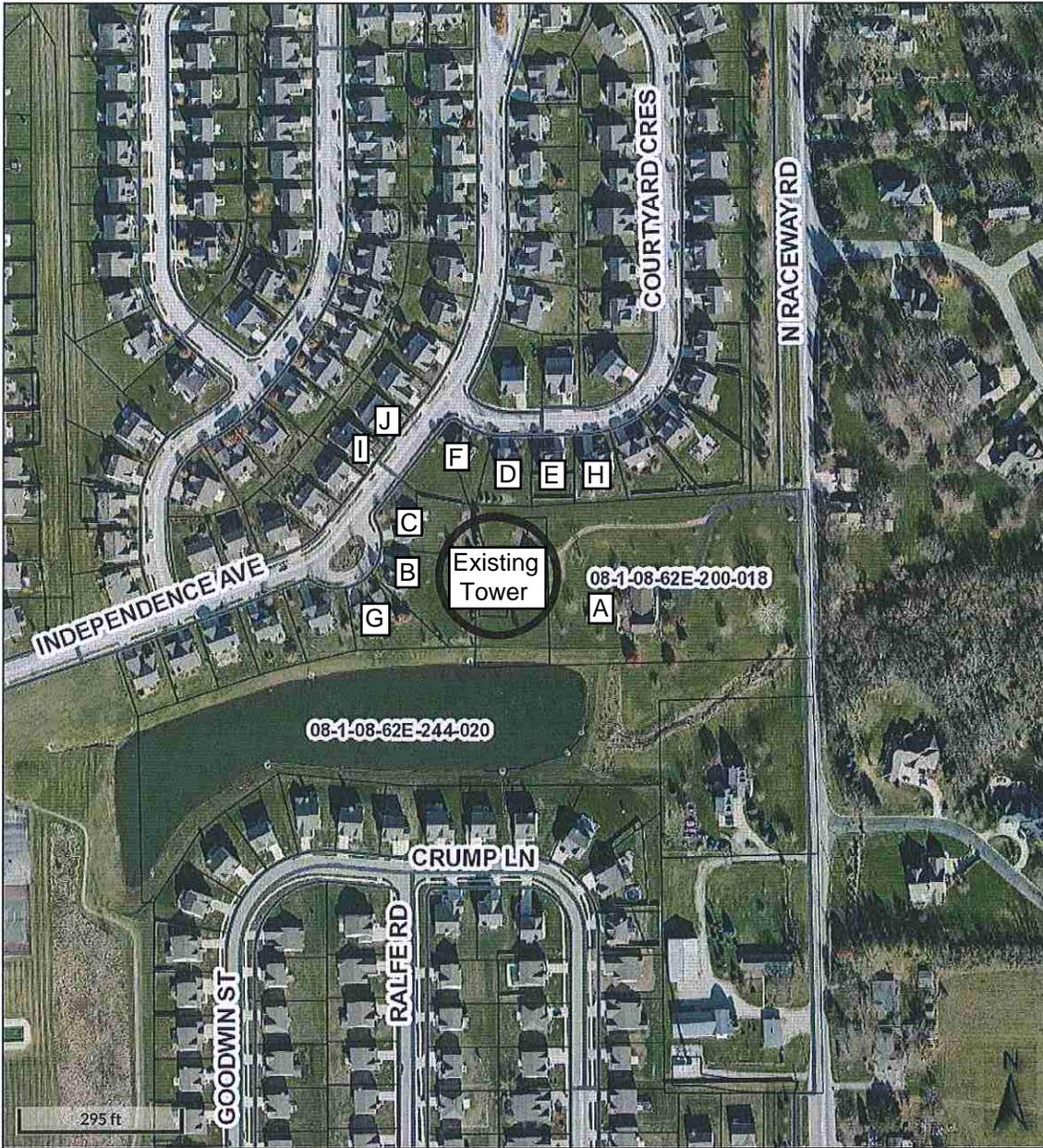
Location	Address	Assessed Value (2015)	Square Feet (finished area)
A	5784 N. Raceway Road	\$226,200	2,675
B	5767 Independence Ave	\$171,900	2,269
C	5773 Independence Ave	\$166,600	2,489
D	5799 Courtyard Cres	\$176,100	2,240
E	5809 Courtyard Cres	\$183,100	2,980
F	5789 Courtyard Cres	\$153,500	2,222
G	5765 Independence Ave	\$185,400	1,924
H	5817 Courtyard Cres	\$194,900	2,610
I	5780 Independence Ave	\$160,500	2,040
J	5784 Independence Ave	\$136,200	1,636
	Mean (Average)	\$175,440	2,309

*This table confirms that the communications tower near the southwest corner of 56th Street and Raceway Road in Hendricks County, Indiana has had no negative effect upon the property values of single-family dwellings in the immediate vicinity. Additionally, all of these homes (except 5784 N. Raceway Road, identified as "A") were constructed *after* the tower was erected.



1999 Aerial Photograph

5784 N. Raceway Road



Overview



Legend

- Parcels
- Right of Way
- Townships
- Road Centerlines
- Culverts
- Culverts 2008

Date created: 6/3/2016