# Xcel Energy Small Cell Co-Location SONO Entrance Requirements

## Department
Department of Transportation, Right-of-Way Services, Engineering & Regulatory

## Authority
Department of Transportation Rules and Regulations (DOTI) for Encroachments and Encumbrances in the Public Right-of-Way, and DOTI Utility Plan Review; City Charter, Art II; and Denver Revised Municipal Code (DRMC), Chapter 49

## Document Date
September 1, 2020

## Approvals and Applicant Obligations
All Small Cell Antenna infrastructure proposed to be placed upon or between Xcel Energy-owned poles in the public Right-of-Way (ROW) of the City and County of Denver (City or CCD) must obtain a City-signed Statement of No Objection (SONO) from the City prior to applying to Xcel Energy for their approval. Applications for SONO will be reviewed pursuant to these Entrance Requirements.

Please note that completion of this Process does not substitute or replace any additional permits or approvals that may be required from the City, such as DOTI Construction Permitting (Street Occupancy for construction equipment, Street Cut to excavate into the right of way, Erosion Control if over 1 acre of disturbed soil) or specific permitting from affected City departments including but not limited to Denver Parks and Recreation, Forestry, Landmark, or others.

Please note that completion of this Process also does not substitute or replace any additional permits, approvals, or processes that are required by State and Federal Law, including but not limited to that of the Nationwide Environmental Policy Act (NEPA) and Colorado State Historic Preservation Office (SHPO).

For your convenience, we have provided information here on where to obtain Construction Permitting from DOTI: www.denvergov.org/dotipermits

## Summary of Approval Process
Small Cell Programs proposing the placement of Small Cell facilities upon or between Xcel Energy-owned poles in the ROW (Co-Locate) shall first request a Statement of No Objection (SONO) letter from the City by following the procedures within this document.

After the applicant receives their signed SONO, the applicant can then pursue approval from Xcel Energy. The applicant is responsible for providing a City-signed copy of the SONO to Xcel Energy. If Xcel Energy denies a location included in a SONO, it is the applicant’s responsibility to notify the City.

Note that the process described in this document was designed for Co-locations proposed for each Co-Locate site, and does not include provisions for bundling associated fiber optic and power conduit with a SONO application. Fiber optic and power conduit associated with these poles is expected to be designed and submitted in a separate application, and permitting of same can be handled as follows:

- Submit a separate Utility Plan Review application
- Submit directly to DOTI Construction Permitting if the total aggregate length of all conduit associated with the pole Group is less than thresholds requiring a Utility Plan Review. Reference Utility Plan Review Requirements for more information.

## Maintenance, Repair, Replacement, and Removal
As a condition for placement of Small Cell facilities in the ROW, the owner of the small cell facilities shall:

- Maintain all equipment and appurtenances in a timely and responsible manner; and
- Promptly repair any damage to the ROW or adjacent private property resulting from the installation, placement, attachment, repair, modification, removal, operation, use, or relocation of
small cell facilities and return such property to its original condition, including restoration or replacement of any damaged trees (as determined by the City Forester for trees in the ROW), shrubs or other vegetation. The City may opt to perform the repair and charge to the applicant if the applicant fails to respond to a notice requiring repair, or when the unrepaired facility is an imminent danger to the public; and

(c) Existing trees in the public ROW shall be protected per the Office of the City Forester (OCF) standards and practices. Install tree protection for all existing ROW trees adjacent to proposed construction – refer to the Office of the City Forester (OCF) for specifications. Tree protection shall be installed prior to construction and shall remain in place throughout construction. No excavation shall take place within the Critical Root Zone (CRZ) or Structural Root Zone (SRZ) without authorization from the OCF; and

(d) Notify OCF and adjacent property owner(s) when existing trees are to be impacted by proposed construction. Potentially impacting construction activity includes: canopy pruning for clearance, installation of bore pits, hand holes, and foundations within the CRZ and SRZ; and

(e) When applicable obtain all State and Federal Environmental and Historic clearances and send evidence of same to DOTI.SmallCell@denvergov.org and DPRPlanningreview@denvergov.org prior to applying for construction permitting; and

(f) Remove all graffiti experienced on any of its small cell facilities or other property or equipment located in the public ROW; and

(g) Remove all non-operational or abandoned small cell equipment within one hundred twenty (120) calendar days if not operating or following abandonment of the site. The light pole shall remain or be replaced as determined by Xcel Energy; and

(h) Notify DOTI in writing not less than 10 business days prior to removal of small cell equipment. The Applicant shall obtain all permits and approvals required for removal of its small cell facilities prior to removal; and

(i) Notify DOTI in writing not less than 10 business days prior to replacement/upgrade of small cell equipment and shall provide an updated RF certification report at a minimum. The City may require additional information prior to providing a signed SONO for the changes; and

(j) Otherwise fulfill maintenance obligations per the Co-locate agreement established with Xcel Energy.

### Order of Priority

The following is the order in which the City prioritizes, and prefers Co-Locate deployments:

1. **Type 3 Combination Small Cell and Metal Streetlight Pole** – the removal of an existing wood streetlight pole and replacement with a Type 3 metal combination streetlight small cell pole.

2. **Type 2 Attachments to Wooden Streetlight Poles** – The temporary attachment of small cell facilities onto an existing, wood streetlight pole. The small cell facilities may remain on the wood streetlight pole until that time the block receives new streetlight infrastructure, but not more than two years.

3. **Type 1 Attachments to Utility Poles and Utility Lines** – The small cell facilities may remain on existing wood poles, or between wood poles, until that time Xcel Energy’s overhead facilities are undergrounded.

Regarding Wood Poles: Xcel Energy issues the final determination if an existing wood pole can accommodate the proposed small cell attachment, or if it must be replaced. If the wood pole exhibits any of the following deficiencies in the sole judgment of Xcel Energy, the wood pole must be replaced prior to attaching small cell equipment: noticeable and large cracks, vehicular impact damage, pole is leaning from a level placement, or pole has a Class 5 tag.
Regarding Metal Pole Swaps: Xcel Energy issues the final determination if a wood pole can be swapped for a Type 3 metal combination pole dependent on the ability to underground existing overhead electrical. Undergrounding of overhead electrical must be less than 1,000 feet and must not have diagonal, overhead services that would also require undergrounding.

**Application Submittal Requirements**

All proposed Co-Locate sites shall be separated into Group(s) based on the type of installation per the City and County of Denver Small Cell Infrastructure Design Guidelines (e.g. Type 2, Type 3A, etc.). It is also strongly recommended that proposed sites in parkways/adjacent to parks or in CDOT ROW be separated into their own Group(s) for ease of processing. Groups shall not include more than 25 sites, and no more than 3 Groups shall be submitted in any given week for consideration.

Any submissions requesting SONO not meeting all minimum requirements herein will be rejected as incomplete.

- **Completed and Signed Co-Location SONO Application Review Checklist**

- **Small Cell Co-Locate Group spreadsheet** (Excel format) sorted in same order as other areas of application, per the following example.
  - Filename "CompanyName YEAR-Group # Co-Locate Info.xlsx"

<table>
<thead>
<tr>
<th>Site ID</th>
<th>Group No.</th>
<th>Nearest Intersection</th>
<th>Lat</th>
<th>Long</th>
<th>Existing Pole Type</th>
<th>Replacement Pole Type</th>
<th>Notes</th>
</tr>
</thead>
</table>

- **Plan Documents (PDF)** for proposed Co-Locations formatted to 11”x17”, including the following minimum criteria (please note that any plan set not meeting all minimum checklist criteria herein will be rejected as incomplete):
  - Filename "CompanyName YEAR-Group # Co-Location Plans.pdf"
  - Cover sheet containing
    - Title indicating submittal is for Xcel Energy Co-Location
    - Carrier name, Year - Co-Location Group Number
    - Vicinity map scaled to include all locations included in the subject application
    - Site location table including site name, nearest property address, and coordinates
    - Project contact information
  - Site Plan Sheet(s)
    - One Site Plan Sheet per Co-Location Site
    - Show, label and dimension facility details for verification that proposed equipment is compliant with City and County of Denver Small Cell Infrastructure Design Guidelines
    - Each Site Plan Sheet must contain the following at a minimum:
      - Vicinity Map
      - Plan View Detail
      - Numerical and bar scale (scale not to exceed 1” = 40’)
      - North arrow
      - Show, label, and dimension: ROW, property lines, easement lines, edge of pavement, curb and gutter, sidewalks, signal equipment clear zones, distance from pole (or foundation if raised) to back of curb, distance from pole (or foundation if raised) to ROW, distance from pole (or foundation if raised) to nearest edge of sidewalk
      - Elevation View Detail, show, label and dimension:
        - Cabinet base width, pole width, antenna width, overall height, existing pole and luminaire height, proposed pole and luminaire height, cabinet base height, antenna height, luminaire arm length
        - Size, dimension, and height of any projections(s) from the pole
      - Front-facing photo, i.e. must be taken from the street-side facing towards the Xcel Energy facility and must include a minimum of approximately 10 feet on either side (Google Streetview is acceptable if image is truly front-facing and there are no cars/items obstructing the view, not older than 3 years, and no major changes to the area)
    - Site Project Information Table per the following example:
Application Submittal Requirements Continued

<table>
<thead>
<tr>
<th>SITE PROJECT INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITE ID</td>
</tr>
<tr>
<td>LATITUDE</td>
</tr>
<tr>
<td>LONGITUDE</td>
</tr>
<tr>
<td>NEAREST INTERSECTION</td>
</tr>
<tr>
<td>XCEL POLE NO.</td>
</tr>
<tr>
<td>EXISTING</td>
</tr>
<tr>
<td>POLE OWNER</td>
</tr>
<tr>
<td>POLE TYPE</td>
</tr>
<tr>
<td>POLE HEIGHT</td>
</tr>
<tr>
<td>LUMINAIRE TYPE</td>
</tr>
<tr>
<td>POLE COLOR</td>
</tr>
<tr>
<td>ATTACHMENTS</td>
</tr>
</tbody>
</table>

- **Completed “Statement of No Objection” Editable Document** (Microsoft Word format, City provided template)
  - Filename “CompanyName YEAR-Group # Pole Locations.doc”
  - If the City does not object to the proposed Co-Locations within submitted Group, the Applicant will receive a signed copy of this letter.

- **RF Certification Reports** for each proposed site:
  - Filename “CompanyName YEAR- Co-Locate Group # RF Certification Reports.pdf”
  - Reports are to be presented and provided in 2 parts as defined in the City and County of Denver Small Cell Infrastructure Design Guidelines, Chapter 9

- **Current, All-Inclusive Small Cell Program Pole Location Geodatabase** (City provided geodatabase template)
  - Filename “CompanyName YEAR-Group #.gdb”
  - Must include ALL small cell installation (freestanding and co-locations)
  - Must include ALL known, connecting underground fiber and electrical facilities
  - Must update attribute fields for all locations for each submittal
  - A link to the geodatabase template is provided under ‘Additional Documents’ here
  - Submitted geodatabase must follow the template exactly or it will be rejected

Application Submittal Instructions

Submit your application for SONO to the City and County of Denver Department of Transportation and Infrastructure (DOTI) per the following:

- Applications shall not include more than 25 sites, and no more than 3 Groups shall be submitted in any given week.

- Submit the **Current, All-Inclusive Small Cell Program Pole Location Geodatabase** using the City provided geodatabase template via a Denver FTP using the following credentials:
  - Denver FTP: [https://exteft.denvergov.org](https://exteft.denvergov.org)
  - Login: smallcell, Password: 5mallC3l!
  - Select the geodatabase file for transmittal and drop it into the FTP. Do not create folders within the FTP tool.
  - Submittals provided by any other means will not be accepted.
  - Submittals not using the geodatabase template as provided will cause an error when transmitting and it will not automatically populate the online small cell map.

- Send an email to DOTI.SmallCell@denvergov.org
  - Email Subject: “CompanyName Small Cell Co-Locate Group # – 1st/2nd, etc. Submittal”
  - Include required application materials (except for Current, All-Inclusive Small Cell Program Pole Location Geodatabase) as an attachment or include a document delivery link (e.g. dropbox) to download the materials.
### Design and Placement Requirements

In addition to meeting Xcel Energy’s design requirements, all new or modified Small Cell Antenna installations shall be located and designed in accordance with current City and County Small Cell Infrastructure Design Guidelines, and any variances to the guidelines as noted below. The City Design Guidelines were developed in collaboration with Xcel Energy’s design requirements. Should a conflict in design requirements occur, the applicant must coordinate with both Xcel Energy and the City to find resolution. A link to the current guidelines is provided [here](#).

It is the applicant’s responsibility to verify all design and placement criteria can be met, prior to replacement of an Xcel Energy pole. This includes adhering to all ADA upgrading requirements, as well as the following placement considerations:

1. Located in the amenity zone and aligned with existing trees and lights.
2. Located with minimum clearance from intersections, alleys, and driveways in accordance with Transportation Standards and Details.
3. Located behind an attached sidewalk and not encroaching into sidewalk (including raised foundations).
4. Located outside of the pedestrian access route (PAR) and not encroaching into the minimum ADA clearance required by Transportation Standards and Details.
5. Located adjacent to Parks’ facilities/parkways when there are no other viable co-location options in the area. Deployments adjacent to parks and parkways are subject to Parks’ review.
6. Placement at a low volume, non-signalized, residential neighborhood intersection when an existing freestanding pole is removed from the program or if it is the only viable co-locate option in the area and that placement at corner also results in the omission of freestanding pole(s). Placement at any corner will require additional documentation and justification as to why location is the only viable option in the area and no other locations are available outside of the corner.

Street Lights in which a new or modified Small Cell Antenna will be Co-located must also be designed in accordance with the current City and County of Denver Street Lighting Design Guidelines. A link to the current guidelines is provided [here](#).

The applicant shall obtain appropriate review and approval for applicable historical sites listed or eligible for listing in the National Register of Historic Places through State Historic Preservation Office (SHPO) as required by the Federal Communications Commission (FCC) prior to applying for constructing permitting and prior to installing any small cell equipment. The City reserves the right to require documentation of SHPO approvals prior to issuing construction permitting. Any violation of this Federal requirement and/or other applicable federal, state, or local laws will result in the removal of the co-location pole and restoration back to the original conditions at the carriers’ expense.

### Small Cell Map

A Denver small cell location map is published online for your reference when selecting proposed Xcel Energy Co-locate sites that meet design guidelines. A link to the map is provided [here](#).

The information in this map is provided by applicants through the geodatabase submissions required above. Applicants must ensure the City has the most current and complete information for all locations, and it is important that applicants consult the map before preparing an application to minimize opportunity for location conflicts with other carriers. It should be noted that the City does not, and may not, reserve locations on Xcel Energy facilities. Only Xcel Energy can reserve a location on their facilities. The City is not responsible for identifying if a pole location has multiple applicants, as locations are provided by Xcel Energy on a first come/first serve basis with Xcel Energy application.