

DRAFT STAFF REPORT

MADISON COUNTY BOARD OF ZONING APPEALS

August 25, 2026

Petition Number: 2026-SU-009 and V-028, 029, 030
Location: 2187 E CR 300 N, Anderson, IN 46012; SP# 48-07-33-200-011.000-029
Petitioner: APC Towers
Owner: Dale Adams, ET Al
Zoning District: CR
Request: Special use and associated variances for a new 180 cell tower

2026-SU-009

Special Uses may be approved by the BZA only upon determination that the petition meets all the legal required criteria:

- The approval will not be injurious to the public health, safety, morals, and general welfare of the community.
- The requirements and development standards for the requested special use as prescribed by the Ordinance will be met.
- Granting of the Special Use will not subvert the general purposes served by the Ordinance and will not permanently injure other property or uses in the same district and vicinity.
- The proposed use will be consistent with the character of the zoning district in which it is located and the Madison County Comprehensive Plan.

The Board may examine the following items as they relate to the proposed use:

1. Topography and other natural site features;
2. Zoning of the site and surrounding properties;
3. Driveway locations, street access, and vehicular and pedestrian traffic;
4. Parking amount, location, and design;
5. Landscaping, screening, and buffering;
6. Open space and other site amenities;
7. Noise production and hours of operation;
8. Design, placement, architecture, and building materials of the structure;
9. Placement, design, intensity, height, and shielding of lighting;
10. Traffic generation;
11. General site layout as it relates to its surroundings.

LETTER OF INTENT



ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP

Robert B. See
Charles R. Graf
Frank D. Ott
John "Bart" Herriman
William W. Gooden
Russell L. Brown³
Travis W. Cohen
Michael P. Maxwell
Keith L. Beebe
John M. Meade
Jennifer F. Perry
Clark P. Kirkman
Kristin A. McKinnon
Olivia A. Healy
Kelly M. Shaffer

July 24, 2026

Madison County Board of Zoning Appeals
Planning & Development Department
16 East 9th Street
Anderson, IN 46016

Land Use Consultant
Elizabeth Bentz Williams, AIC
Joseph M. Csikos, AIC

RE: Letter of Intent: Special Use Application for Wireless Communications Facility
Property Address: 2187 E CR 300 N, Anderson IN 46012
Parcel ID: 48-07-33-200-011.000-029
Current Zoning: CR (Conservation Residential)
Applicant: APC Towers IV, LLC & Cellco Partnership d/b/a Verizon Wireless
By: Clark, Quinn, Moses, Scott, & Grahn, LLP

³Also admitted in Montana

⁴Also admitted in Kentucky

⁵Registered Civil Mediator

1. Executive Summary & Overview

APC Towers IV, LLC and Cellco Partnership d/b/a Verizon Wireless respectfully submits this application for a Special Use Permit to construct, operate, and maintain a new 180-foot wireless communications facility (WCF) on property located at 2187 E CR 300 N; Anderson IN 46012.

The primary objective of the proposed facility is to eliminate critical wireless coverage gaps, expand high-speed 4G/5G broadband capacity, and support emergency 911 telecommunications services for residents, businesses, and emergency responders in central Madison County.

2. Site Location & Facility Description

The subject property is an 8.00-acre parcel located along East County Road 300 North. The proposed site plan incorporates the following key design elements:

- **Tower Structure:** A 175-foot self-supporting monopole communications tower with a 5-foot lightning arrestor (180-foot overall height), designed to accommodate at least three (3) commercial wireless service providers as well as local emergency communications equipment.
- **Leased Compound Area:** A fenced ground compound measuring approximately (45' x 45'), within an overall 100' x 100' leased area designed to house ground equipment cabinets, fiber transport utilities, and a back-up power generator.
- **Security & Screening:** An 8-foot tall, 100% opaque, wooden shadowbox fence designed to meet the screening requirements within Section 6.18 of the Zoning Ordinance.
- **Access & Utilities:** Access to the compound will be provided via a proposed, 12-foot wide, gravel driveway connected to East County Road 300 North. Overhead/underground power and fiber connections will run along the designated access easement.

3. Public Necessity & Service Improvement

Reliable telecommunications infrastructure is an essential public utility. Wireless network usage in Madison County has increased substantially due to remote work, fixed home internet services, smart agricultural technology, and expanded public safety communications.

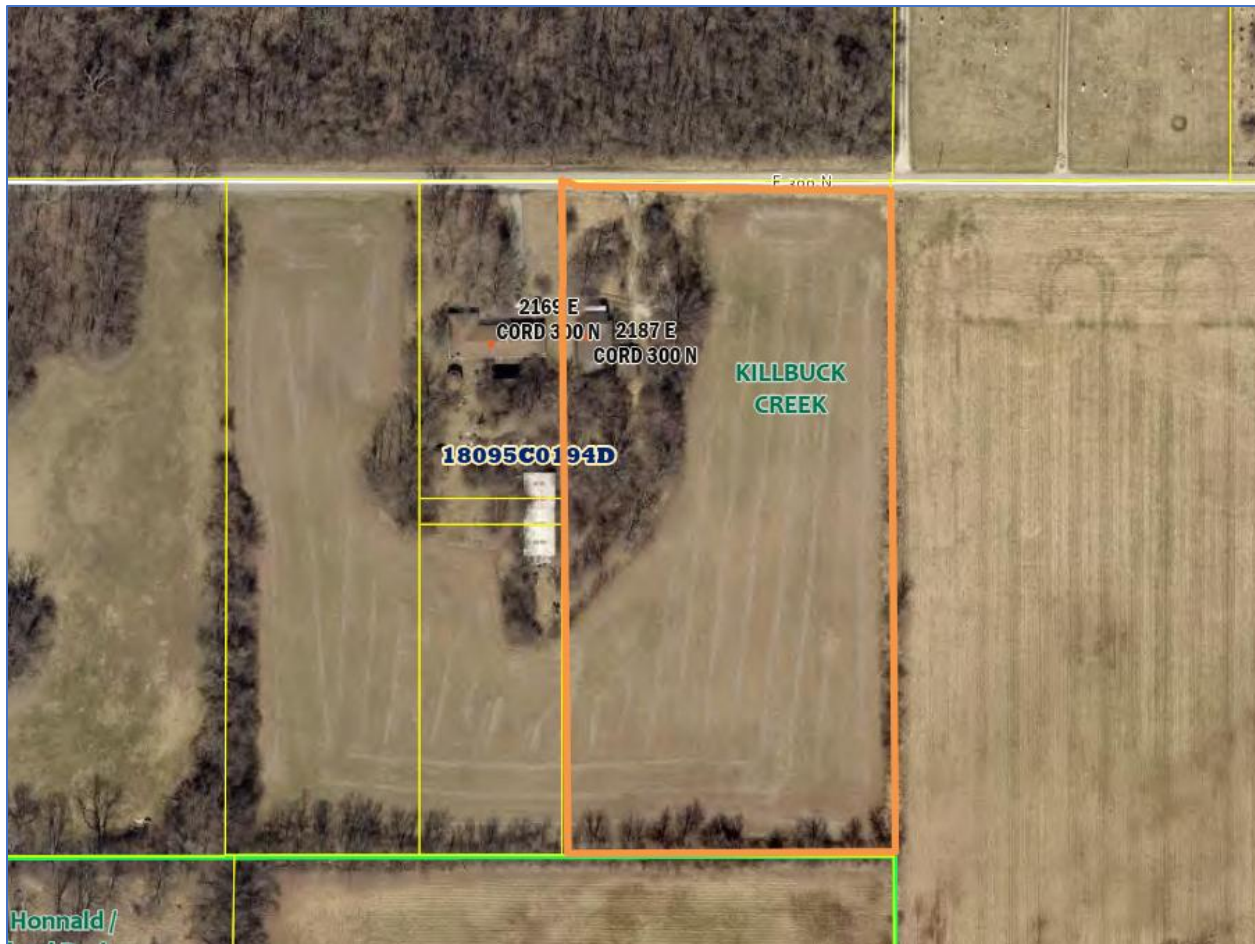
- **Coverage & Capacity Gap:** Propagation modeling confirms that the immediate surrounding area currently suffers from reduced signal strength, inconsistent in-building coverage and capacity bottlenecks. The proposed

180-foot height is the minimum height necessary to achieve line-of-sight propagation over surrounding topography and tree canopies.

- **Emergency 911 Services:** Over 80% of emergency 911 calls originate from wireless devices. Enhancing signal coverage in this area directly improves public safety response times and location accuracy.
- **Colocation Readiness:** To minimize the proliferation of towers in Madison County, the tower structure and compound are specifically engineered for multi-tenant colocation, allowing future wireless carriers to co-locate without constructing additional towers.

SITE INFORMATION

1. The area is zoned CR and has 5 acres. The petitioners live on the site and own the property immediately to the west.
2. The parcel is not located within a floodplain. The Oris Honnald/Highland Drain runs along the south board of the property.
3. Land use is generally agricultural and scattered residential housing.
4. The site fronts E 300 N, which is a local road in the county thoroughfare plan.



Vicinity

ZONING REQUIREMENTS

Telecommunication Facility Standards (TF)

6.18 Telecommunication Facilities Standards (TF)

TF-01: This Telecommunication Facility Standards section applies to the following districts:



The purpose of this section is to allow for the provision of adequate reliable public and private telecommunication service and to maximize the use of any transmission tower and tower site in order to reduce the total number of towers and locations needed to serve the telecommunications needs of the area; to minimize adverse, undesirable visual effects of towers through careful design, siting, and vegetative screening. All wireless telecommunication facilities shall meet the following provisions:

- A. **Required Approvals:** The placement of telecommunications facilities shall meet the following approval requirements as detailed in this section:
- The installation of new antenna on existing towers, including legal non-conforming towers, and existing alternative structures (such as water towers, buildings, or church steeples) may be approved by the Planning Director subject to conformance with all applicable requirements of this Ordinance.
 - The installation of new accessory structures to support the installation of antenna on existing towers or alternative structures may be approved by the Planning Director subject to conformance with the applicable requirements of this Ordinance.
 - The installation of new towers shall be approved either by the Planning Director as a permitted use or by the Board of Zoning Appeals as a special use consistent with the provisions of this section.
- B. **Determination of Tower Need:** Any proposal for a new telecommunications tower shall only be approved if the applicant submits verification that the antennas planned for the proposed tower cannot be accommodated on any existing or approved towers or structures within a 3 mile radius of the proposed tower location due to one or more of the following reasons:
- The antennas would exceed the structural capacity of the existing or approved tower or structure as documented by a qualified and licensed professional engineer, and the existing or approved tower, building, or structure cannot be modified to accommodate the proposed antennas.

TF-02: This Telecommunication Facility Standards section applies to the following districts:



Wireless telecommunications facilities shall require approval as a Special Use from the Board of Zoning Appeals and shall meet all the following requirements in addition to the general requirements and all other applicable provisions of this Ordinance:

- The tower shall be a monopole design, and shall be setback from any property line a distance equal to at least 100% the height of the tower. Towers shall not be permitted in any required front yard.
- The maximum height of the tower shall be 125 feet. The maximum height of any accessory structure shall be 15 feet.
- The fence enclosing the facility shall be opaque and of wood, brick, or stone construction. Opaque, 8 foot tall wooden gates, matching any wooden fence, or painted to match a fence of another material shall be provided to access the facility.

In Indiana, the maximum height for cell towers is generally 200 feet.
Here's a more detailed breakdown:

- **General Height:** Cell towers in Indiana typically range from 50 to 200 feet in height.

- **FAA Compliance:** All towers and antennas must comply with FAA tall structure requirements.
- **Small Cell Height:** Small cells, which are low-power, short-range radio antennas, can be mounted at heights of 50 feet or less.
- **Local Regulations:** While the state has laws limiting local government's ability to regulate small cell installations, local municipalities may have their own regulations regarding cell tower height.



cancer.org | 1.800.227.2345

Cell Phone Towers

The widespread use of cell phones in recent decades has led to a large increase in the number of cell phone towers (also known as **base stations**) being placed in communities. These towers have electronic equipment and antennas that receive and transmit cell phone signals using [radiofrequency \(RF\) waves](#)¹.

- [How do cell phone towers expose people to RF waves?](#)
- [Do cell phone towers cause cancer?](#)
- [What about 5G networks?](#)

Cell phone towers are still relatively new, and many people are understandably concerned about whether the RF waves they give off might possibly have health effects.

At this time, there's no strong evidence that exposure to RF waves from cell phone towers causes any noticeable health effects. However, this does not mean that the RF waves from cell phone towers have been proven to be absolutely safe. Most expert organizations agree that more research is needed to help clarify this, especially for any possible long-term effects.

American Cancer Society, 2020

Staff also contacted the Madison County Health Department. Their response follows.



Joseph Davis
To:  Lenny Strange
Cc:  Christopher Capshaw

 Reply

 Reply All

 Forward





Wed 3/19/2025 2:51 PM

RE: [EXTERNAL] CELL PHONE TOWER - 0 W ST RD 32, ANDERSON TN

Tough to say whether there are health risks from RF radiation from cell towers. Some studies say there aren't, and others say there are. Long term exposure research is lacking I think. Most sources say further research is needed. FCC says RF waves emitted by cell towers are well below safety guidelines. There's a link below to FCC FAQ on RF waves. American Cancer Society also has a good read regarding the cancer part. It doesn't address the other concerns though. I probably wouldn't want one right next to my house. It could be perfectly fine, but I wouldn't want it there just in case.

<https://www.cancer.org/cancer/risk-prevention/radiation-exposure/cellular-phone-towers.html>

Joe Davis
Deputy Administrator
Environmental Supervisor
Madison County Health Department
206 E 9th Street
Anderson, IN 46016
765-641-9537
jdavis@madisoncounty.in.gov



STAFF FINDINGS

The petitioner wishes to construct a new 180' overall monopole telecommunications tower and facility. The proposed tower will be in the center of the property. They are requesting variances from some development standards in the code and they have submitted engineer verification records substantiating the need for the facility and the coverage requirements. There have been arguments concerning the potential of cancer from exposure to cell towers. Review of American Cancer Society information and discussions with the health department do not support that argument. There has been no remonstrance as of the preparation of this report (8-19-2026). The site is fairly remote from concentrated residential development.

RECOMMENDATION

Staff recommends approval of the special use.

FINDINGS of FACT for SPECIAL USE

1. ***Would the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The operation is such that there should be no negative impact on the general welfare of the community.
2. ***Will the requirements and development standards set forth in the district for such exception be met?*** Yes. As presented, the existing improvements on the property meet the standards of the Madison County Land Use Development Code. All future improvements will be subject to the applicable development standards.
3. ***Will the proposed use subvert and permanently injure other property or uses in the same district and vicinity?*** No. As presented, and if the conditions detailed herein are met, no injury will occur to surrounding properties in the same district and vicinity.
4. ***Will the proposed use be consistent with the character of the zoning district and the Comprehensive (Comp) Plan?*** Yes. As presented, the conditions and the nature of the proposed project are consistent with the zoning code and comprehensive plan.

2026-V-028

STAFF FINDINGS

The petitioner is requesting relief from the landscaping requirements (6.18(D)(f)) to remove the requirement for evergreen tree landscaping surrounding the fence enclosure. The purpose is to take advantage of the natural screening in the area. The following is the statement from their letter of intent addressing this issue:

1. Landscaping Relief — Section 6.18(D)(f)

The Applicant requests relief from planting perimeter evergreen trees around the compound fence. Because the facility is situated in an active cultivated field directly adjacent to a dense, mature tree plot to the west and an established tree line to the east, ground-level views from the east and west are already naturally screened.

320 North Meridian Street, Suite 1100 · Indianapolis, IN 46204 · *ph* (317) 637-1321 · *fx* (317) 687-2344
www.clarkquinnlaw.com

Madison County Planning Commission
RE: Zoning Letter of Intent
June 19, 2026
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Furthermore, introducing non-native nursery trees along an active farm field boundary can interfere with agricultural tillage, drainage tiles, and farm equipment maneuvering. The proposed 100% opaque wood fence, combined with the existing tree lines, provides sufficient ground-level screening without taking additional farm acreage out of production or creating agricultural maintenance conflicts.

RECOMMENDATION

Staff recommends approval.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community. The proposed buffer will be sufficient given the adjoining land uses.
2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.
3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** Yes, they would not be able to construct the tower in a way that maximizes communication capacity.

2026-V-029

STAFF FINDINGS

The petitioner is requesting side yard setback relief to allow a reduced yard setback of 74' 5" rather than the required 180.' The structures are designed to collapse on themselves, so this setback reduction will should not pose a safety issue (verification letter is submitted with the file). From the letter of intent:

2. Side Yard Setback Relief — Section 6.18(TF-02)(A)

The Applicant proposes an eastern side yard setback of 74' 5", rather than the required 180' 0".

- **Preservation of Agricultural Land:** Placing the tower compound along the eastern edge of the field prevents splitting or bisecting the cultivated acreage, preserving the maximum amount of contiguous, farmable land.
- **Balanced Site Geometry:** Placing the tower 74' 5" from the eastern line allows the facility to maintain significant buffer distances from other key features, placing it 197 feet south of CR 300N and approximately 150 feet east of the wooded residential area to the west.
- **Engineered Breakpoint:** The monopole will feature an engineered breakpoint design. In the unlikely event of structural failure, the collapse radius is engineered to yield within a 70-foot radius of the base of the tower, keeping the fall zone safely contained within the subject parcel. The applicants have included a fall zone letter which is in compliance with Indiana Code §8-1-32.3-17 as evidence of this design.

RECOMMENDATION

Staff recommends approval.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community. The tower is designed to fall in on itself.
2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.
3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** Yes, they would not be able to construct the tower in a way that maximizes communication capacity.

2026-V-030

STAFF FINDINGS

The petitioner is requesting a tower higher than the county's maximum of 125'. The proposed tower height and design is within the parameters of other towers in Indiana. The petitioner is requesting a 180' tower (monopole plus lightning rod). The RF engineering studies provided demonstrate the need. The following is from their letter of intent:

The Applicant requests a facility height of 180 feet (monopole plus lightning rod) instead of the standard 125-foot limit in the CR district.

- **Overcoming Local Tree Canopy & Topography:** RF engineering studies confirm that a 125-foot tower cannot clear the tall, mature tree canopy present in the immediate area, including the heavy woodland directly west of the site causing severe signal attenuation in this area of Madison County.
- **Co-Location for Multiple Carriers:** A 180-foot tower provides sufficient vertical clearance for up to three (3) total wireless providers and emergency service communications, preventing the need for additional towers in neighboring areas.

RECOMMENDATION

Staff recommends approval.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community.
2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.
3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** Yes, they would not be able to construct the tower in a way that maximizes communication capacity.

Verification Letters



June 2nd, 2026

TO: Madison County Board of Zoning Appeals
16 E 9th St,
Anderson, IN 46733
PH: 260-724-5305

RE: Proposed Verizon Communications Facility
Site Name: GN3 Highland Middle
Type of Tower: New Monopole 180ft
Nearest Address: 2187 E 300 N, Anderson, IN 46012.

To whom it may concern:

As a radio frequency engineer for Verizon, I am providing this letter to state the need for the proposed Verizon site called GN3 Highland Middle ("Proposed Site") in Anderson, Indiana at the total requested height of 180 feet. The Proposed Site is necessary to improve coverage and offload 4G and 5G data and voice capacity in and around Anderson, Indiana ("Gap Area"). The Proposed Site will offload excess data traffic from the following nearby sites that are currently operating near or at capacity: GN Lindberg Road (located at 2635 Lindberg Road, Anderson, IN, 46012), GN Moonville (located at 6042 N CR 300 E, Anderson, 46012) and GN Anderson North (3257 N 100 W., Anderson, 46011). The Proposed Site will allow Verizon to address an area that is currently experiencing high demand for wireless high-speed data. Growth forecasts in and around the Gap Area have triggered the need for an additional site in order to allow Verizon to provide its customers in the area with the best experience on their existing 4G wireless devices and new 5G mobile and fixed home services. By addressing this need, customers will experience improved access to mobile voice services, enhanced 911 for public safety, and high-speed broadband 4G/5G wireless data services.

The requested overall tower height of 180 feet is the minimum height necessary to provide continuous coverage to the Gap Area and to ensure that the proposed site works well with other existing network sites in the surrounding areas. The proposed 180-foot tower will give Verizon the opportunity for growth on a structurally sound facility and allow for the possibility of new future collocators. A tower with a height less than 180 feet will not provide the coverage and capacity needed, and another new tower would be needed to provide additional coverage and capacity in the near future.

Verizon cares about the communities it serves and prefers to collocate on existing structures when feasible. Here, there are no existing towers in the search area that can provide Verizon the coverage and capacity needed in the Gap Area. The Proposed Site has been designed, and will be constructed and operated in a manner that satisfies regulations and requirements of all applicable governmental agencies that have been charged with regulating tower specifications, operation, construction, and placement, including the FAA and FCC.

RF emission readings at the Proposed Site in the accessible areas would be well below the applicable limits for FCC Uncontrolled/General Population and FCC Controlled/Occupational environments as outlined in 47 CFR 1.1301 through 1.1319. The site would carry appropriate RF emission signage to the public entering the site area.

This Proposed Site would transmit frequencies within the licensed frequency bands and the power limitations set by FCC regulatory authority. The Proposed Site will go through a complete rigorous regulatory process before it comes on-air to provide service to our customers.

Verizon currently holds multiple FCC licenses in Madison County in order to provide multiple forms of wireless services to its current and prospective customers.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Maldonado". The signature is written in black ink and is positioned above the printed name.

Jessica Maldonado

RF Engineer, Verizon

May 15, 2026

Jonathan Greene
APC Towers
8601 Six Forks Road, Suite 250
Raleigh, NC 27615



B+T Group
1717 S. Boulder, Suite 300
Tulsa, OK 74119
(918) 587-4630
btwo@btgrp.com

Subject:	Fall Certification Letter	
Arcosa Designation:	Arcosa Project Number:	C426
	Arcosa Site Name:	GN Highland Middle (IN-4079)
Engineering Firm Designation:	B+T Group Project Number:	26-002927
Site Data:	GN Highland Middle (IN-4079)	
	175' Monopole Tower	

To Whom it May Concern:

As Requested by Arcosa Telecom Structures on behalf of APC Towers, B+T Group is pleased to submit this "Fall Certification Letter" for the 175' Guyed tower to be constructed at the **GN Highland Middle (IN-4079)** site,

This pole will be designed in accordance with the TIA 222-H standard for Madison County, IN. The pole will be designed to support antennas and transmission lines for three wireless carriers. The design criteria are more particularly described as follows:

Design Wind Speed: 106 mph 3-sec gust (no ice), 40mph 3-sec gust (1.5" ice)
Structure Class: II
Exposure Category: C
Topographic Category: 1

170'—Wireless Carrier 1 (CaAa= 42,000 sq in w/ (18) 1 5/8" transmission lines
155'—Wireless Carrier 2 (CaAa= 30,000 sq in w/ (12) 1 5/8" transmission lines
140'—Wireless Carrier 3 (CaAa= 30,000 sq in w/ (12) 1 5/8" transmission lines

It is our understanding that this monopole will be designed such that, if a failure were to occur due to a significant storm or other event, the pole would fall within a radius of 70' from the base of the structure. Although the pole would not be designed to fail, stronger sections that required by analysis would be provided in the lower sections of the pole, resulting in an increased safety factor in the lower sections. In the highly unlikely event that this pole were to experience operational failure due to catastrophic wind loading, the design would enable the pole to fail through compression buckling. Failure in this manner would result in the upper portion of the pole buckling and folding over the lower portion, resulting in a fall radius of 70' from the base of the pole.

It should be understood that this opinion does not consider unpredictable extreme catastrophic events for which the structure is not designed. However, any damage to surrounding property caused by the pole failing during such an event would be relatively insignificant when compared to the damage caused to the surrounding property by the event itself.

Please contact us should you have any questions concerning the safety and design of the monopole.

Letter prepared by: Angela Ashwood

Submitted by: B&T Engineering, Inc.
Chad E. Tuttle, P.E.



Site Photos



View from site looking north



View from site looking east



View from site looking south



View from site looking west