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VIA Electronic Mail
Kelly O'Brien
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RE: New Cingular Wireless PCS, LLC's
Request for Modification of Requirements
Rooftop Telecommunications Facility at 527 Maple Ave East

Dear Ms. O'Brien:

I represent New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("Applicant") in an application to build a rooftop wireless facility (the "Facility") at 527 Maple Avenue East, Vienna, Virginia 22180, Pacel ID# 0382 09 0100 (the "Property"). As part of the application, the Applicant is proposing rooftop screening and antenna mounting structures that will extend beyond the nine-foot rooftop extension permitted by the "Structure Dimensions" in Sections 18-212.1.B and 18-212.1.C of the Town Code. Pursuant to Town Code Section 18-830.E, the Applicant respectfully requests that the Vienna Planning Commission and Town Council approve the requested modification of requirements.

I. PROPERTY INFORMATION

Address:	527 Maple Ave. East, Vienna, VA 22180
Property Owner:	Dukas Properties
Pacel ID #:	0382 09 0100
Deed Reference:	09226-1775
Jurisdiction:	Town of Vienna, Virginia
Zoning:	AE (Avenue East Gateway District) Commercial

II. AT&T'S NEED FOR IMPROVED WIRELESS SERVICES

AT&T intends to locate its antennas on the rooftop of the existing building on the Property. Verizon Wireless and T-Mobile already have antennas located on the rooftop of the building. AT&T has a significant need to bring both coverage and capacity to its network in the Town of Vienna. (*See* AT&T Current and Proposed Radio Frequency Coverage Maps attached as **Exhibit 1**). The rooftop Facility will bring new and improved emergency and non-emergency wireless coverage to this area of Vienna. (*See* Ex. 1). The proposed Facility will also provide FirstNet services. FirstNet is a nationwide high-speed broadband communications platform dedicated solely to America's first responders and emergency personnel. The federal government entered into an exclusive contract with AT&T to provide FirstNet services, and FirstNet is only available where AT&T has sufficient wireless coverage.

III. THE PROPOSED TELECOMMUNICATIONS FACILITY

The Property contains a commercial building that is home to several local businesses. There have been two prior applications to install telecommunications equipment and enclosures on the rooftop by Verizon Wireless and T-Mobile, which were approved in 2010 and 2016, respectively. Those rooftop facilities remain in place today. The Applicant will build a substantively similar Facility. The Property is an ideal location for the Facility because it is a commercial property – which is a preferred location for telecommunications antennas under the Comprehensive Plan (*See* 2015 Comp. Plan at 109) – and already has two existing telecommunications rooftop facilities on the building.

The Facility will include one screened platform for equipment structures; and two antenna arrays on the parapet of the building. (*See* Facility Site Plans in 8.5" x 11" attached as **Exhibit 2, at A-1**). The screened platform will be 15'-4" x 19'-1" will be located on the west corner of the rooftop (closest to Maple Ave E). (*See* Ex. 2 at A-1; S-5). The platform will be designed to blend into the existing parapet, and will have antennas, matching the building attached to the outside of the screen wall and building parapet. The screen wall will be of a color and material to match the current building façade. (*See* Photo Simulations attached as **Exhibit 3**). The proposed screen wall will extend 9'-8" above the existing rooftop, eight inches in excess of the nine (9) feet allowed to add roof structures under Town Code Sections 18-212.1.B and 18-212.1.C.

An antenna array will be mounted on the northside of the rooftop (closest to East Street SE), inside of a parapet screen wall that will match the existing façade and appear to be an extension of the existing rooftop by 10'-10". (*See* Ex. 2 at A-1, A-3; S-17). This requested extension is caused by the length of the antennas, and is 22 inches more than the allowed the nine (9) feet to add roof structures, such as parapets or antennas, under Town Code Sections 18-212.1.B and 18-212.1.C. However, the parapet screen wall will be even with the top of the existing Verizon and T-Mobile enclosures, and will not increase the height of the existing building and its current roof structures. A third antenna array will be mounted on the west side of the building, on the

existing parapet wall, with no structure required to blend into the existing façade and no increase in height of the rooftop. (*See* Ex. 2 at A-1, A-2; S-21).

The antennas and equipment platform will be screened and colored to match the existing building façade. (*See* Ex. 3, Photo Simulations). They are designed to mimic the existing Verizon and T-Mobile rooftop facilities from Verizon and T-Mobile. (*See* Ex. 3). The Facility will provide new and improved emergency and non-emergency wireless services in the Town of Vienna, without any adverse impacts to the surrounding area.

IV. REQUESTED MODIFICATION OF CODE'S REQUIREMENTS

Pursuant to Code Section 18-830, the Applicant is seeking minor relief from Code Sections 18-212.1.B and 18-212.1.C:

Structure	Allowed Extension	Requested Extension
West Platform Screen Wall	9'-0"	9'-8"
North Screen Wall	9'-0"	10'-10"

The proposed West Platform Screen Wall requires a height of 9'-8" above the existing rooftop. The top of the lower west side rooftop is 25'-2" – the requested extension would extend to 34'-10" above ground level. However, this extension will still be below the higher rooftop to the east, which extends to 37'-10". The proposed North Screen Wall will extend 10'-10" above the existing, higher eastern rooftop. However, it will be level with the existing Verizon Wireless and T-Mobile screen walls that already exist on the rooftop. The proposed extensions will not extend above the current height of the building and previously approved structures.

The Applicant looked extensively at reducing the height of the structures to avoid the modification request. However, the proposed antennas needed to bring adequate wireless service to this area cannot be accommodated without the requested height. The CCI TPA-45R-KU8A antennas to be mounted on the stealth structures each exceed eight feet in length. (*See* Ex. 2 Site Plans at S-3). In order to flush mount the antennas and provide space to accommodate the existing parapet, the screen walls must be the requested height in order to build the Facility and flush mount the antennas. If the requested modification is not granted, then the Facility cannot be installed to match the existing building façade. The proposed antennas and screen walls are nearly identical to the antennas and screen walls already installed in the rooftop by Verizon and T-Mobile.

The 2015 Comprehensive Plan supports there being "adequate telecommunications facilities" in Vienna. *See* 2015 Comp. Plan at 107. "These wireless telecommunications . . . should primarily be located in commercial and industrial zones and are discouraged in residential zones." *See* 2015 Comp. Plan at 107. The Comprehensive Plan indicates that the 400 and 500 blocks of Maple Avenue are encouraged locations for the location of telecommunications facilities. *See* 2015 Comp. Plan at Map A35.

Page 109 of the Comprehensive Plan states:

- The visual impacts of above ground facilities and any related structures should be minimized through the use of architecturally compatible design and materials, landscape plans, screening, and siting;
- Service providers should collocate their facilities to the maximum extent possible; and
- The construction of new telecommunications facilities in the form of monopoles or towers is strongly discouraged and should be considered only as a last resort.

The proposed Facility complies with these implementation standards. The Facility is designed to minimize its visual impact through the use of architecturally compatible design and materials, landscape plans, screening, and siting. The Property was chosen specifically because it is already home to two other rooftop telecommunications facilities. The proposed Facility will co-locate on the existing telecommunications Property in order to avoid the need to encumber an additional property or to build a new monopole or tower. Therefore, the proposed Facility is consistent with the goals and long-term planning set forth in the Comprehensive Plan.

The requested modification complies with the spirit and purpose of the Town Code. It allows the Applicant to co-locate its antennas on a building already being used for telecommunications facilities – preventing a new site from being necessary. Additionally, allowing the height modifications of just 8 and 22 inches will allow the Applicant to blend the Facility into the existing architecture to minimize visual impact to the extent possible. In short, the requested modifications are the minimum modifications necessary to achieve the Applicant's goal to bring new and improved emergency and non-emergency wireless services to Vienna, without a new facility, and with a minimal impact on the local community.

Please let me know if you require any additional information. I look forward to presenting our application at an upcoming public hearing. Please contact me directly with any questions or concerns. I can be reached at [redacted] or [redacted]

Sincerely,

Douglas A. Sampson

DAS
w/ enclosures