

**Project Narrative in Support of Application to Board of Architectural Review for Rooftop
Telecommunications Facility at 527 Maple Avenue East, Vienna, Virginia 22180**

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

Pursuant to Sections 4-11 and 18-814 of the Vienna Town Code, effective September 29, 2025 (the “Code”), New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (“Applicant”), by its agents Saul Ewing LLP and Smartlink Group, LLC, requests the Town of Vienna’s Board of Architectural Review (“BAR”) approve the Applicant’s application to build a rooftop wireless facility (the “Facility”) at 527 Maple Avenue East, Vienna, Virginia 22180, Parcel ID# 0382 09 0100 (the “Property”). A rooftop telecommunications wireless facility is a permitted use in the AE Avenue East Gateway Zoning District.

The Applicant respectfully requests a determination by the BAR that the proposed Facility is in substantial compliance with the Code and approve: (1) the requested height modification for the structures to extend 9’-8” and 10’-10” above the existing rooftop, in excess of the allowed nine feet under the Code; and (2) the exterior modifications and architectural design of the Facility.

This document and attached Exhibits provide justification for the Facility, and a summary of how and why this proposal conforms with the Code, the Comprehensive Plan, and the Town’s Architectural Guidelines. This package and additional or clarifying evidence, to be presented at a public hearing, provide the legal and factual support to approve this request.

EXHIBITS

Exhibit 1	AT&T Current and Proposed Radio Frequency Coverage Maps
Exhibit 2	FirstNet Information Sheet
Exhibit 3	Applicant Authorization Form
Exhibit 4	Proposed Facility Site Plans in 8.5" x 11"
Exhibit 5	Photo Simulations of Proposed Facility

I. AT&T'S GOALS AND NEED FOR IMPROVED WIRELESS SERVICES

There is a significant need for new and improved wireless and broadband services in this portion of the Town of Vienna. AT&T intends to locate its antennas on the rooftop of the existing building on the Property. Verizon Wireless and T-Mobile each already have antennas located on the rooftop of the building. AT&T has a significant need to bring both coverage and capacity to the Town of Vienna, including along the Maple Avenue corridor, bringing new and improved wireless services to areas including James Madison High School, Cunningham Park Elementary School, and several area parks and recreation facilities. (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. (See AT&T First Net Information Sheets attached as **Exhibit 2**).

Ultimately, the Facility will allow residents, visitors, businesses and emergency personnel of Vienna to experience adequate wireless services, better quality calls, and diminished dropped calls.

II. PROPERTY AND CURRENT USE

The Property is owned by Dukas Properties, L.L.C., which has authorized Applicant and its agents to pursue this Conditional Use, and any other zoning relief, building permits, or applications required for the Facility. (See Applicant Authorization Form attached as **Exhibit 3**). The Property is zoned AE (Avenue East), and its current use is commercial – “commercial low rise office.” A rooftop telecommunications facility is permitted with a Conditional Use Permit (“CUP”). There have been two prior applications for CUPs to install telecommunications equipment and enclosures on the rooftop by Verizon Wireless and T-Mobile. Both were approved, in 2010 and 2016, respectively, and subsequently installed. Those rooftop facilities remain in place today. The Applicant seeks a CUP for a substantively similar facility.

The owner operates a commercial building on the property that is home to several local businesses. 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 existing telecommunications rooftop facilities on the

building. By allowing this additional co-location rooftop facility, the new structures will blend in with the structures already in existence on the rooftop. Further, allowing an additional co-location here will prevent an additional building or property being encumbered by telecommunications antennas.

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 4, 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. 4 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 5**). 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. 4 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. 4 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. 5, Photo Simulations). They are designed to mimic the existing Verizon and T-Mobile rooftop facilities from Verizon and T-Mobile. (*See* Ex. 5). 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.

The Facility will be unmanned, free of public facilities, and only require occasional visits (about 1 visit per quarter) from a technician for routine inspections and maintenance. The Facility will have no impact on local traffic. The Facility will have no adverse impact on the health, safety,

or welfare of residents or workers in the area. The Facility will be free of odors, fumes, light, glare, and noise. The Facility will not be located within any airport or historic overlay districts.

IV. COMPATIBILITY WITH THE COMPREHENSIVE PLAN

The 2015 Comprehensive Plan supports there being “adequate telecommunications facilities” in Vienna. *See* 2015 Comp. Plan at 107. “These wireless telecommunications facilities may be located on private or public property in the Town, including rights-of-way, subject to approval of a conditional use permit, as required by the Town Code. They 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. (*See Ex. 6*). 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 Town of Vienna Comprehensive Plan.

V. REVIEW BY BOARD OF ARCHITECTURAL REVIEW

A rooftop telecommunications wireless facility is a permitted use in the AE Avenue East Gateway Zoning District. This Property was specifically chosen because it already has two wireless providers located on the existing rooftop. Pursuant to Sections 4-11 and 18-814 of the Town of Vienna Zoning Code the Applicant requests BAR’s review and approve: (1) the requested height modification for the structures to extend 9’-8” and 10’-10” above the existing rooftop, in excess of the allowed nine feet under the Code; and (2) the exterior modifications and architectural design of the Facility.

A. Requested Modification of Code’s Rooftop Height 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	Requested	Deviation
West Platform Screen Wall	9'-0"	9'-8"	8"
North Screen Wall	9'-0"	10'-10"	22"

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 on the rooftop by Verizon and T-Mobile.

The requested height 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.

B. Requested Exterior Modifications & Architectural Design of Facility

The Facility is designed to blend into the existing building façade. The Facility will include one screened platform for equipment structures; and two antenna arrays on the parapet of the building. (*See Ex. 4, Site*). 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. 4 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.

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. (*See Ex. 4 at A-1, A-3; S-17*). 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. Instead, the antennas will be designed to match the existing building façade and will be flush mounted to the building. (See Ex. 4 at A-1, A-2; S-21).

The Applicant created a visual impact survey of the proposed rooftop Facility. (See Ex. 6, Photo Simulations). The antennas and equipment platform will be screened and colored to match the existing building façade. The antennas will be of a color and material to match the existing building and/or parapet. The screening for the platform, will be designed to match the exterior. There are already equipment structures existing on top of the building that are visible, and the additions from the Facility will not increase the height of the existing building. They are designed to mimic the existing Verizon and T-Mobile rooftop facilities from Verizon and T-Mobile. (See Ex. 6). 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.

On October 25, 2025, the Applicant met with the BAR, Planner Sharmaine Abaid, and Deputy Planning Director Kelly O'Brien during a BAR work session to discuss the proposal. During the work session, the following comments were provided, which the Applicant will respond to:

Show a site key on every page to show which elevation is being referenced

- **Applicant's Response:** The site plans have been updated. (See Ex. 4).

Update the renderings to show current and proposed

- **Applicant's Response:** New photo simulations were created following the work session, to show the proposed exterior to the finish of the rooftop enclosures will be designed to match the existing brick façade of the building. Existing and proposed views are provided. (See Ex. 5).

Updated renderings should be color

- **Applicant's Response:** The attached photo simulations are provided in color. (See Ex. 5).

Push the enclosure back 2-4 feet by cantilevering structural.

- **Applicant's Response:** The Applicant reviewed a potential option to cantilever the enclosure located at the front (west corner) of the building to move the enclosure 2-4 feet back from the existing façade. The Applicant determined the entire parapet of the roof would need to be redesigned and structurally reinforced in order to cantilever the platform. It was also determined that there was a significant risk that the structural reinforcements would make the roofline on the front of the building look uneven. This option is not structurally, economically, or aesthetically viable. Additionally, the landowner did not want structural changes made to the building, rooftop, or parapet. It was determined that

locating the enclosure at the edge of the rooftop, flush with the existing façade, provided sufficient structural integrity and aesthetics.

Possible brick façade for the enclosure to match the color of the building's brick façade

- **Applicant's Response:** The Applicant intends to adapt the exterior of the enclosures to match the building's brick façade. The photo simulations were updated to show the proposed exterior of the rooftop enclosures. (See Ex. 5).

Bubble in red the proposed changes / additions

- **Applicant's Response:** The Applicant did not make any structural revisions to the site plans and designs, for the reasons discussed herein. A clean version of the site plans with requested revisions is attached. (See Ex. 4).

Is it possible to only show the antenna and now have the enclosure Color options with the renderings

- **Applicant's Response:** New photo simulations were created following the work session, to show the proposed exterior to the finish of the rooftop enclosures will be designed to match the existing brick façade of the building. (See Ex. 5).

Reduce visual impact of enclosure (lower the height, reduce the size, push it back from the front façade several feet)

- **Applicant's Response:** The Applicant considered each of these suggestions. As discussed in the height modifications section, due to the size of the antennas, the enclosures cannot be reduced in height. The enclosures are designed not to exceed the existing structures from T-Mobile and Verizon Wireless already on the rooftop. The front equipment enclosure (west corner) cannot be moved back from the façade of the building for structural and aesthetic reasons. The Applicant has determined that the proposed Facility, as designed, is the most efficient and only feasible design to build the Facility to the rooftop and meet AT&T's needs to bring now and improved emergency and non-emergency wireless and broadband services to Vienna.

Why does the structure need to be on the front corner (question for the structural engineer)

- **Applicant's Response:** The Applicant's structural engineer completed a thorough review of the building and its structural components. Platforms with rooftop equipment are ideally placed over an existing support column in a building to ensure structural capacity and stability with the added weight of the equipment. T-Mobile and Verizon Wireless equipment platforms are located over such structural columns on the back (east) side of the building. There are no remaining structural columns available over which the Applicant could locate its equipment platform on the back side of the building. The front (west) corner of the building was chosen because it had sufficient roof space for the square footage of the equipment platform and is located over a structural support column within

the building to provide adequate structural support and stability. In short, the location was chosen as the only remaining space on the rooftop that had sufficient space and structural support for the equipment platform.

VI. CONCLUSION

The Applicant respectfully requests that the Town or Vienna Board of Architectural Review approve: (1) the requested height modification for the structures to extend 9'-8" and 10'-10" above the existing rooftop, in excess of the allowed nine feet under the Code; and (2) the exterior modifications and architectural design of the Facility. We look forward to presenting this and additional information as necessary at an upcoming hearing, and improving the wireless services for the residents, businesses, and visitors to the Town of Vienna. If you need further information, please contact our zoning attorney Doug Sampson at 410-332-8661 or douglas.sampson@saul.com.