



November 16, 2010

Fairfax County
Department of Planning and Zoning, Zoning Division
Herrity Building
12055 Government Center Parkway, Suite 730
Fairfax, VA 22035

RE: STATEMENT OF JUSTIFICATION

T-Mobile Northeast LLC

Request for Determination under Virginia Code Section 15.2-2232

Site Address: 5419 Oakwood Road, Alexandria, VA 22310

Parcel ID#: 0812 03 0033

Zoning: C-3 (Office District)

Use: Vacant Land

Supervisor District: Lee

Pursuant to Section 15.2-2232 of the Code of Virginia and in accordance with the provisions of the adopted Comprehensive Plan, T-Mobile Northeast LLC, hereby requests a determination that the proposed wireless telecommunications facility, which consists of installation of a new 125' high "monopine" and new compound located at 5419 Oakwood Road, Alexandria, is in substantial accordance with the provisions of the adopted Comprehensive Plan. A monopole is a permitted use in all C-3 districts, per Sec. 2-514.3(A)(1) of the Fairfax County Zoning Ordinance.

Applicant:

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Location of Property:

Use: Vacant Land
T-Mobile #: WAC408B (Oakwood Road Limited)
Site Address: 5419 Oakwood Road
Parcel ID#: 0812 03 0033
Zoning District: C-3
Supervisor District: Lee



1. Description of Proposed Use:

T-Mobile Northeast LLC, hereby requests a determination that the proposed wireless telecommunications facility for installation of a new 125' high monopine and ancillary ground equipment located at 5419 Oakwood Road, Alexandria, is in substantial accordance with the provisions of the adopted Comprehensive Plan, a monopole is a permitted use in all C-3 districts, per Sec. 2-514.3(A)(1) of the Fairfax County Zoning Ordinance.

As shown on the plans, the proposed 125' pole will be located in the existing cleared area of the vacant parcel and will accommodate up to two (2) additional wireless providers. A monopole is a permitted use in all C-3 districts, per Sec. 2-514.3(A)(1) of the Fairfax County Zoning Ordinance.

The proposed 125' monopine will accommodate T-Mobile Northeast LLC at an antenna centerline of 119' with the top of the nine (9) panel antennas at 121.9'. Each T-Mobile panel antenna is 59" high, 11.9" wide and 6.3" deep. A proposed 1,225 square foot compound will be provided at the base of the monopole, surrounded by an eight (8) foot tall board on board wooden fence. T-Mobile Northeast LLC will install a 10' x 20' concrete pad inside of the compound, and up to three (3) equipment cabinets on the concrete pad inside of the proposed compound area. Each equipment cabinet measures approximately 64" tall by 51.25" wide by 37" deep. As part of the proposed compound area, a fenced utility area will be installed for installation of new electrical and telephone service. As stated earlier, the proposed compound area will be screened by an eight (8) foot tall board on board fence.

The proposed facility will be designed to provide for at least two (2) additional carriers, subject to future 2232 review. The proposed facility will be unmanned and will operate around the clock, 365 days per year. Routine maintenance will occur once or twice per month, performed by a service technician driving a standard sized vehicle.

The proposed facility will operate as a base station for T-Mobile's telecommunications network. T-Mobile's network operates with transmitting frequencies between 1965-1975 and 2135-2145 megahertz, and receiving frequencies between 1735-1745 and 1885-1895 megahertz. The proposed use is passive and will not generate any noise, lights, dust, glare, vibrations, fumes or odors. The only traffic generated will be the roughly once a month routine maintenance visits. The proposed use poses no threat to the public health safety or welfare and will not impact radio, television or telephone reception. It will have no impact upon the air and water quality nor will it impact any existing environmental features of the subject property.

2. Requirement of Proposed Use:

The proposed facility is a vital component of T-Mobile's area-wide wireless telecommunications network. Because wireless communications facilities operate at low power levels, wireless service providers such as T-Mobile must locate antenna sites



according to a network design based on interconnecting cells (coverage areas) so that a wireless call can be seamlessly handed off from one wireless communications facility to the next as a user travels throughout the area. Without a sufficient number of wireless communications facilities, calls will drop and disconnect as the user approaches the outer limits of a cell. In order to achieve maximum efficiency from each wireless communications facility in the network, the carrier attempts to locate wireless communications facilities at optimum locations within each cell so that it can attain the broadest pattern of signal distribution and the widest possible spacing between its wireless communications facilities.

Dropped calls are not only an inconvenience and an annoyance for mobile phone users, but a network with significant gaps in coverage also diminishes the important emergency services component of wireless telephone service. Signal quality and network access are what matter most to wireless users. T-Mobile has limited coverage in the area to the south of the proposed wireless communications facility and by building the proposed communications facility, will be able to improve coverage.

T-Mobile is licensed by the Federal Communications Commission to provide telecommunications service in Fairfax County. The proposed facility is necessary in order to mount the antennas at heights sufficient to service the intended coverage area and to provide for proper hand-off to the adjacent antenna facilities in the network.

This site will serve to both close coverage gaps and relieve the number of dropped calls for adjacent sites. As depicted on the submitted coverage maps the proposed facility will provide in-building residential coverage to the areas near and around the subject property including the residential neighborhood to the south of the proposed facility. Specific areas of coverage will include the area between I-95 to the north, Franconia Road to the south, Brookview Drive to the west and Habersham Way to the east.

ANTICIPATED IMPACTS ON ADJOINING PROPERTIES

The proposed facility will have no impact as to traffic or parking as the facility will be unmanned and will not generate traffic. Due to the location of the monopole on the commercial parcel, the existing and surrounding vegetation, and the "monopine" design which is built to resemble a tree, visual impacts will be minimal. There will be no perceptible noise generated by the facility. There will be no interference with electronic equipment for telephone, television, radio or other electronic uses.

RELATIONSHIP OF THE PROPOSAL TO THE COMPREHENSIVE PLAN

The proposed facility is consistent with and furthers the goals the Fairfax County Comprehensive Plan. The proposed monopole would not be located on



publicly owned property, it is however designed for multiple carriers and would be located and designed so as to have minimal visual impact on homes and the view from public thoroughfares. The location, character and extent of the application should be found to be in substantial accord with the Comprehensive Plan

The application is also consistent with the objectives found under the Policy Plan of the Comprehensive Plan concerning "Mobile and Land-Based Telecommunication Services as shown below. *Italicized text indicates Applicant's response to the standards.*

FAIRFAX COUNTY COMPREHENSIVE PLAN, 2007 Edition POLICY PLAN Public Facilities, Amended through 1-10-2005

MOBILE AND LAND-BASED

TELECOMMUNICATION SERVICES

Mobile and land-based telecommunication services provide for the wireless transmission of voice and data and include cellular and personal communications services (PCS), paging and wireless internet services and mobile radio. These services operate from wireless networks that are dependent on antenna devices and related equipment to transmit from a sender to one or more receivers. Such services are viewed as public utility service providers that benefit the community and its economic growth and vitality. The objectives and policies set forth in this section provide guidance on siting and design issues and are used in evaluating land use applications. They should not be interpreted as superseding or amending any requirements of the Zoning Ordinance or other local, state and Federal laws pertaining to these issues.

GENERAL GUIDELINES

Objective 42: In order to provide for the mobile and land based telecommunication network for wireless telecommunication systems licensed by the Federal Communications Commission, and in order to achieve opportunities for the collocation of related facilities and the reduction of their visual impact, locate the network's necessary support facilities which include antennas, monopoles, lattice towers and equipment buildings in accordance with the following policies.

Policy A: Avoid the construction of new structures by locating mobile and land-based telecommunication facilities on available existing structures such as building rooftops, telecommunication and broadcast poles and towers, electrical utility poles and towers, and water storage facilities when the telecommunication facilities can be placed inconspicuously to blend with such existing structures.



T-Mobile's response:

- *T-Mobile was unable to find any property owners with buildings of sufficient height in the search area who were willing to lease space and which would meet the required coverage objective.*

Policy B: Locate new structures that are required to support telecommunication antennas on properties that provide the greatest opportunity to conceal the telecommunication facilities and minimize their visual impact on surrounding areas.

T-Mobile's response:

- *T-Mobile Northeast LLC located the proposed facility on a Commercially Zoned parcel consistent with Sec. 2-514.3(A)(1) of the Fairfax County Zoning Ordinance, to mitigate the visual impact and to maximize the distance from residential properties.*
- *The existing trees located on the subject parcel will minimize the visual impact of the proposed pole and along with the proposed eight (8) foot tall board on board fence will screen the view of the bottom portion of the proposed pole and the proposed equipment at the base of the pole from any properties in the area. Also, the facility will be of "monopine" design, which is built specifically to blend into surrounding vegetation.*

Policy C: Subject to the availability and feasibility of a public site, when multiple sites have equal opportunity to minimize impacts, consider public lands as the preferred location for new structures.

- *No public properties were considered appropriate or feasible within the search ring either due to their distance from the ring (I-495), their relatively small size and proximity to homes (Bush Hill Park & Mark Twain Park), their proximity to existing sites (WMATA Metro rail station) or their relatively low topography.*

Policy D: Locate mobile and land based telecommunication facilities on public property only after a lease agreement between the County, or related board or authority, and service provider has been established.

- *No public properties were pursued for leasing.*

Policy E: Locate mobile and land-based telecommunication facilities operated by different service providers on single sites and/or structures whenever appropriate. Locate single-use structures on a property when a collocation structure for multiple service providers is not desirable or feasible due to site limitations or visual impact concerns.



T-Mobile's response:

- *The proposed monopole will be designed and made available for up to two (2) additional telecommunication carriers.*
- *Given the standard ten (10) foot vertical separation between antennas, space is available at one hundred and nine (109) feet and ninety nine (99) feet AGL.*
- *Space for future carriers' related equipment is shown within the proposed twelve hundred and twenty five (1225) square foot compound.*

Policy F: Ensure that the height of towers and monopoles has the least visual impact and is no greater than required to achieve service area requirements and potential collocation, when visually appropriate.

T-Mobile's response:

- *The height of the proposed monopole is the minimum required to satisfy T-Mobile's coverage objectives. Coverage maps are included showing the current on-air coverage and projected coverage with site at the proposed height of 125'. The proposed height will allow for a two (2) additional telecommunication carriers to install with sufficient elevations to provide effective coverage in and around the area, reducing the need for additional structures in the immediate area.*

Policy G: Ensure that the use of public property by mobile and land based telecommunication facilities does not interfere with the existing or planned operational requirements of the public use.

- *This Policy appears to be inapplicable to the instant request.*

Policy H: Design, site and/or landscape mobile and land-based telecommunication facilities to minimize impacts on the character of the property and surrounding areas. Demonstrate the appropriateness of the design through facility schematics and plans which detail the type, location, height, and material of the proposed structures and their relationship to other structures on the property and surrounding areas.

T-Mobile's response:

- *Schematic drawings have been submitted with this application demonstrating the appropriateness of the site for the proposed facility without impacting the character of the nearest residential and surrounding properties. See page Z-1 of the enclosed drawings. The enclosed photos of the parcel show the appropriateness of the proposed facility. The distances from the proposed monopine to the property lines are indicated on the enclosed page Z-1 of the drawings submitted with the application package; the closest property zoned*



residential is over one hundred and fifty two (152") feet to the west, and the proposed monopole will not be prominent or overbearing.

Policy I: Demonstrate that the selected site for a new monopole and tower provides the least visual impact on residential areas and the public way. Analyze the potential impacts from other vantage points in the area to illustrate that the selected site provides the best opportunity to minimize the visual impact of the proposed facility.

T-Mobile's response:

- *The enclosed photos of the parcel demonstrate that the existing trees will minimize the visual impact of the selected site. The need for a Height Test for photo simulations to be determined and coordinated with staff.*

Policy J: Mitigate the visual impact of proposed telecommunication structures, and their antennas and ancillary equipment, using effective design options appropriate to the site such as:

- **Locating facilities near to or within areas of mature vegetation and trees which effectively screen or provide an appropriate setting for the proposed structure or which, when viewed in context, considering perspective views, relative topography and other factors, mitigate their visual presence and prominence;**
- **Blending facilities with an existing pattern of tall structures;**
- **Obscuring or blocking the views of facilities with other existing structures, vegetation, tree cover, or topographic features to the maximum extent feasible**
- **Increasing the height of or replacing existing structures to reduce the need for another structure when such height increases or structure replacements are appropriate to the site and the surrounding area.**

T-Mobile's response:

- *The existing vegetation will screen the proposed tower in conjunction with its monopine design and the chosen location. An eight (8) foot tall wooden fence will conceal the equipment compound area.*
- *The proposed one hundred sixty (125) foot monopole will allow for future utilization by up to two (2) additional telecommunication carriers, thereby reducing the need for other similar structures.*

Policy K: Locate telecommunication facilities to ensure the protection of historically significant landscapes. The views of and vistas from architecturally and/or historically significant structures should not be impaired or diminished by the placement of telecommunication facilities.



T-Mobile's response:

- *The proposed use will not alter any historically significant landscapes or any views from the architecturally or historically significant structures. A Section 106 report has been ordered and will be submitted as soon as it is received.*

Policy L: Site proposed facilities to avoid areas of environmental sensitivity.

T-Mobile's response:

- *The proposed use will not impact any environmentally sensitive areas. Prior to commencement of construction a geotechnical study will be done to confirm the soil type and the monopine caisson will be designed as appropriate to ensure conformance with structural codes.*

Policy M: Site proposed facilities to allow for future expansion and maintain levels of screening to accommodate expansion.

T-Mobile's response:

- *As noted previously, the proposal will allow for future expansion of up to two (2) additional carriers.*
- *The proposed compound area will be enclosed by an eight (8) foot board on board fence to mitigate the visual impact of the T-Mobile equipment cabinets. The proposed compound size of 1225 square feet will allow ground space for two additional carriers within the proposed fenced compound.*

Policy N: Design and site proposed facilities to preserve areas necessary for future right-of-way dedication and ancillary easements for construction of road improvements.

T-Mobile's response:

- *The proposed location is over thirty two (32) feet from the nearest public road right-of-way, thereby allowing sufficient room for future right-of-way expansion and easements for road improvements.*

Policy O: Locate and construct antennas used for purposes other than mobile and land-based telecommunication services in accordance with the same guidelines established in this "Mobile and Land-Based Telecommunications Services" section.

T-Mobile's response:

- *This Policy appears to be inapplicable to the instant request.*

Objective 43: Design telecommunication facilities to mitigate their visual presence and prominence, particularly when located in residential areas, by concealing their



intended purpose in a way that is consistent with the character of the surrounding area.

Policy A: Disguise and camouflage the appearance of telecommunication facilities so as to resemble other man-made structures and natural features (such as flagpoles, bell towers, and trees) that are typically found in a similar context and belong to the setting where placed;

T-Mobile's response:

- *The parcel's existing vegetation will mitigate the visual presence and prominence of the proposed 125' tower. The tower's "monopine" design will also aid in its resemblance to natural features.*

Policy B: Design telecommunications facilities that are disguised and camouflaged to be of a bulk, mass and height typical of and similar to the feature selected;

T-Mobile's response:

- *The proposed facility makes appropriate use of the existing features of the subject property and balances the use of the subject property, the use and enjoyment of the nearby residences, with the objectives of the Fairfax County comprehensive Plan in providing for adequate telecommunication services, the ability for future co-location, and eliminating the need for future telecommunication structures in the immediate area.*

Policy C: Use appropriately other new and existing structures and vegetation of comparable form and style to establish a grouping that complements a camouflaged telecommunication facility and supports its design, location and appearance.

T-Mobile's response:

- *The proposed equipment compound will be screened from public view by an eight (8) foot board on board fence, and the tower itself will be of the camouflaged, "monopine" design.*