

**Application for Determination
Pursuant to
Section 15.2-2232, Code of Virginia**

Part II: Statement of Justification

Applicants

T-Mobile Northeast LLC
12050 Baltimore Avenue
Beltsville, Maryland 20705

Co-Applicant

Milestone Communications
1890 Preston White Drive
Suite 103
Reston, Virginia 20191

Site location

Address: 6525 Montrose Street
Parcel: 0723 01 0014
Zoning District: R-2
Use: Facilities, governmental and institutional.
Supervisor District: Mason

Description of Proposed Use

Pursuant to Section 15.2-2232 of the Code of Virginia, T-Mobile Northeast LLC (T-Mobile) and Milestone Communications request that the proposed 115' high monopole located at Holmes Middle School, 6525 Montrose Street, be approved.

Milestone Communications is negotiating a lease agreement with Holmes Middle School and will lease space at the proposed site to T-Mobile. The proposed 115' monopole will accommodate up to four (4) additional wireless providers. The description of the communications facility is described on the Site Plan drawing entitled "Holmes Middle School" and prepared by Entrex Communications Services, Inc. dated September 9, 2010.

The proposed 115' monopole will accommodate T-Mobile at a Rad Center of 112' with six (6) panel antennas. The antennas will be 59" high, 11.9" wide and 6.3" deep. A proposed 98' by 30' compound will be provided at the base of the monopole and surrounded by an 8' tall wood fence with a combination (8 total) of 6' high red cedar and Eastern Arborvitae (white cedar) trees added as supplemental screening. T-Mobile will install a ten 10' by 20' concrete pad within the compound with up to three (3) equipment cabinets installed inside of the proposed compound. The equipment cabinets will measure no more than 64''H x 51''W x 37''D.

The proposed facility will be designed to provide for at least four (4) additional carriers. 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 and be performed by a service technician driving a standard sized vehicle.

The proposed facility will operate as a base station for T-Mobile's wireless telecommunications network that operates with transmitting frequencies between 1965 and 1975 megahertz and receiving frequencies between 1885 and 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 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.

Requirement of Proposed Use

The proposed facility is a vital component of T-Mobile's area-wide wireless telecommunications network. Because wireless telecommunications 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 facility to the next as a user travels throughout the area. Without a sufficient number of 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 telecommunications facility in the network, the carrier attempts to locate the facilities at optimum locations within each cell so that it can attain the broadest pattern of signal distribution and the widest possible spacing between them.

Dropped calls are more than an inconvenience and an annoyance for mobile phone users. A network with significant gaps in coverage cannot support the important emergency services component of wireless telephone service. Wireless subscribers depend on strong signal strength and broad network access. T-Mobile has minimum coverage in the area surrounding the proposed wireless telecommunications facility and by building the proposed communications facility would be able to provide enhanced coverage. See attached propagation maps for better detail.

Anticipated Impacts on Adjoining Properties

The proposed facility would have no impact on traffic or parking as the facility would be unmanned and would not generate traffic. Because the monopole would be located on a large parcel, the visual impact would be minimal. There would 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 Proposed Facility to the Comprehensive Plan

The proposed facility is consistent with and furthers the goals the Fairfax County Comprehensive Plan. The proposed monopole would be located on publicly-owned property, designed for multiple carriers and be situated to minimize visual impact. The proposed site should be found to be in substantial accord with the Comprehensive Plan. The proposed facility is also consistent with the objectives of the Policy Plan of the Comprehensive Plan concerning mobile and land-based telecommunication services as described below.

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.

Due to the residential character of the properties within the search area and the proximity of other T-Mobile sites immediately outside of this search area, there are no better alternatives that T-Mobile could have pursued.

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.

The proposed site is 28 acres and one of the largest publicly owned tracts of land within the T-Mobile search ring. Further, Milestone Communications and T-Mobile met with Fairfax County Public School representatives and jointly agreed proposed site is the best location. The school building itself will help to screen the view of the bottom portion of monopole.

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.

The subject property is a public property owned and operated by the Fairfax County Public School Board. Further, proposed monopole is designed as a "low-profile" structure whereas the antennas are flush mounted to the monopole making their appearance not as visible as a full array monopole structure.

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.

T-Mobile has entered into a lease agreement with Smartpole, Inc., on behalf of the Fairfax County School Board.

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.

The proposed monopole will be designed and made available for up to four (4) additional telecommunication carriers. Given the standard ten-foot vertical separation between antennas, space is available at 102', 92', and 82' and 72' AGL. Sufficient space for future carriers' related equipment

will be located at the base of the monopole and screened from view by an 8' high board-on-board fence with 6' high red cedar and Eastern Arborvitae (white cedar) trees added for improved screening.

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.

The height of the proposed monopole is the minimum required to satisfy T-Mobile's coverage objectives. The proposed height will allow four (4) telecommunication carriers to co-locate upon it with sufficient elevations to provide effective coverage in a residential 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.

Applicants are working closely with Holmes Middle School and the Fairfax County Board of Education to locate the proposed monopole to ensure that there will be no impact on the existing and future public use of the subject property. Holmes Middle School officials have approved the location of the proposed monopole.

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.

Schematic drawings have been submitted with this application that demonstrates the appropriateness of the site for the proposed facility. The proposed facility will not impact the character of the school or the surrounding residential properties. The attached photo simulations also demonstrate the efficacy of the proposed site. Proposed monopole is designed as a "low-profile" structure whereas the antennas are flush mounted to the monopole making their appearance not as visible as a full array monopole structure.

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.

The photo simulations enclosed with this application demonstrate the appropriateness of utilizing this site, by showing the visual impact from various locations around the subject property. The photo simulations also show the antennas flush mounted to the structure to mitigate the visual impact.

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.

The school building itself will help to screen the view of the bottom portion. The proposed 115' monopole will allow for future utilization by up to four (4) additional telecommunication carriers, thereby reducing the need for other similar structures. The photo simulations also show the antennas flush mounted to the structure to mitigate the visual impact.

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.

The proposed use would not alter historically significant landscapes or views from the architecturally or historically significant structures.

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

The proposed use would not impact any environmentally sensitive areas.

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

As noted previously and shown on attached Entrex drawings, the proposal will allow for future expansion of up to four (4) additional carriers and all equipment will be situated in a enclosed wooden compound screened with 6' high red cedar and Eastern Arborvitae (white cedar) trees.

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.

The proposed location is almost 340 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.

N/A

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;

The proposed monopole with its steel construction is close in proximity to existing vertical light poles found on school property.

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;

Applicant's monopole is at the lowest height required to provide coverage to the target area. The height of the monopole is not unusual for a monopole. The equipment compound will be of normal size for a communications facility. In addition, by utilizing the monopole design, the visual impact to the area will be minimal. It accomplishes this by providing both adequate wireless telecommunication services and the potential 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.

Monopole will be located behind 8' high board-on-board fence with 6' high red cedar and Eastern Arborvitae (white cedar) trees added for improved screening.

For the reasons stated above, T-Mobile Northeast LLC and Milestone Communications respectfully request that the 2232 Application be accepted.