

We, the Short Hill Rescue community group, thank the Loudoun County Board of Supervisors, the Planning Commission, the Communications Commission, and staff in the Department of Planning and Zoning, for the opportunity to communicate our initial concerns with the application PRAP-2018-0041 from American Telephone & Telegraph of Virginia, seeking a Special Exception from existing zoning ordinances, in order to erect a 155' telecommunications monopole on land zoned AR-1, on the ridge line of Short Hill Mountain.

Zoning Ordinance Protects Ridge Lines In Loudoun County

Loudoun County's revised 1993 Zoning Ordinance, Section 5-618 states that ***“Telecommunications monopoles shall not be located along ridge lines, but downslope from the top of ridge lines, to protect views of the Catoctin, Bull Run, Hogback, Short Hill, and Blue Ridge Mountains.”*** This application from AT&T would place the proposed monopole directly on the ridge line, on property located at 12355 White Rock Road, Purcellville, VA 20132, tax identification number 477387669000.

This above-quoted ordinance protecting the ridge lines is a criteria that even Special Exceptions are subject to, per 5-516 B (3).

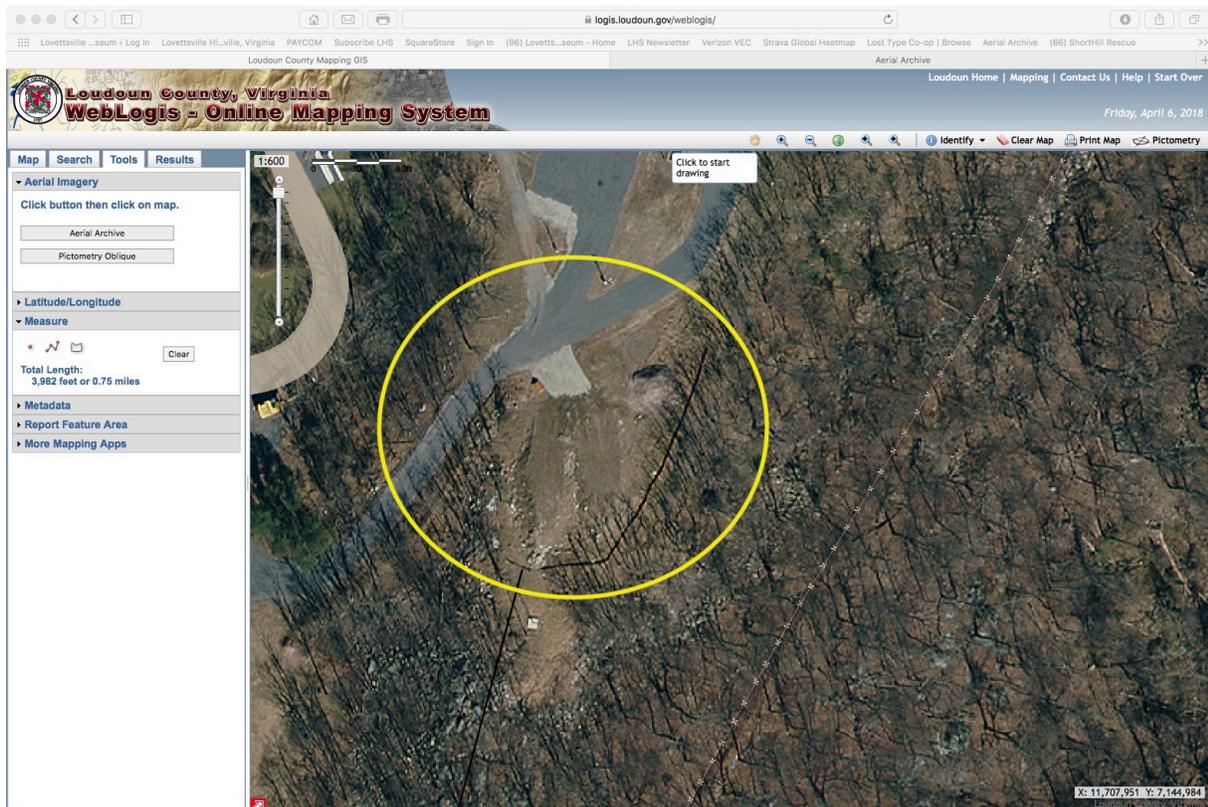


Image: Location of the proposed monopole on the protected Short Hill Mountain ridge line, showing graded area and silt fence, from Weblogis.

Define the Purpose of the Monopole

AT&T's proposed monopole on Short Hill Mountain at 12355 White Rock Road, Purcellville, VA 20132, is indicated on the plats as a 150 foot structure capped with a 5 foot antenna. The proposed location for the monopole, at approximately 1,424 feet altitude, already has clear line of sight and unobstructed terrain from that spot to Hagerstown, Maryland, to Waldorf, Maryland, and to all the way to Washington DC, which were the original reasons AT&T acquired the land in 1962-1963.

To provide commercial cellular communications in western Loudoun, AT&T would need only a pole that clears the top of the tree line on the subject site, which typically calls for at the most, an 80 foot pole. Therefore this proposed monopole is at least 70 feet too high for any public cellular use AT&T is claiming.

Short Hill Rescue seeks an answer from AT&T to the question, "What services, using what technology, does American Telephone & Telegraph of Virginia, intend to offer from this telecommunications monopole?"

AT&T states in the application that the purpose of the monopole is to provide and improve wireless services to the citizens of Loudoun County and that the height of the monopole was chosen to improve current coverage gaps. AT&T's current cellular coverage map shows very few dead areas near Short Hill. We at Short Hill Rescue urge pre-application meeting attendees to ask the Applicant about current cellular coverage gaps and how they will be resolved by this new monopole.

AT&T states in the PRAP-2018-0041 document, that the monopole will be open to two more carriers. The project description states that the tower will be designed and built to allow room for the equipment of two additional carriers, but does not confirm that this will actually occur. Please define the type of additional carriers for the monopole, and whom their "wireless" will serve.

The Zoning Code also states that ***"Applicants shall submit documentation, in written and graphic form, regarding the service area to be provided by the proposed telecommunications monopole."***

In addition to Applicant documentation, Short Hill Rescue urges our elected and appointed officials to request that the Loudoun Communications Commission perform an analysis of this monopole project and whom it will serve, similar to the 2016 analysis and report titled "Communications Commission Findings" regarding CMPT-2016-0001. See <https://www.loudoun.gov/DocumentCenter/View/121225>

Visual Impact

As proposed on the ridgeline, the monopole will be apparent both day and night. The base of the tower is located at the furthest eastern edge of the property possible (other than positioning it on the eastern slope).

As per Zoning Ordinance Section 5-618, ***"Unless otherwise required by the Federal Communications Commission or the Federal Aviation Administration, monopoles shall blend with the background." And, "No signals or lights or illumination shall be permitted on a monopole, unless required by the Federal Communications Commission, the Federal Aviation Administration, State or Federal authorities, or the County."***

Although the property is characterized by AT&T as "remote," it is actually located within .57 miles of Mountain Road on the east side. Lovettsville and environs has grown and spread to the point that the affected view shed area is now within the suburban fringe of Loudoun County. There are also houses located just a few hundred yards downhill from the eastern property lines.

In addition to the visual impact of the monopole, the visual impact of the accompanying 2,500 square foot "facility" (also referred to in the application as a compound) at the base of the monopole must be considered. The application states that this is a 50x50 foot area, with a 6 foot chain link fence, and a 10 foot tall "WIC," but does not adequately explain if this area is a Structure.

Subject property 477387669000 is located (using the measuring tools in Weblogis) just 3,027 feet or 0.57 miles from Route 690, Mountain Road, which is an official State Scenic Byway. As per Section 5-618 of the Zoning Ordinance, ***"Applicants proposing a new telecommunications monopole within one (1) mile of a County designated historic district or a Virginia Byway shall submit a minimum of three (3) visual simulations and written justification as to why the monopole could not be sited elsewhere."***



Simulation of the visual impact of the proposed AT&T monopole, courtesy of Short Hill Rescue.

And, “The applicant shall provide photoimagery or other visual simulation of the proposed telecommunications monopole shown with the existing conditions of the site. This simulation shall be provided from a minimum of three (3) perspectives.” And, “The applicant shall address how the facility can be designed to mitigate the visual impact on area residents, facilities, and roads.”

Election District

The AT&T monopole plats in PRAP-2018-0041 are incorrectly labeled “Morrisonville,” which is a tiny community, down on the flats near Route 287, south of Lovettsville. Morrisonville is not the location of the proposed monopole.

The forms submitted by representatives of AT&T (PRAP-2018-0041) for the pre-application conference between AT&T and the County for a 155’ monopole on

Short Hill Mountain contain an error regarding election district(s) location. The form indicates the Catoctin District. However, the AT&T property, 12355 White Rock Road, Purcellville, VA 20132, straddles two election districts, the Catoctin District and the Blue Ridge District.

Within the PRAP-2018-0041 document, on the plats for the proposed tower, the address is given as **12332** White Rock Road. This appears to be an error. The address of the AT&T property, (tax ID 477387669000), as per the Loudoun County Tax database and Weblogis database, is 12355 White Rock Road, Purcellville, VA 20132.

Short Hill Rescue is concerned whether all affected (in both districts) supervisors, planning commissioners and communications commission members, in both the Catoctin District and the Blue Ridge District, were properly notified of the monopole application, and of the date and time of the pre-application meeting.

It is also important to correct the election district information, so that the community information meetings and public hearings will be held in affected communities in both districts. According to Section 5-618, ***“In addition to those entitled to notice under the provisions of Section 6-600 of this Ordinance, all owner(s), or their agent(s), of all properties abutting or immediately and diagonally across the street or road from those properties whose owners are entitled to notice under Section 6-600, shall be provided with the same written notice. The applicant is also encouraged to meet with community and homeowners association groups in the area.”***

AT&T hired a public relations consultant, David D’Onofrio of The Casey Group, to reach out to Sam Kroiz of Short Hill Rescue. However, we are not aware of any other community outreach having been performed, despite the far-reaching implications of the proposed facility.

Pre-Application Meeting

Can the public attend the pre-application meeting(s)? Will the meeting minutes be posted on www.loudoun.gov/lola in the project area dedicated to PRAP-2018-0041?

Sincerely,
The Short Hill Rescue Community Group