



DONOHUE & STEARNS, PLC

September 24, 2021

Margaret Maliszewski, Planning Manager
Albemarle County Community Development, Planning Division
401 McIntire Road
Charlottesville, VA 22902

Cc: Members of the Albemarle County Architectural Review Board

Re: Opposition to Parallel Infrastructure's ARB Application No.202100106

Ms. Maliszewski:

We represent SBA Towers V, LLC("SBA"), the owner of the existing telecommunications facility located at 3019 Monacan Trail Road, North Garden, Virginia 22959 ("existing SBA site") that was unanimously approved by the Albemarle County Planning Commission on January 6, 2009. On behalf of SBA, we oppose the Architectural Review Board application (the "application") filed by Parallel Infrastructure ("Parallel" or the "Applicant") for an 87' monopole (the "proposed monopole") at 2415 Southside Drive, North Garden, Virginia 22959 - and scheduled for consideration by the Board on October 4, 2021. As discussed in detail below, the proposed monopole is not needed and unnecessarily impairs the surrounding viewsheds in direct violation of the objectives of the ARB.

I. The Proposed Monopole Adds a Redundant and Unnecessary Structure to the Viewsheds Along the Entrance Corridor

In direct violation of the stated purposes and objectives of the ARB and the Design Guidelines, the proposed monopole adds a redundant and unnecessary tall and visually impactful structure to Route 29. The articulated goals of the Design Guidelines include the promotion of an organized development plan. Allowing the proposed monopole to be installed only .15 miles (see attached distance slide) from the existing SBA site where there is no need at all (as described below) only negatively impacts those living, working and traveling through this part of Albemarle County.

II. The Proposed Monopole Is Not Needed - AT&T Has Sufficient Coverage

The existing SBA site is a 76' monopole where AT&T is installed at the highest centerline of 74'. It serves this exact area as demonstrated by the attached propagation maps that show the existing SBA site's current coverage and the proposed monopole's predicted coverage – they are the same. Again, the Applicant proposes to install the proposed monopole a mere .15 miles from the existing monopole. The proposed monopole is not needed for coverage, capacity or interference reasons. Area AT&T subscribers and emergency response personnel have not

experienced any degradation in coverage manifested in dropped or blocked calls that would justify a new monopole here.

III. The SBA Monopole Can Accommodate AT&T

The SBA site was originally built for AT&T (SDP200800169) and they drove the height needed for effective coverage. The ARB approved the application due to the lack of visibility from Route 29. When the application came before the Planning Commission, colocation questions arose. There was and still is another monopole within 200' of the SBA site that houses NTelos. In response to the Planning Commission's inquiries, the agent for AT&T explained that the site was considered by AT&T, but the surrounding tree cover prevented effective signal propagation from the centerline available to AT&T to Route 29– the targeted area of improvement. So, like the ARB, the Planning Commission approved the application unanimously.

As demonstrated by the careful and complete consideration by the ARB and Planning Commission of the existing SBA site, negative visual impacts should be avoided through the encouragement of colocation when possible. Here, it is not only possible at a less visible location – it is currently in place and providing the exact coverage that the proposed site promises.

Additionally, the sudden need for increased height is surprising as it was never broached with SBA. This is likely due to the fact that no additional height is actually required. Given that the existing SBA site is at 739 feet above mean sea level and the location for the proposed monopole is at 723 feet above mean sea level, the existing SBA site where AT&T is currently installed is already a net six (6) feet higher at its current location – the existing SBA site. AT&T is installed at a taller height on the existing SBA facility so the County can avoid the construction of this proposed additional monopole and the significant negative visual impact of three monopoles sited in such close proximity (803 feet).

A. The Proposed Monopole Will Be More Visually Impactful Given the Non-Flush-Mounted Antennas

The Applicant is also seeking special exception relief from Albemarle Zoning Ordinance section 5.1.40(b)(2)(c) that requires the flush-mounted antennas. This requirement is especially relevant to the ARB's review as it significantly slim the profile of any proposed monopole. The existing SBA site abided by this requirement, is taller and currently provides the exact coverage proposed by the Applicant's redundant and noncompliant structure.

IV. The Virginia Code Underscores the Importance of Prioritizing Co-location

Virginia Code §15.2-2316.4:2(D) specifically preserves the right of local jurisdictions to deny applications “on the basis of the availability of existing wireless support structures within a reasonable distance that could be used for co-location at reasonable terms and conditions without imposing technical limitations on the applicant. Section 15.2-2316.4:3(B) similarly maintains the

right of localities to “limit[ing] the number of new structures or the number of wireless facilities that can be installed in a specific location.”

Here, there is an existing telecommunications facility where co-location is not only possible, but actually in place and fully functional (with the structural capacity for equipment upgrades and increased height). AT&T will suffer no technical limitations as a result of remaining on the existing SBA site. The Board should exercise its right to limit the number of new structures in this specific location and the impact on surrounding properties – *especially* where it is completely unnecessary.

Conclusion

There is no need for the proposed monopole. The addition of a superfluous monopole so close to an existing and fully functional facility with AT&T at a greater height would create unnecessary visual impacts for the surrounding property owners and Albemarle residents. The existing SBA site provides the needed coverage and capacity and, as noted above, is structurally capable of additional upgrades to accommodate future equipment. The Applicant has provided no data to support the claims of insufficient service, capacity or structural. The only way to avoid three (3) monopoles so close together is for the Board to deny the Applicant’s request.

An approval here would open the door for similar redundant applications and multiple monopoles within a matter of feet of one another.

We appreciate staff’s consideration of this letter and request that the application be denied as the proposed monopole would be redundant and would result in unnecessary negative visual impacts.

Thank you,



Edward L. Donohue

Enclosures (2)

Distance Between the Existing 80' SBA Tower and the Proposed 89' Parallel Infrastructure Tower

NOTE : AT&T is an existing collocator on the existing SBA tower with antennas mounted at a height of 75 feet



Distance = 803 feet/ 0.152miles

TO: SBA

Subject: RF Coverage Plot Analysis: Albemarle County, VA

Date: September 17, 2021

1. **METHODOLOGY.** The attached plots depict broadcast radio frequency (RF) coverage from the existing site to Albemarle County, VA and a proposed site approximately 0.1521 miles to the northeast. At each location, cellular industry typical LTE operating parameters were considered for omnidirectional antennas mounted at 75 feet above ground level at the existing site, and at 84 feet above ground level for the proposed site. Ground elevations are 739 and 723 feet above mean sea level, respectively. 5G Broadcast RF coverage was not reviewed since it is not operational as of this date.

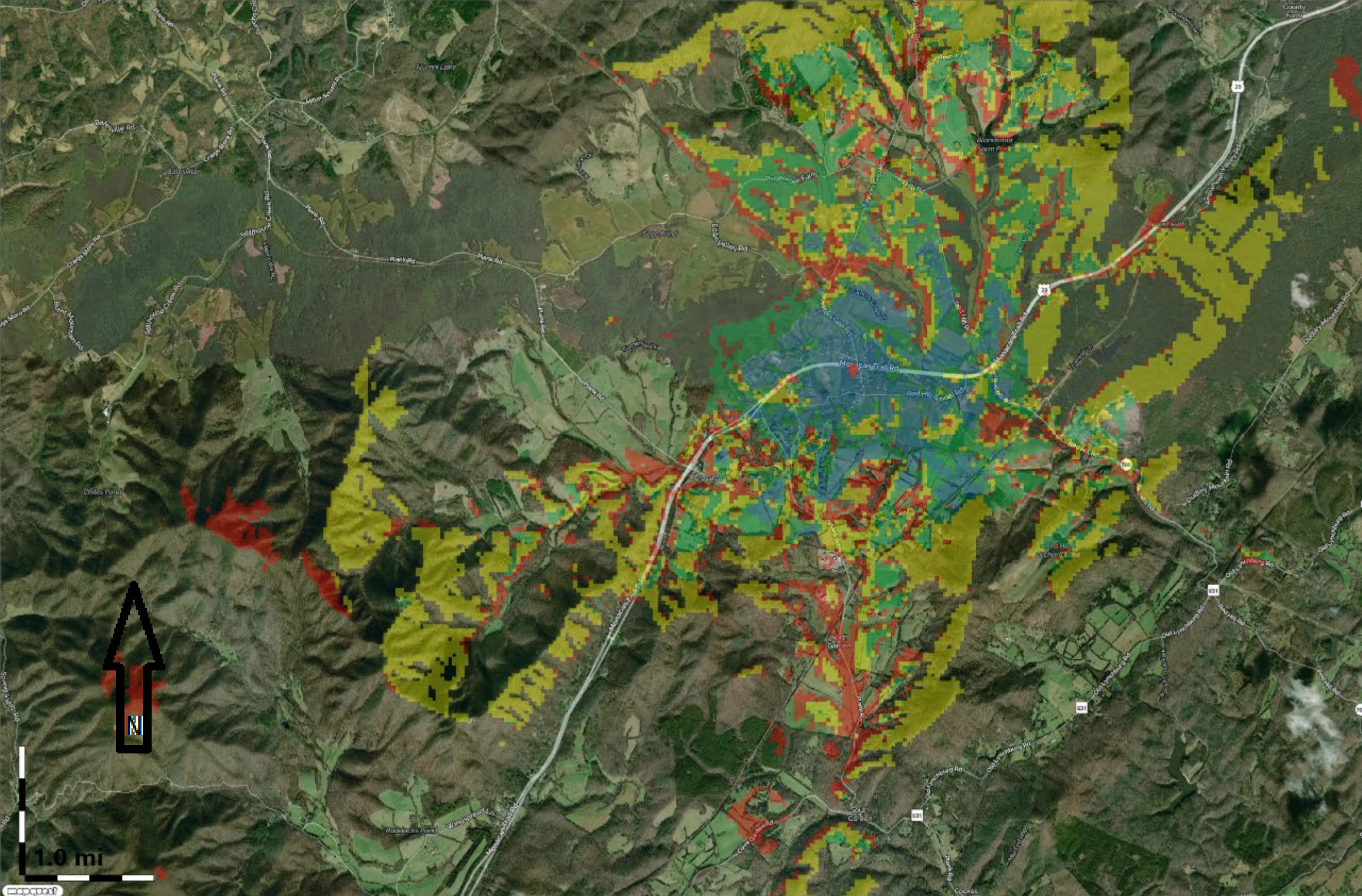
Plots for both locations were generated for 700, 850, 1900 and 2100 MHz operations. The signal levels depicted are associated with LTE service reliability where the strong coverage levels in green and blue occur near the towers and decrease with distance from the sites and intervening terrain obstructions. Signal levels greater than -70 dBm shown as blue are associated with feasible coverage within buildings. Marginal coverage is provided in the regions depicted in yellow between -90 dBm and -80 dBm and signal levels between -100 dBm and -90 dBm shown as red represent poor coverage associated with call failures.

A comparison of coverage performance for each site is based on low band (700 and 850 MHz) and high band (1900 and 2100 MHz) prediction results. Radiowave propagation conditions between these bands differ because of terrain and ground clutter (e.g. vegetation) effects at different frequencies. Generally, low band operations provide greater area coverage. Therefore, high band operations provide additional customer traffic capacity closer to the cellular site.

2. **COMPARISON.** The sites considered in these coverage plots provide service to the depicted locations and roads leading to Albemarle County, VA. For low band operations, the existing site provides strong coverage approximately 0.75 miles in all directions and to non-contiguous areas to 1 mile from the site. This includes 0.75 miles of US 29. The proposed site provides similar strong coverage 0.75 miles in all directions and to non-contiguous areas to 1 mile. This includes 0.75 miles of US 29. Both sites provide marginal coverage to non-contiguous areas up 1.25 miles from the site.

For high band operations, both sites provide strong coverage to non-contiguous areas 0.75 miles in all directions.

3. **CONCLUSION.** Based on the coverage comparison presented above, the proposed site provides comparable coverage to Albemarle County, VA due to its close proximity to the existing site. For wireless operators with antennas mounted on the existing site, the installation of additional antennas on the proposed site would be considered to be an “overbuild” or impractical given the coverage overlap.

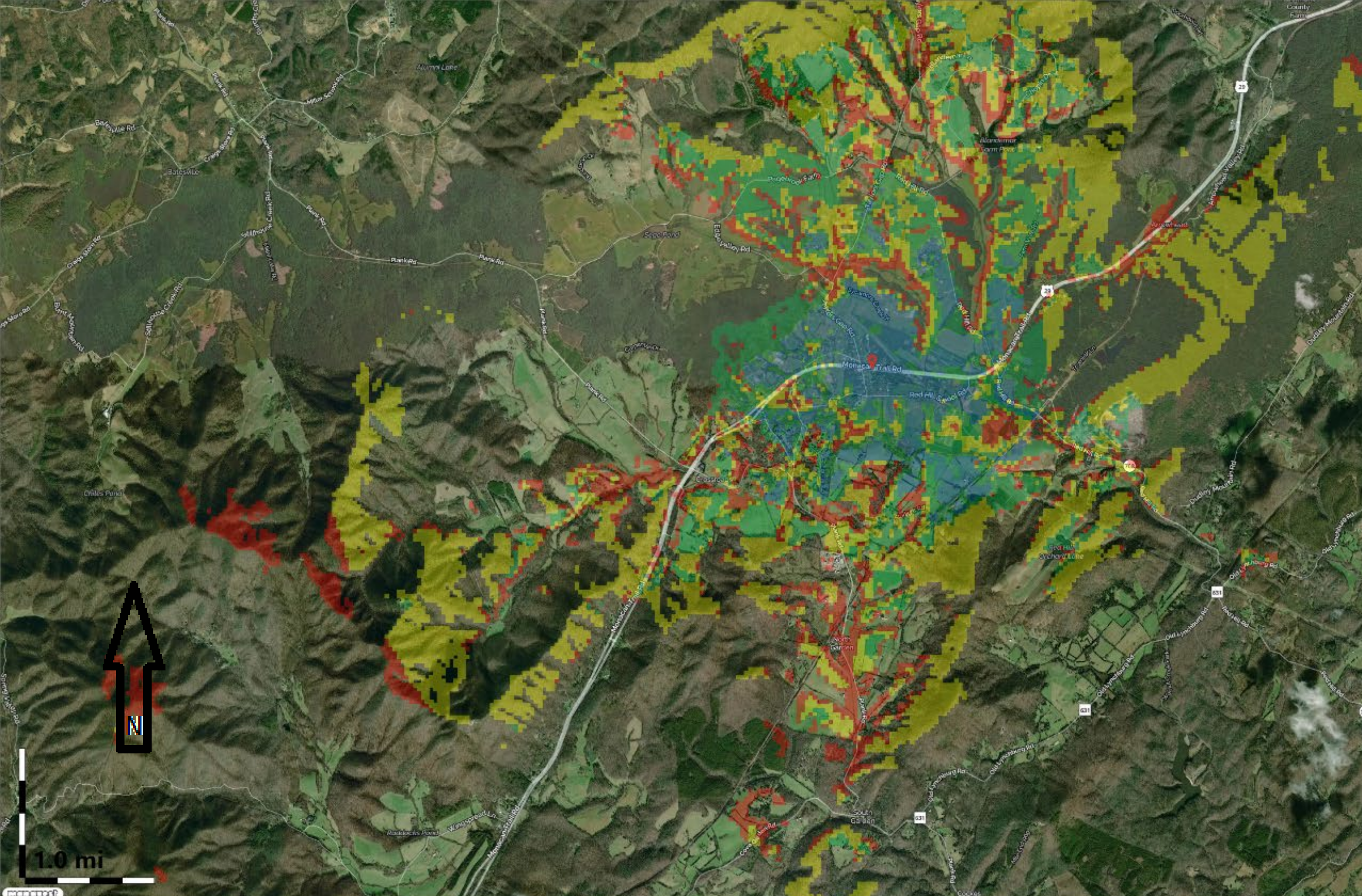


Existing Site
700 MHz Coverage

Site Name: VA14344-A
Latitude: N37.967458
Longitude: W78.635953

Antenna: 15.15 dBi Omni
Alpha Rad Center (ft): 75
Azimuth (Deg): 0
ERP per RS (W): 2.0



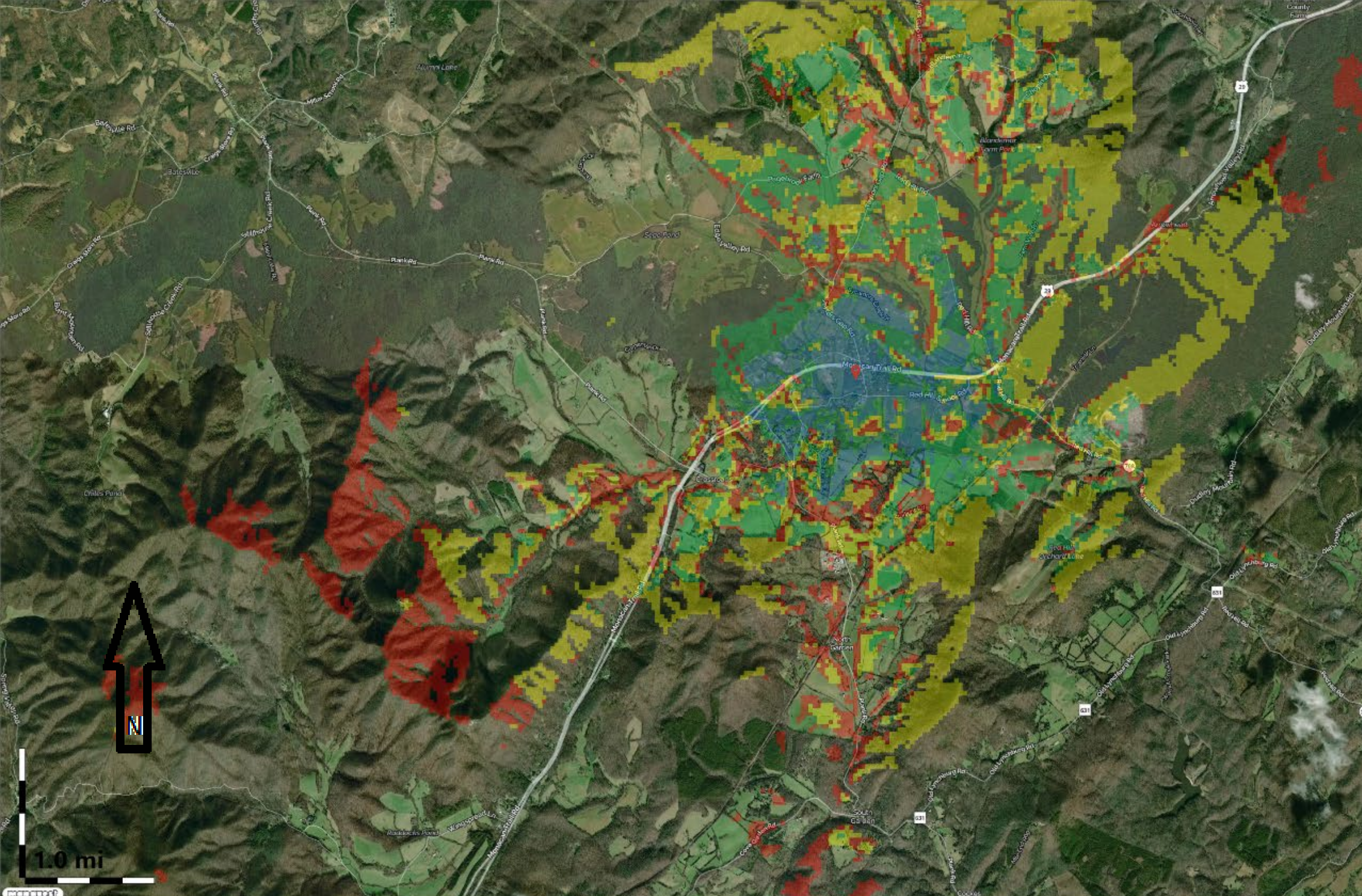


Proposed Site 700 MHz Coverage

Site Name: Proposed
Latitude: N37.968606
Longitude: W78.633586

Antenna: 15.15 dBi Omni
Alpha Rad Center (ft): 84
Azimuth (Deg): 0
ERP per RS (W): 2.0

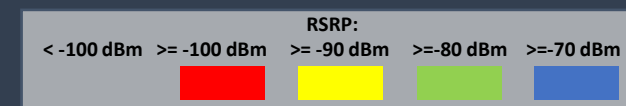


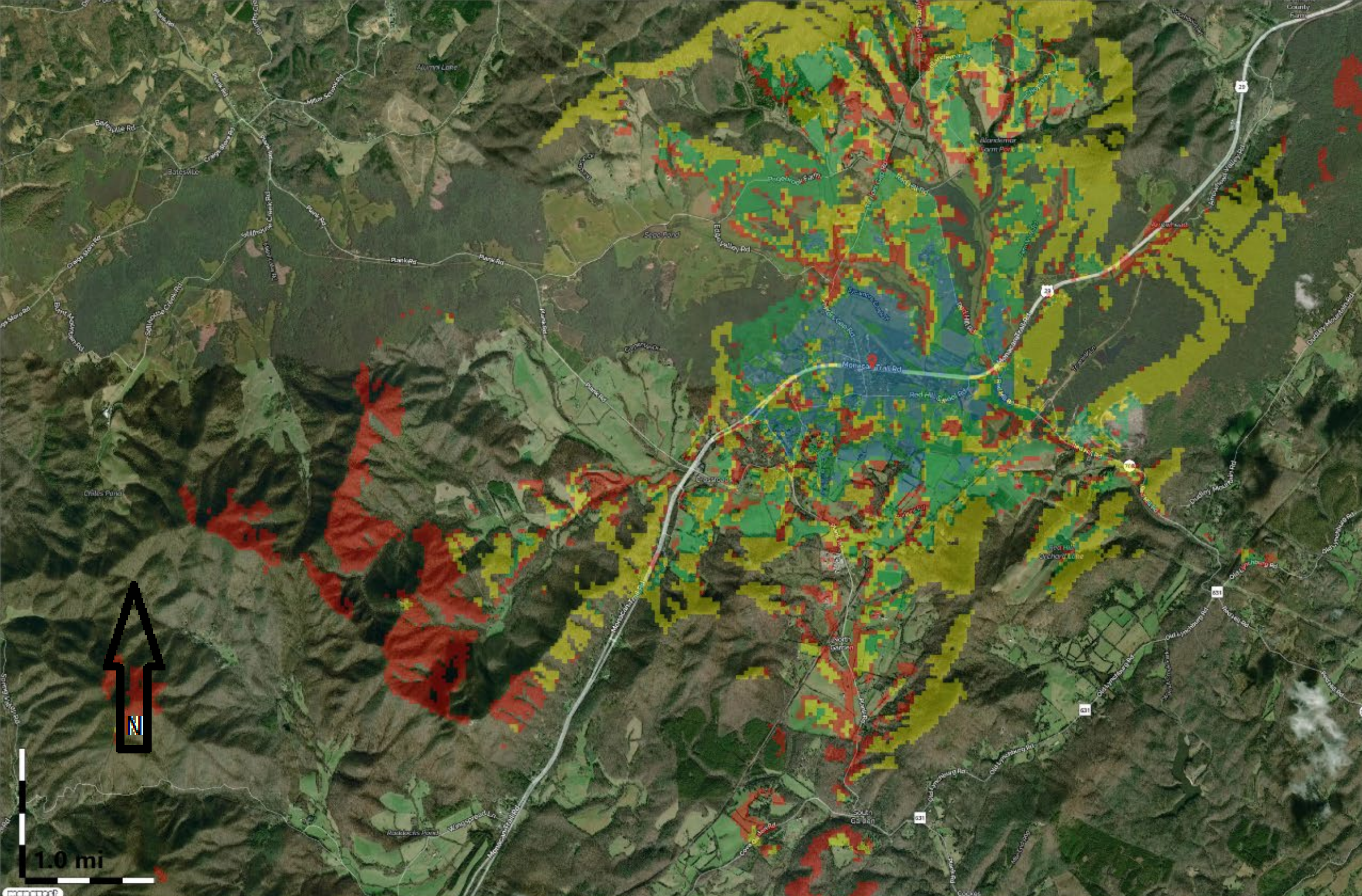


Existing Site
850 MHz Coverage

Site Name: VA14344-A
Latitude: N37.967458
Longitude: W78.635953

Antenna: 15.15 dBi Omni
Alpha Rad Center (ft): 75
Azimuth (Deg): 0
ERP per RS (W): 2.0



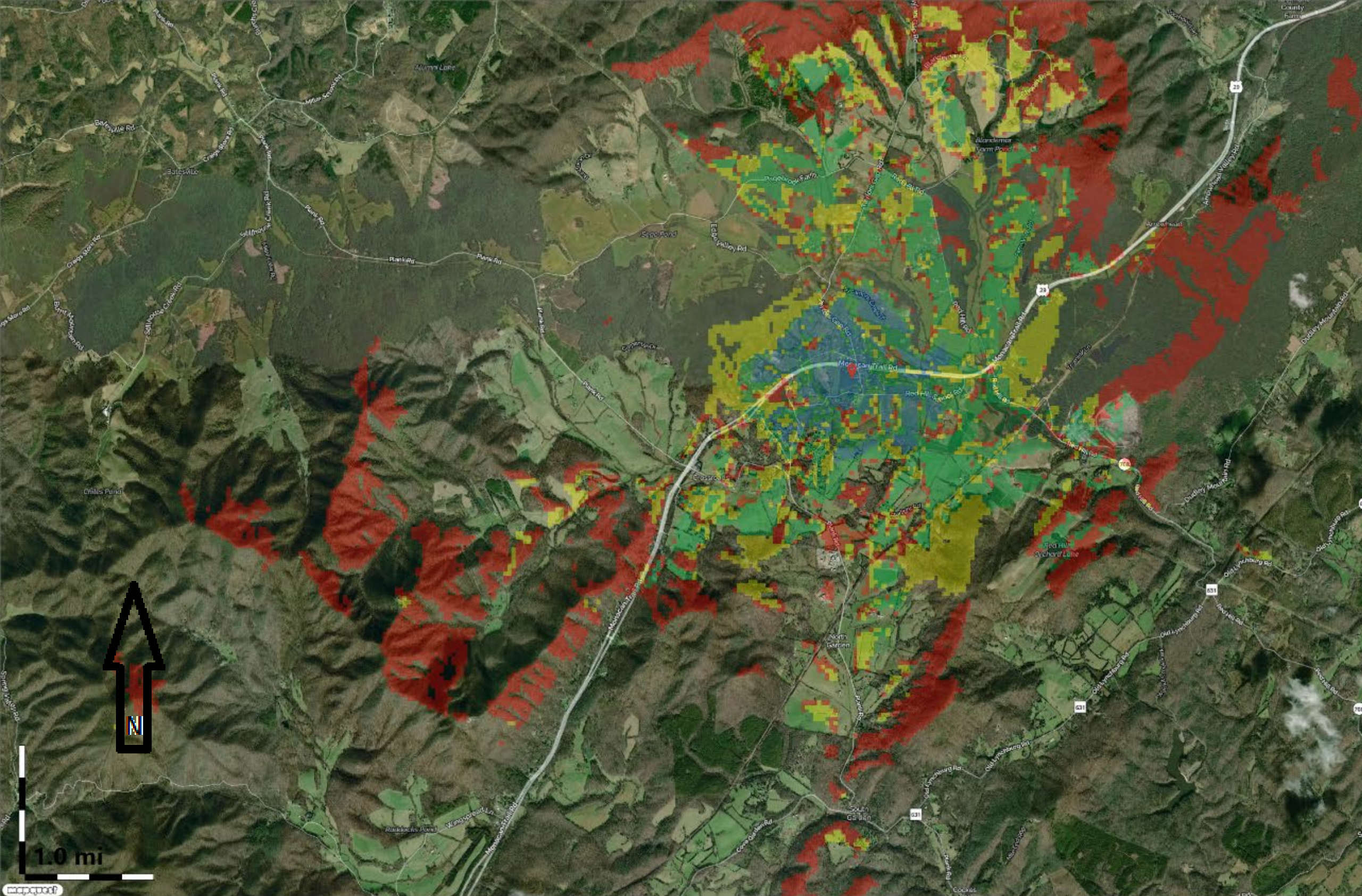


Proposed Site 850 MHz Coverage

Site Name: Proposed
Latitude: N37.968606
Longitude: W78.633586

Antenna: 15.15 dBi Omni
Alpha Rad Center (ft): 84
Azimuth (Deg): 0
ERP per RS (W): 2.0

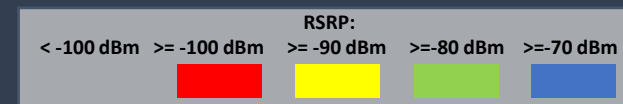


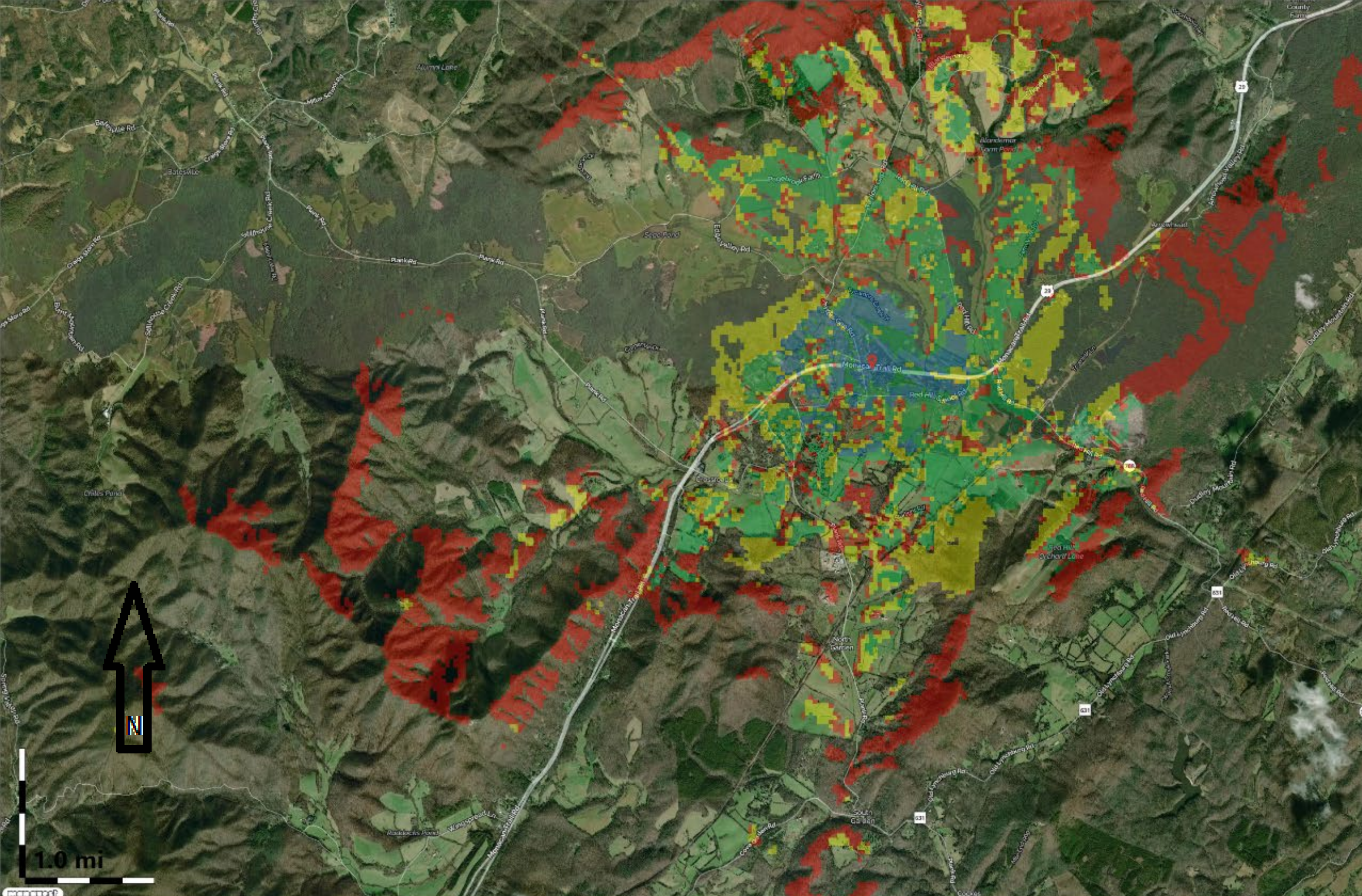


Existing Site
1900 MHz Coverage

Site Name: VA14344-A
Latitude: N37.967458
Longitude: W78.635953

Antenna: 17.15 dBi Omni
Alpha Rad Center (ft): 75
Azimuth (Deg): 0
ERP per RS (W): 4.7

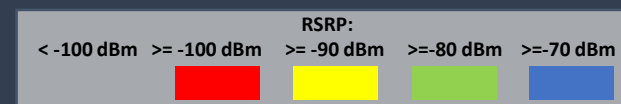


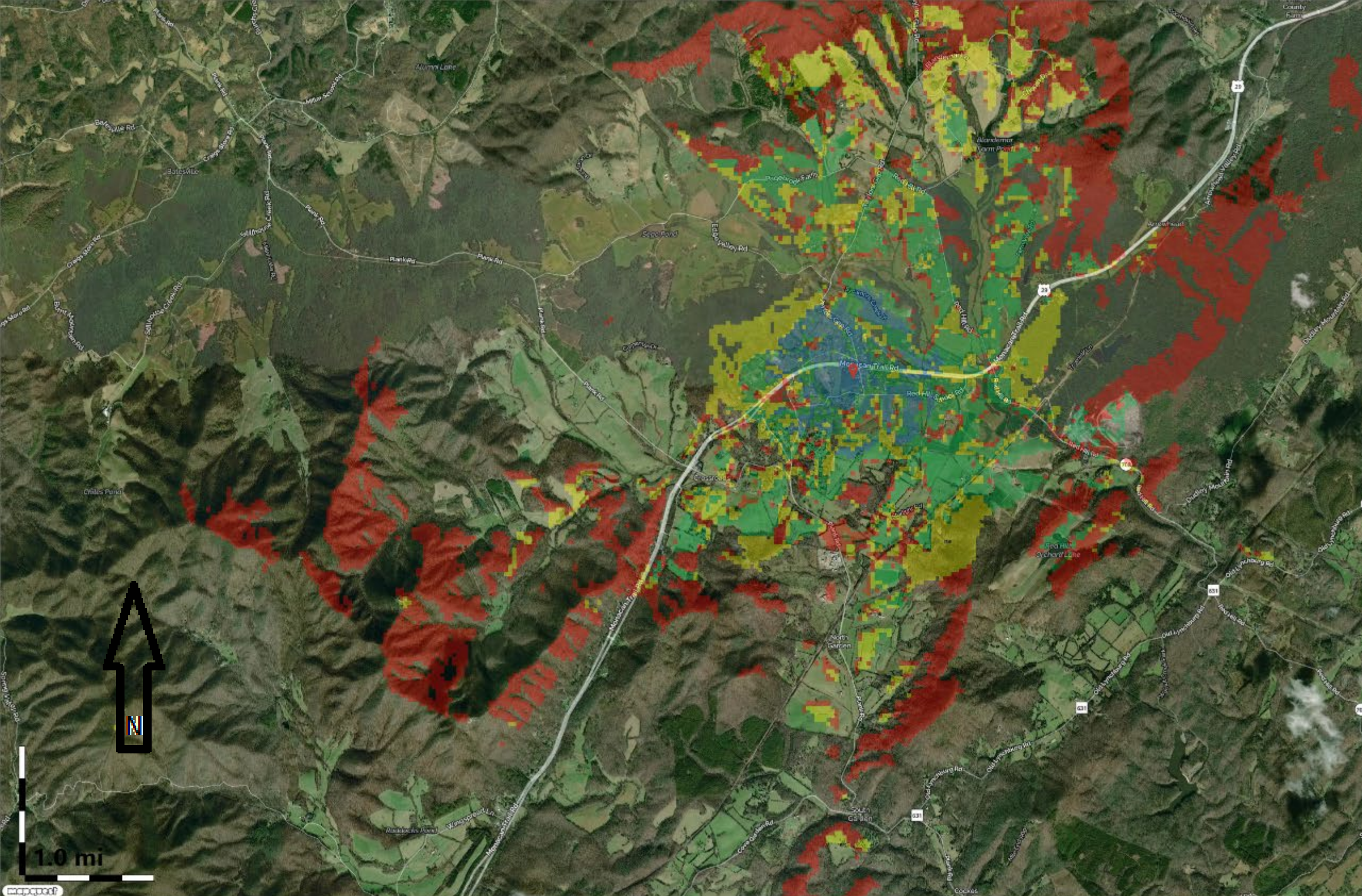


Proposed Site 1900 MHz Coverage

Site Name: Proposed
Latitude: N37.968606
Longitude: W78.633586

Antenna: 17.15 dBi Omni
Alpha Rad Center (ft): 84
Azimuth (Deg): 0
ERP per RS (W): 4.7

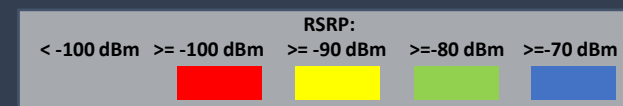


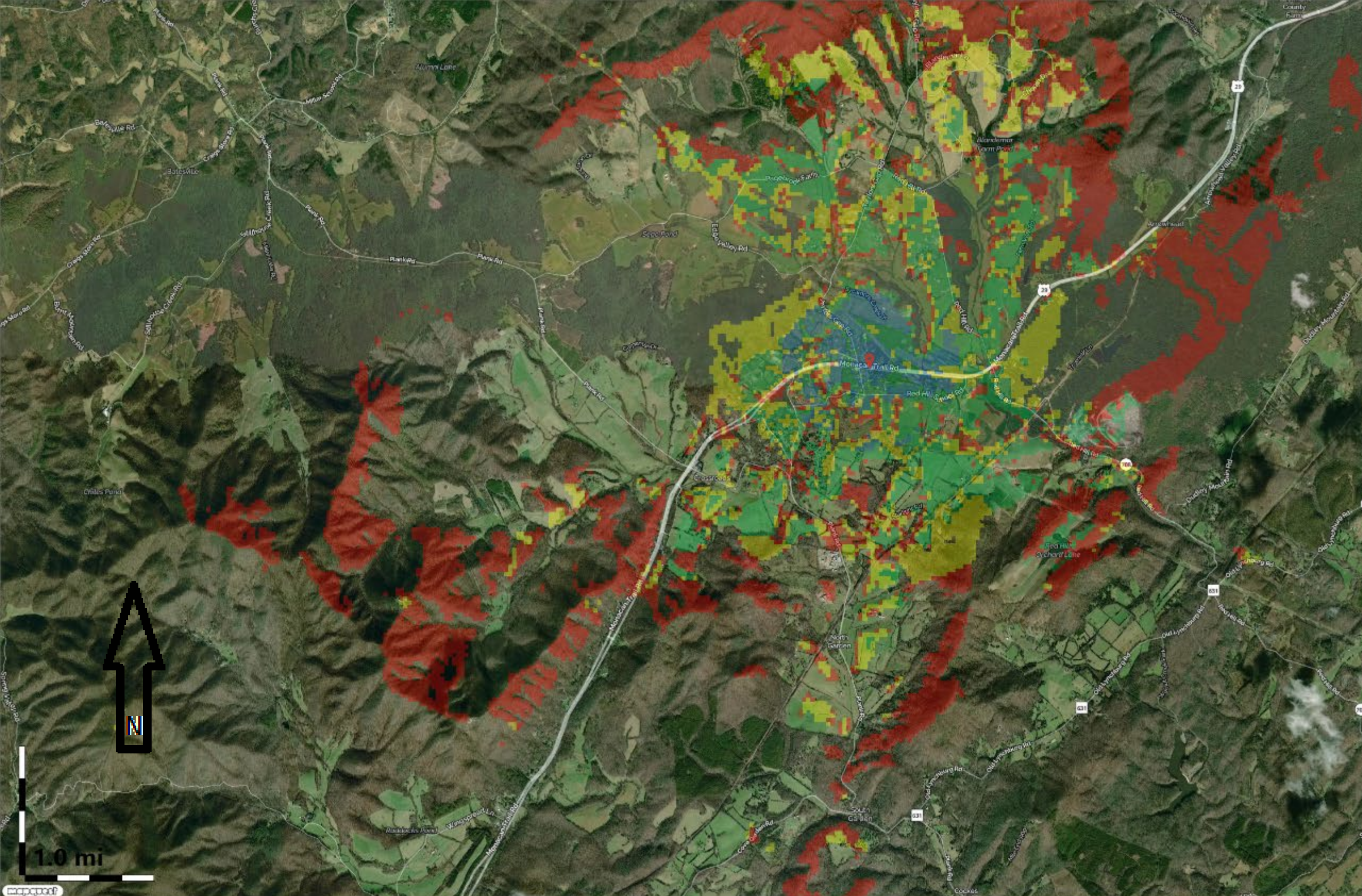


Existing Site
2100 MHz Coverage

Site Name: VA14344-A
Latitude: N37.967458
Longitude: W78.635953

Antenna: 17.15 dBi Omni
Alpha Rad Center (ft): 75
Azimuth (Deg): 0
ERP per RS (W): 4.7





Proposed Site 2100 MHz Coverage

Site Name: Proposed
Latitude: N37.968606
Longitude: W78.633586

Antenna: 17.15 dBi Omni
Alpha Rad Center (ft): 84
Azimuth (Deg): 0
ERP per RS (W): 4.7

