

**BOARD OF SUPERVISORS
BUSINESS MEETING
ACTION ITEM**

SUBJECT: CMPT-2016-0001, AT&T Short Hill

ELECTION DISTRICT: Blue Ridge/Catoctin

CRITICAL ACTION DATE: June 25, 2016 (within 60 days after Planning Commission action)

STAFF CONTACTS: Steve Barney, Project Manager, Planning & Zoning
Ricky Barker, AICP, Director, Planning & Zoning

PURPOSE: The purpose of this application is to consider a Commission Permit for a Utility Substation, Transmission in the AR-1 (Agricultural-Rural 1) zoning district.

RECOMMENDATIONS:

Planning Commission: The Planning Commission (Commission) approved (6-2-1, Lloyd, Scheel opposed; Klancher absent) the application and forwarded it to the Board of Supervisors (Board) for ratification based on the Findings for Approval (Attachment 1).

Staff: Staff recommends that the Board ratify the Commission's approval of the Commission Permit subject to the Commission Permit Plat dated January 22, 2016, and revised through March 29, 2016. Staff finds that the location, character, and extent of the proposed telephone transmission utility substation are in substantial accord with the Comprehensive Plan. There are no Conditions of Approval for Commission Permits. The item is ready for action.

BACKGROUND: AT&T seeks Commission Permit approval to expand an existing telephone transmission utility substation within the Rural Policy Area. The subject parcel is located on the ridgeline of Short Hill Mountain, east of Neersville, on the east side of Harpers Ferry Road approximately 2.5 miles north of the intersection with Charles Town Pike (Route 9) and approximately 4,000 feet south of the intersection with Sagle Road (Route 287). The proposed expansion would entail the construction of a 160,000 square foot building primarily containing mechanical and electrical equipment. The subject site is an approximately 15.3 acre portion of an approximately 176.38 acre parcel (138.61 acres assessed) which is located in both the Blue Ridge and Catoctin Election Districts as shown in Attachment 2. All proposed work will be within the Catoctin District; the property's existing driveway entrance onto Harpers Ferry Road

is the only part of the property located in the Blue Ridge District. Site access is proposed via White Rock Road, an existing private road within the subject property with a 16' paved width.

The height of the facility will vary from approximately 18 feet for the one-story portion of the building to 35 feet for the two-story portion of the building. The purpose of the request is to install modern data transmission and processing equipment to support the continued operations of the existing manned communications facility that has been in operation on the property since the early 1960s.

Zoning Administration staff discussed the proposed land use with the applicant and concluded that the proposed use is a Utility Substation, Transmission. The Ordinance defines Utility Substation, Transmission as "A facility primarily serving as part of a regional interconnecting grid system which provides for the transformation, switching and distribution of both transmission voltage and/or distribution voltages, transmits natural gas, television or telephone signals. Such use may include a distribution and/or dedicated substation".

In accordance with the Revised 1993 Zoning Ordinance, a Commission Permit is required prior to constructing a public use, such as a substation, to determine if the general location, character, and extent of the use are in substantial accordance with the Comprehensive Plan. A transmission utility substation is a permitted use within the AR-1 (Agricultural – Rural 1) zoning district. However in this case, because the proposed 160,000 square foot facility was not included in the original 1962 Commission Permit application for the existing facility, a new Commission Permit is required for the expansion of the existing use.

The property is located within the Rural Policy Area and is designated for rural economy uses and limited residential development at a density of one dwelling unit per 20 acres. The policies of the Revised General Plan (Plan) support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area if the use is determined to be compatible in scale and intensity with the surrounding area, poses no serious threat to public health or safety and meets applicable performance standards. Staff finds that the proposed development is compatible in that it provides for additional landscaping and reforestation and a building color pattern intended to blend in with its surroundings.

Plan policies allow for development in mountainside areas subject to performance standards such as minimizing land disturbance and negative environmental impacts; the proposed development meets these standards by being located on a pre-disturbed area and minimizing additional disturbance. Additionally, the proposed transmission utility substation supports the objectives of the Strategic Land Use Plan for Telecommunication Facilities by providing modern, effective and efficient telecommunications infrastructure while mitigating impacts on the County's residents, nearby land uses, and viewsheds.

The substation is consistent with the Energy and Communication Facilities policies of the Plan, which identify communication service as an essential component of daily life and support the timely delivery of communication service to businesses and households as development occurs while seeking to minimize negative visual impacts.

For additional information regarding the application, refer to the Planning Commission public hearing staff report (Attachment 3).

The Commission held a public hearing regarding this application on April 26, 2016. Commissioners' questions and responses from staff and the applicant are included as Attachment 4.

Five members of the public spoke in opposition to the application, and identified concerns with the visual impact of the development on the surrounding viewshed, the accuracy of the land use classification, impact of stormwater runoff on groundwater and streams, sewage treatment, lighting, noise, public notice, and consistency with the Revised General Plan.

In response to public comments, the applicant stated that notes on the plan address building appearance, landscaping, lighting, and noise; and clarified that generators would be only for backup purposes rather than for ongoing use.

At the conclusion of the public hearing, the Commission approved (6-2-1, Lloyd, Scheel opposed; Klancher absent) the Commission Permit and forwarded it to the Board for ratification based on the Findings for Approval in Attachment 1. The Board has 60 days (or June 25, 2016) after the Commission's action to ratify or overrule the Commission's decision.

ISSUES: Staff and the Commission noted no outstanding issues with this Commission Permit application.

FISCAL IMPACT: As a public utility, no fiscal impact to the County is anticipated.

ALTERNATIVES: The Board may ratify the Commission's decision to approve the Commission permit application, overrule the Commission's decision, or forward the application to another meeting for action.

DRAFT MOTIONS:

1. I move that the Board of Supervisors **ratify** the Planning Commission's approval of CMPT-2016-0001, AT&T Short Hill, subject to the Commission Permit Plat dated January 22, 2016, and revised through March 29, 2016, and based on the Findings for Approval provided as Attachment 1 to May 19, 2016 Action Item.

OR

2. I move that the Board of Supervisors **overrule** the Planning Commission's approval of CMPT-2016-0001, AT&T Short Hill

OR

3. I move that the Board of Supervisors **forward** CMPT-2016-0001, AT&T Short Hill to a **Business Meeting** for further discussion.

OR

4. I move an alternate motion.

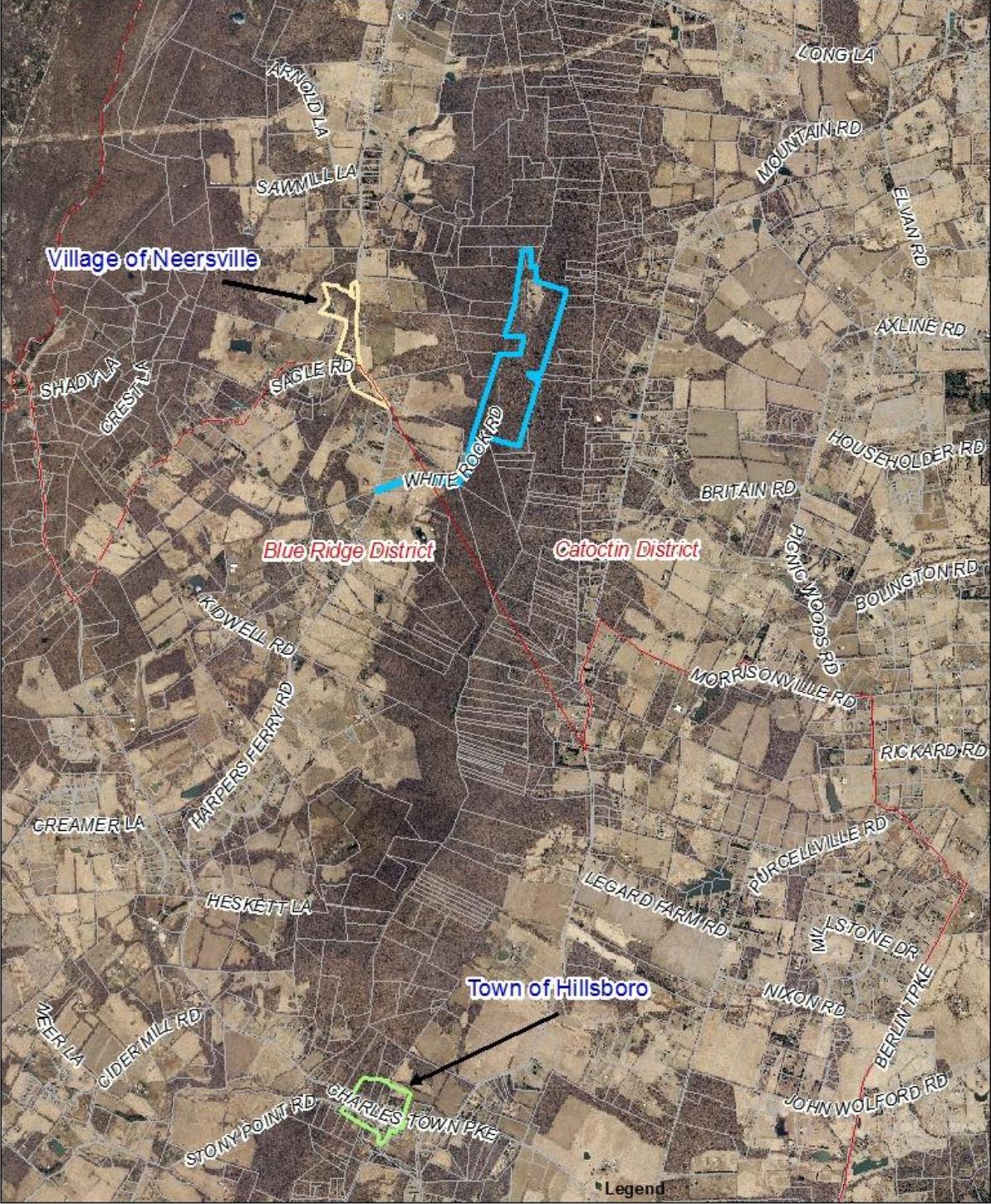
ATTACHMENTS:

1. Findings for Approval
2. Vicinity Map
3. Planning Commission Public Hearing Staff Report
4. April 26, 2016 Public Hearing: Commissioner Questions and Applicant/Staff Responses
5. Commission Permit Plat (January 22, 2016, as revised through March 29, 2016)

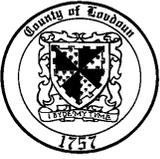
Findings for Approval

1. The general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation are in substantial accord with the Comprehensive Plan, specifically, the Rural Economy and Green Infrastructure policies of the Revised General Plan and will allow the continued use of an existing communications facility in operation for over fifty years.
2. The general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation are in substantial accord with the Countywide Transportation Plan and the Bicycle & Pedestrian Mobility Master Plan, as the proposed development does not conflict with any existing or planned CTP roadways, will add minimal trips to the public roadway network and will not generate the need for transportation improvements.
3. The proposed expansion of the existing telephone transmission utility substation is in general compliance with the AR-1 (Agricultural-Rural 1) regulations of the Revised 1993 Zoning Ordinance. The layout shown on the CMPT Plat demonstrates that the proposed uses can comply with the Additional Regulations for Utility Substations set forth in Section 5-616 of the Ordinance.
4. The proposed expansion of the existing telephone transmission utility substation will provide modern, effective and efficient telecommunications infrastructure and enhance the overall communications network within the County, to the benefit of area residents, businesses, and governments. The proposed expansion would mitigate impacts on the County's residents, nearby land uses, and viewsheds and would support the objectives of the Strategic Land Use Plan for Telecommunication Facilities.

Vicinity Map



March, 2016 - Loudoun County Dept. of Planning & Zoning



PLANNING COMMISSION PUBLIC HEARING

SUBJECT: CMPT-2016-0001, AT&T Short Hill

ELECTION DISTRICT: Catoctin / Blue Ridge (all proposed work within Blue Ridge)

CRITICAL ACTION DATE: Extended to February 9, 2017

STAFF CONTACTS: Steve Barney, Project Manager, Dept. of Planning & Zoning
Ricky Barker, AICP, Director, Dept. of Planning & Zoning

APPLICANT: Wayne Barker, Principal Project Manager, Parsons
Environment & Infrastructure Group, Inc.

PURPOSE: The purpose of this application is to consider a Commission Permit for a Utility Substation, Transmission in the AR-1 (Agricultural-Rural 1) zoning district. When considering the application, the Planning Commission is asked to determine whether the general location, character, and extent of the proposed use are in substantial accord with the Comprehensive Plan.

RECOMMENDATION: Staff supports the Planning Commission’s **approval** of the Commission Permit for the following reasons:

1. The general location, character, and extent of the proposed transmission utility substation are in substantial accord with the Revised General Plan (Plan).
2. Plan policies support the expansion of existing non-agriculturally related commercial uses in the Rural Policy Area if the use is determined to be compatible in scale and intensity with the surrounding area, poses no serious threat to public health or safety and meets applicable performance standards.
3. The proposed transmission utility substation supports the objectives of the Strategic Land Use Plan for Telecommunication Facilities by providing modern, effective and efficient telecommunications infrastructure while mitigating impacts on the County’s residents, nearby land uses, and viewsheds.

CONTENTS OF THIS STAFF REPORT					
Section	Page	Section	Page	Section	Page
Motions	2	Policy Analysis	9	Utilities/Public Safety	12
Application Information	3	Land Use	9	Zoning Analysis	13
Context	3	Compatibility	9	Findings	13
Proposal	7	Environmental/Heritage	10	Attachments	14
Outstanding Issues	8	Transportation	12		

SUGGESTED MOTIONS:

1. I move that the Planning Commission approve CMPT-2016-0001, AT&T Short Hill, based on the Commission Permit Plat entitled "AT&T Expansion of Existing Telephone Transmission Utility Substation" prepared by Parsons, dated January 22, 2016, revised through March 29, 2016, with the Findings for Approval in the April 26, 2016 Planning Commission Public Hearing Staff Report and forward it to the Board of Supervisors for ratification.

OR

2. I move that the Planning Commission forward CMPT-2016-0001, AT&T Short Hill, to a work session for further discussion.

OR

3. I move that the Planning Commission deny CMPT-2016-0001, AT&T Short Hill, based on the following Findings for Denial:

I. APPLICATION INFORMATION	
APPLICANT Parsons Environment & Infrastructure Group, Inc. Wayne Barker, Principal Project Manager 4701 Hedgemore Drive Charlotte, NC 28209 301-461-0676 wayne.barker@parsons.com	REPRESENTATIVE Walsh Colucci Lubeley & Walsh, PC Christine Gleckner, Land Use Planner 1 East Market Street, Ste. 300 Leesburg, VA 20176 571-209-5776 cgleckner@thelandlawyers.com
REQUEST Parsons Environment & Infrastructure Group, Inc. of Charlotte, North Carolina, has submitted an application for Commission approval to expand an existing a transmission utility substation. This request would permit the construction of a 160,000 square foot communications building. The proposed use is listed as a Permitted use under Section 2-102 pursuant to Section 5-616, and requires a Commission Permit in accordance with Sections 5-616 and 6-1101.	
PARCELS/ACREAGE Tax Map //7/////////59/ (PIN# 477-38-7669) approximately 15.3 acre portion of an approximately 176.38 acre parcel (138.61 acres assessed)	
ACCEPTANCE DATE February 9, 2016	LOCATION On the west side of Short Hill Mountain, east of Neersville, on the east side of Harpers Ferry Road approximately 2.5 miles north of the intersection with Charles Town Pike (Route 9) and approximately 4,000 feet south of the intersection with Sagle Road (Rte 287)
ZONING ORDINANCE Revised 1993 Zoning Ordinance	EXISTING ZONING AR-1 (Agricultural – Rural 1) Mountainside Development Overlay District (MDOD)
POLICY AREA Rural Policy Area	PLANNED LAND USE Rural economy use and limited residential development (1 dwelling unit /20 acres)

II. CONTEXT

Location/Site Access – The subject property is located on the west side of Short Hill Mountain, east of Neersville, on the east side of Harpers Ferry Road approximately 2.5 miles north of the intersection with Charles Town Pike (Route 9) and approximately 4,000 feet south of the intersection with Sagle Road (Rte 287). Site access is proposed via White Rock Road, a private road within the subject property with a 16’ paved width.

The property is located in both the Blue Ridge Election District and the Catoclin Election District, as shown in Figure 1. However, all proposed work will be within the Blue Ridge District. The property’s existing driveway entrance onto Harpers Ferry Road is the only part of the property located in the Catoclin District.

Existing Conditions – The subject property is approximately 176.15 acres in size and is occupied by an existing manned communications facility that has been in operation on the property since the early 1960s. The site is served by an existing parking area (see Figure 3) and private road. The existing underground facility occupies an approximately 15.3 acre area of disturbed ground (identified by the Loudoun County soils GIS layer as “made lands”) near the ridgeline of Short Hill Mountain. The overburden from the grading, excavation and construction of the facility, which included large amounts of rock, was pushed over the side of the mountain to create the subject site as well as the roadway leading to the site and the pad site for the proposed communications building (see Figure 2).

Figure 1. Vicinity Map

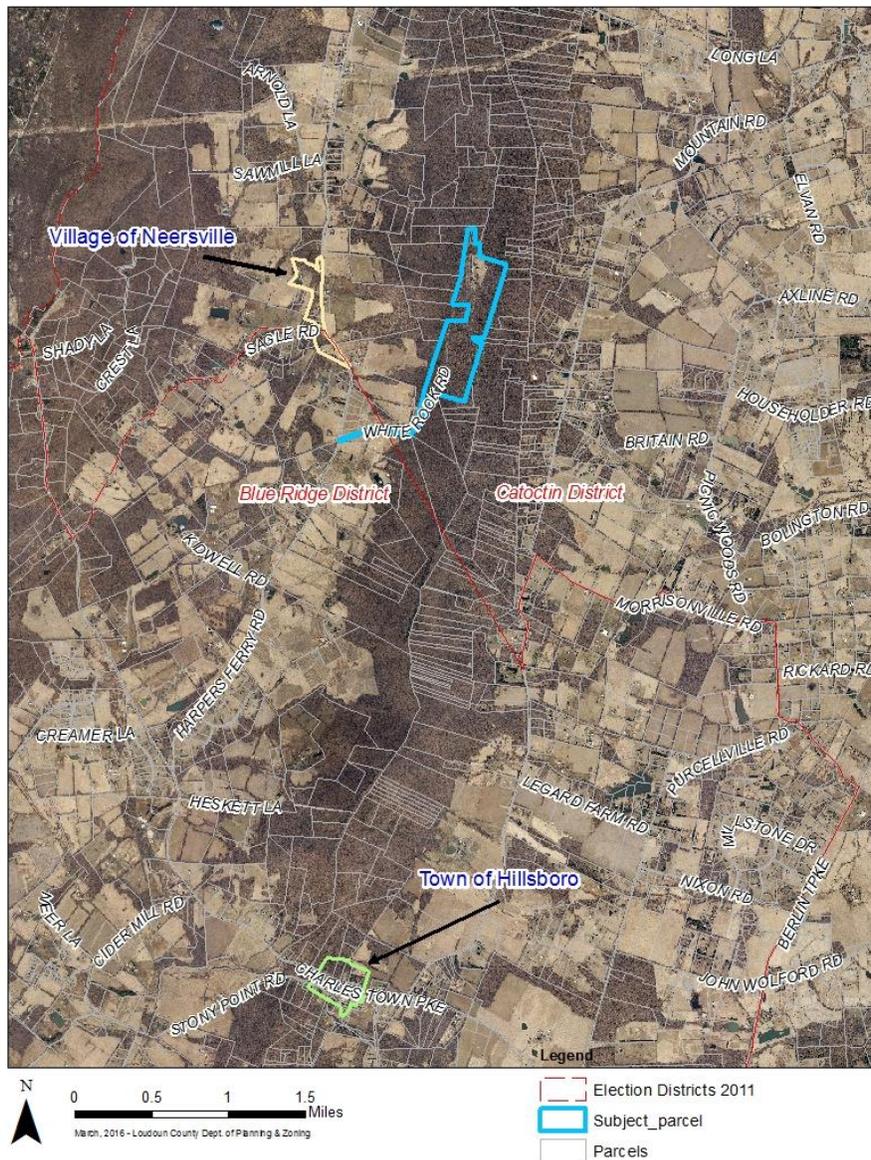


Figure 2. Existing Site



Figure 3. Existing Parking Area



The property includes areas of moderately steep and very steep slopes which are subject to the development requirements of Section 5-1508 of the Revised 1993 Zoning Ordinance (Ordinance). However, County GIS records indicate that the 15.3 acre subject site is designated as “made lands” (soil type MDL as shown on Sheet 4 of the CMPT Plat). As the steep slopes within the area of proposed development are not naturally occurring, the site is not subject to the steep slope regulations of the Ordinance.

Figure 4. Mountainside Development Overlay District



However, County GIS records indicate that the 15.3 acre subject site is designated as “made lands” (soil type MDL as shown on Sheet 4 of the CMPT Plat). As the steep slopes within the area of proposed development are not naturally occurring, the site is not subject to the steep slope regulations of the Ordinance.

The property is also located in the Mountainside Development Overlay District (MDOD) and is therefore subject to the development standards of Section 4-1600 (see Figure 4). A small portion of the proposed area of clearing and grading is inside the MDOD (Sensitive subdistrict).

With the exception of the previously cleared and graded area at the top of the site, the property is forested (see Figures 5 and 7). Disturbed areas on the western and eastern slopes (i.e. downhill from the 15.3 acre subject site) are vegetated and a portion of this slope area is dominated by invasive tree

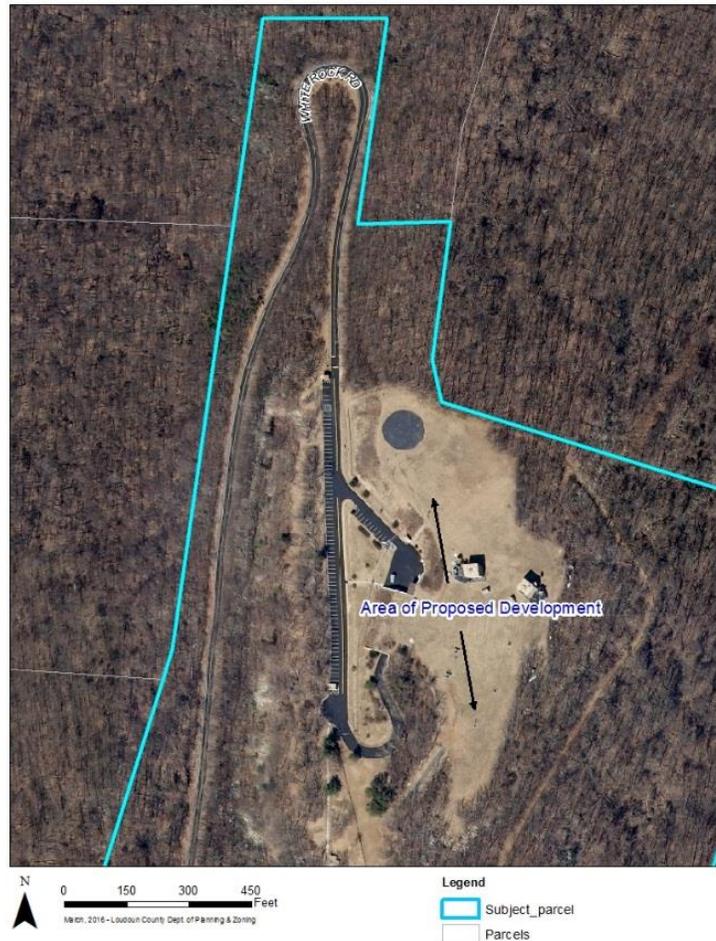
species intermixed with native trees. Sheet 8 of the CMPT Plat includes a tree survey narrative and tree canopy map. The applicant has committed to a long-term plan (described below) to remove and replace the invasive trees, many of which are dead or in decline.

There is no floodplain in the vicinity of the proposed expansion, and the County's Predictive Wetlands Model does not identify any wetlands on the property. Staff is not aware of any archaeological or historic features at the site.

Surrounding Properties –

Surrounding properties are zoned AR-1 (Agricultural-Rural 1) and are occupied by existing agricultural and single-family detached residential uses. Several of the adjacent properties are undeveloped, wooded parcels, including two adjacent lots owned by AT&T that are located to the west of the subject parcel. Examples of potential uses that could develop in the AR-1 zoning district include agriculture, agricultural support services such as wineries and equestrian facilities, single-family residential uses, public and institutional uses such as religious assembly and utilities, and commercial uses such as country inns and camps.

Figure 5. Aerial Photo of Site



Directions - From Leesburg, take Route 7 west to Route 9 west. Turn right onto Harpers Ferry Road (Rte. 671). The subject property is on the right, approximately 2.5 miles north of the intersection with Route 9.

Background – The site is occupied by an existing manned, underground facility containing communications switching equipment. The original facility, constructed in the early 1960s, was approved in 1963 by the County through a Commission Permit as described below. Per the applicant, various revisions and upgrades to the equipment on the site have occurred over the past decade.

CMPT-1962-2157 (also known as CMPT-1962-0003) – On March 26, 1963, the Planning Commission approved a Commission Permit for the establishment and operation of a communications facility with conditions of approval requiring the replanting of the mountainside area and painting of the buildings to mitigate the visual impact on the surrounding area.

SPEX-2004-0029 – On March 8, 2005, the Board of Supervisors approved a Special Exception for construction of a drip irrigation field to upgrade an existing onsite wastewater treatment system in sensitive and highly sensitive areas of the Mountainside Development Overlay District (MDOD).

As of March 28, 2016, one member of the public has provided comments about this application on LOLA. The comments, submitted by an adjacent property owner, addressed concerns regarding erosion, grading, and groundwater quality.

The applicant hosted a community meeting on March 14, 2016 at the Between the Hills Community Center to provide information about the proposed development to surrounding residents and property owners. Issues discussed included lighting, the visibility of the facility from nearby properties and roads, and traffic.

The application was initially submitted in the form of two special exception applications for the removal of non-conforming use status (SPEX-2015-0036) and expansion of an existing telecommunication facility (SPEX-2015-0037). However, Zoning Administration staff subsequently determined that the proposed land use met the Ordinance definition of “Utility Substation, Transmission”, which is a permitted use in the AR-1 district. As such, the two special exception applications were determined to be unnecessary. Because the proposed 160,000 square foot facility was not included in the 1962 Commission Permit application, a new Commission Permit is required for the expansion of the existing use.

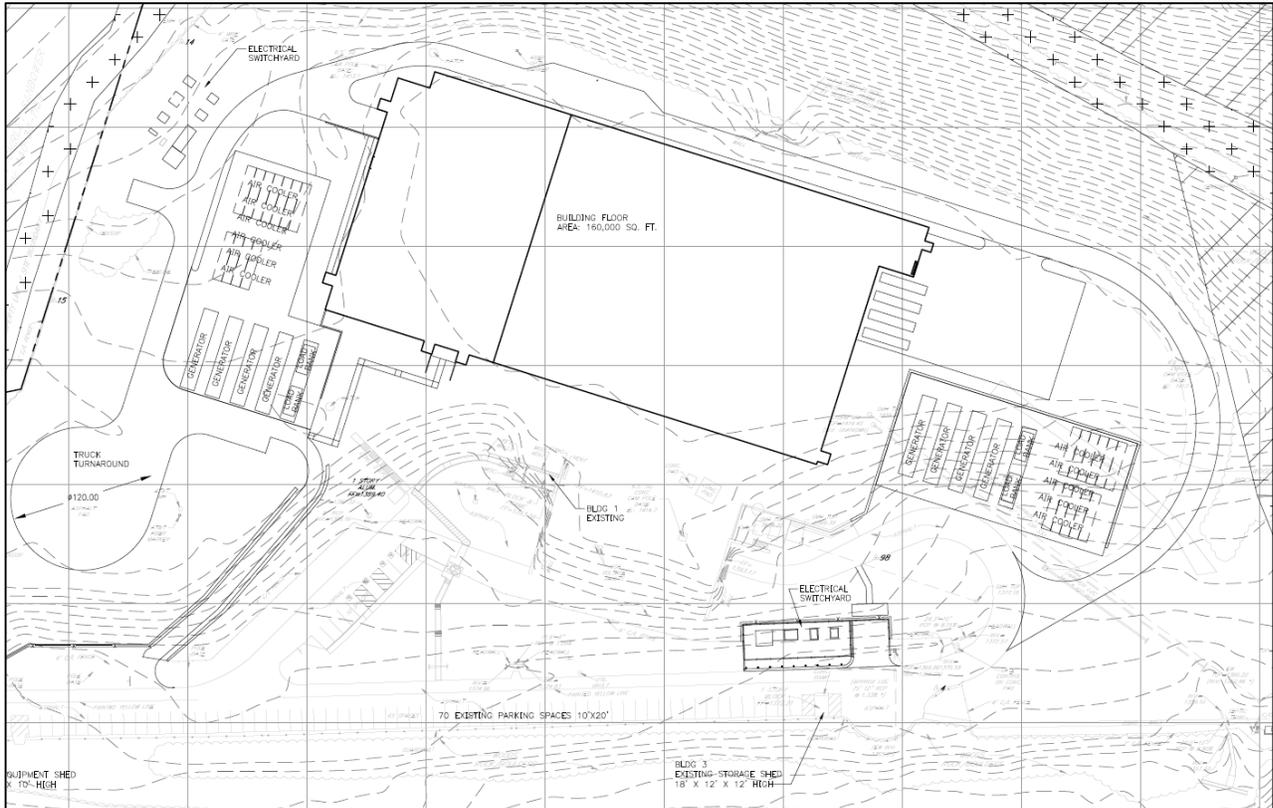
III. PROPOSAL

Commission Permit – The Applicant is proposing a telephone transmission utility substation on a 15.3 acre portion of the approximately 176.38 acre parcel. The purpose of the request is to install modern data transmission and processing equipment to support the continued operations of the facility. The proposed expansion would entail the construction of a 160,000 square foot building primarily containing mechanical and electrical equipment (see Figure 6). The height of the facility will vary from approximately 18’ for the one-story portion of the building to 35’ for the two-story portion of the building.

Per the applicant, the proposed building will also include a small area for operation and maintenance staff in addition to ancillary features such as spare parts room, bathrooms, and a receiving area with a loading dock. The interior of the existing building will also be upgraded. Sixty employees will work at the facility in three shifts per day, seven days per week. No changes are proposed to the existing parking area and driveway, which would continue to serve the site.

Emergency standby generators using diesel fuel would be located on the property. The applicant has stated that as a result of the location of these generators, noise at the property line will be minimal if at all detectable.

Figure 6. Overview of Proposed Development



The new building is proposed to be constructed directly above the existing underground facility on an area of made lands (or disturbed area) that was created from the grading, excavation and construction of the original facility. Per the applicant, the development would not entail substantial additional clearing and grading. Outside of the 15.3 acre subject site, the remainder of the property would remain as a wooded area.

According to the applicant's Statement of Justification, the facility will be minimally visible from Harpers Ferry Road and Mountain Road and is designed to blend into its surroundings. Lighting will be kept to the minimum required for safety and security. The applicant proposes to screen the new facility with existing vegetation as well as newly planted trees and landscaping.

IV. OUTSTANDING ISSUES

There are no outstanding Staff issues. The application is ready for Planning Commission action.

The review process for Commission Permits is unique under the Virginia State Code. Rather than providing a recommendation of approval or disapproval, the Commission takes action to either approve or deny a CMPT application. Within sixty (60) days after the Commission has acted or failed to act, the Board of Supervisors (Board) may either ratify

or overrule the Commission's decision by a vote of a majority of the membership thereof (Ordinance Section 6-1104).

V. POLICY ANALYSIS

Commission Permit (CMPT) Criteria for Approval - Ordinance Section 6-1103(A) states that when considering a Commission Permit, "The Planning Commission shall review the application to determine if the feature for which approval is sought is substantially in accord with the adopted Comprehensive Plan." Section 6-1101(A) further states, "No street or connection to an existing street, park or other public area, public building or public structure, public utility facility or public service corporation facility other than a railroad facility, whether publicly or privately owned, shall be constructed, established or authorized, unless and until the general location or approximate location, character and extent thereof has been submitted to and approved by the Planning Commission as being substantially in accord with the adopted Comprehensive Plan."

A. LAND USE

Analysis – There are no outstanding land use issues. The general location of the proposed utility substation is in substantial accord with the land use policies of the Plan. The property is located within the Rural Policy Area and is planned for 1 dwelling unit per 20 acres. Plan policies support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area if the use is determined to be compatible in scale and intensity with the surrounding area, poses no serious threat to public health or safety and meets applicable performance standards.

B. COMPATIBILITY

Analysis – The proposed expansion of the existing AT&T facility will not change the existing use or function of the facility; however, the proposed construction of the communications building on the ridgeline of the Short Hill Mountain will have a visual impact on the surrounding area.

While the existing forest cover may partially screen some views of the proposed communications facility, the upper portions of the building will be visible from a number of properties located further downslope in the valleys, as well as from Harpers Ferry Road (Route 671) and Mountain Road (Route 690).

Staff initially requested that the applicant consider lowering the height of the building to reduce the potential visual impact of the development. However, per the applicant, the proposed building height (up to 35') is the lowest feasible height based on site constraints and equipment requirements.

To address screening issues, the applicant proposes to supplement existing vegetation with newly planted trees and landscaping (see Sheet 7 of the CMPT Plat, "Proposed Landscape Plan"). Additionally, the applicant has committed to applying an irregular block

pattern of earth tone paint colors to the roof line to better blend with existing forest cover and the ridgeline of the mountain and to break up the building mass. Building Design Note 1 on Sheet 1 of the CMPT Plat identifies the color scheme for the building.

Photo simulations on Sheets 9-12 of the CMPT Plat show the projected visual impact of the facility as seen from Harpers Ferry Road (west face) and Mountain Road (east face).

Per the Exterior Lighting notes on Sheet 1 of the CMPT Plat, exterior lighting levels will be the minimum required for safety and security in order to reduce the visibility of lighting beyond the property line.

C. ENVIRONMENTAL AND HERITAGE RESOURCES

Analysis – The general location, character, and extent of the proposed electrical substation are in substantial accord with the environmental and heritage resource policies of the Plan. Staff has identified no outstanding environmental, archaeological, or historical resource issues with this Commission Permit application. The Land Use Pattern and Design Strategy Policies of the Rural Policy Area of the Plan call for the protection and enhancement of the County’s steep slopes, ridges, and mountains, and the CMPT Plat depicts a site layout that does not disturb naturally occurring steep slopes and minimizes impacts to mountainside areas. The stormwater management strategy for the proposed expansion will include Low-Impact Development (LID) methods. The CMPT plat identifies areas for reforestation and replacement of invasive tree species. The applicant has provided a letter from the Virginia Department of Historic Resources stating that the agency is unaware of any archaeological sites on the property.

1. Steep slopes

The property includes areas of moderately steep and steep slopes which are subject to the development requirements of Section 5-1508 of the Ordinance. However, County GIS records indicate that the 15.3 acre subject site is designated as “made lands” (MDL). As the steep slopes within the limits of clearing and grading for the proposed development are not naturally occurring, the site is not subject to the steep slope regulations of the Ordinance.

2. Mountainside Areas

The subject site is located on the ridgeline of Short Hill Mountain within the Mountainside Development Overlay District (MDOD). Mountainsides are highly sensitive to land disturbance and development, and uncontrolled land disturbance in these areas could contribute to the loss of prime viewsheds, the destruction of unique flora and fauna, and increased runoff to downstream rivers and streams (Revised General Plan, Chapter 5, Mountainside Areas, text). Plan policies call for minimizing negative environmental impacts and land disturbance in mountainside areas.

The 15.3 acre subject site was previously cleared and graded, and the new development proposed within this area will not impact the mountainside. Only a

small portion of the proposed area of clearing and grading is inside the MDOD, as shown on Sheets 4 and 5 of the CMPT Plat.

3. Stormwater Management

The applicant has sought to minimize the land disturbing activities on the site by restricting the building footprint to a previously cleared and graded portion of the subject site. However, the proposed construction of the building and road network will create a larger area of impermeable surfaces which could influence stormwater runoff if not properly managed and controlled onsite. During the review process, staff recommended that the applicant commit to integrating Low-Impact Development (LID) practices into the stormwater management strategy. LID strategies are intended to minimize the volume of surface runoff and reduce pollutants in order to better protect the integrity and water quality of receiving streams and water bodies.

A note on Sheet 1 of the CMPT Plat addresses stormwater management and states that the development will incorporate LID methods such as a combination of infiltration, bioretention, and rainwater harvesting and will be coordinated with the Department of Building and Development during site plan review for the facility.

4. Reforestation

Areas of made land on the slopes surrounding the 15.3 acre subject site are dominated by invasive tree species intermixed with native trees. The applicant has committed to a long-term Invasive Plant Mitigation Plan to remove and replace the invasive trees, and has agreed that this plan will be reviewed and approved by the Urban Forester prior to approval of the first site plan for this facility (see Sheet 7 of the CMPT Plat). The

applicant will replace invasive trees with native species, and will plant evergreens in higher percentage in locations where screening is a priority.

Figure 7. Forested Slope



5. Noise

The proposed use is not listed in the Ordinance as a land use to which the noise standards of Section 5-652 apply. However, eight emergency standby 4.0 MW medium voltage diesel generators and eleven air coolers are depicted on Sheet 5 of the CMPT Plat. The applicant has added a note to Sheet 1 of the CMPT Plat stating that the application will comply with the noise standards in Section 5-1507 of the Ordinance.

D. TRANSPORTATION

Analysis – The general location, character, and extent of the proposed utility substation are in substantial accord with the transportation policies of the 2010 Countywide Transportation Plan (2010 CTP) and the Bicycle & Pedestrian Mobility Master Plan (2003 Bike & Ped Plan). No traffic study is required for a Commission Permit application. The proposed utility substation does not conflict with any existing or planned CTP roadways. The proposed use will add minimal trips to the public roadway network and will not generate the need for transportation improvements.

White Rock Road is an unpaved, variable-width private driveway located wholly within the subject property that travels in a north-south direction along the western edge of the site. The road is maintained by the property owner and provides access to the public road network via an unsignalized intersection with Harpers Ferry Road. The Applicant does not propose any change in access from the public roadway network or site entrance, which has already been constructed. Because White Rock Road is a private driveway, there is no posted speed limit along this road.

Harpers Ferry Road (VA Route 671) (segment from the Charles Town Pike (VA Route 9) to Jefferson Pike (US Route 340)) is currently a two-lane undivided (R2) major collector roadway that travels in a north-south direction west of the subject property. Harpers Ferry Road is constructed to its ultimate condition per the 2010 CTP. The posted speed limit in the vicinity of the site is 55 MPH. Per 2014 Virginia Department of Transportation (VDOT) estimates, Harpers Ferry Road carries approximately 2,400 vehicles per day in the vicinity of the site.

The 2003 Bike & Ped Plan categorizes this section of Harpers Ferry Road in the Rural Policy Area as a “Baseline Connecting Road” along which bicycle and pedestrian facilities are envisioned. However, Appendix 6 of the 2010 CTP also notes that sidewalks will typically not be provided along rural road sections such as this segment of Harpers Ferry Road. Currently, there are no bicycle and pedestrian facilities constructed on either side of Harpers Ferry Road in the vicinity of White Rock Road.

The Applicant does not propose any change in access from the public roadway network or the White Rock Road driveway entrance, which has already been constructed. However, the Applicant needs to ensure that the access to White Rock Road from Harpers Ferry Road is constructed to current VDOT commercial entrance standards.

E. PUBLIC UTILITIES/PUBLIC SAFETY

Analysis – There are no outstanding public utilities issues. The utility substation is a manned facility and requires the provision of water and sewer. Sixty employees will work at the facility (three shifts per day).

The following table below summarizes how this application addresses public utilities, fire and rescue services, fire and rescue contributions, and public safety.

Table 1. Public Utilities and Public Safety.	Condition or Note
<u>Water and Sewer</u> – The property is currently served by an existing well and septic area. The existing well will continue to be the source of water for the site, and a proposed septic drainfield expansion area is shown on the CMPT Plat.	Not an issue.
<u>Fire & Rescue Service</u> - The Loudoun Heights Fire and Rescue Station (#26) would serve the subject property with an approximate response time of six minutes.	Not an issue.

VI. ZONING ANALYSIS

Analysis – There are no outstanding zoning issues. The application is in general compliance with the requirements of the Ordinance for the AR-1 zoning district wherein a Utility Substation, Transmission is permitted by right, subject to the performance standards of Section 5-616 of the Ordinance. Section 5-616 requires that the substation be located on a lot of one acre in size or greater, that the substation receive Commission approval, and that the substation has a minimum Type 4 Buffer Yard. The proposed substation meets these criteria as the subject property is approximately 176.38 acres in size (138.61 acres assessed), this application is for Commission approval, and a minimum Type 4 Buffer (existing vegetation with supplemental plantings) will be provided around the site.

VII. FINDINGS FOR APPROVAL

1. The general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation are in substantial accord with the Comprehensive Plan, specifically, the Rural Economy and Green Infrastructure policies of the Revised General Plan and will allow the continued use of an existing communications facility in operation for over fifty years.
2. The general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation are in substantial accord with the Countywide Transportation Plan and the Bicycle & Pedestrian Mobility Master Plan, as the proposed development does not conflict with any existing or planned CTP roadways, will add minimal trips to the public roadway network and will not generate the need for transportation improvements.
3. The proposed expansion of the existing telephone transmission utility substation is in general compliance with the AR-1 (Agricultural-Rural 1) regulations of the Revised

1993 Zoning Ordinance. The layout shown on the CMPT Plat demonstrates that the proposed uses can comply with the Additional Regulations for Utility Substations set forth in Section 5-616 of the Ordinance.

4. The proposed expansion of the existing telephone transmission utility substation will provide modern, effective and efficient telecommunications infrastructure and enhance the overall communications network within the County, to the benefit of area residents, businesses, and governments. The proposed expansion would mitigate impacts on the County’s residents, nearby land uses, and viewsheds and would support the objectives of the Strategic Land Use Plan for Telecommunication Facilities.

VII. ATTACHMENTS		PAGE NUMBER
1	Review Agency Comments	
1a	Planning & Zoning, Comprehensive Planning	A-1
1b	Planning & Zoning, Zoning Administration	A-12
1c	DTCI, Transportation Planning & Operations Division	A-11
1d	Department of Building and Development, Urban Forester	A-18
1e	Department of Building and Development, Natural Resources Division	A-34
1f	Department of Fire, Rescue and Emergency Management	A-37
1g	Virginia Department of Transportation	A-38
1h	Health Department	A-39
2	Applicant’s Statement of Justification	A-41
3	CMPT Plat (03-XX-16)	A-45
*This Staff Report with attachments (file name PCPH STAFF REPORT 04-26-16.PDF) can be viewed online on the Loudoun Online Land Applications System (LOLA) at www.loudoun.gov . Paper copies are also available in the Department of Planning and Zoning.		

County of Loudoun
Department of Planning and Zoning

MEMORANDUM

DATE: November 25, 2015

TO: File: SPEX 2015-0036 and SPEX 2015-0037

FROM: Pat Giglio, Planner III, Community Planning

**SUBJECT: SPEX 2015-0036 AT&T Removal of Non-Conforming Status
SPEX 2015-0037 AT&T Telecommunication Expansion**

EXECUTIVE SUMMARY

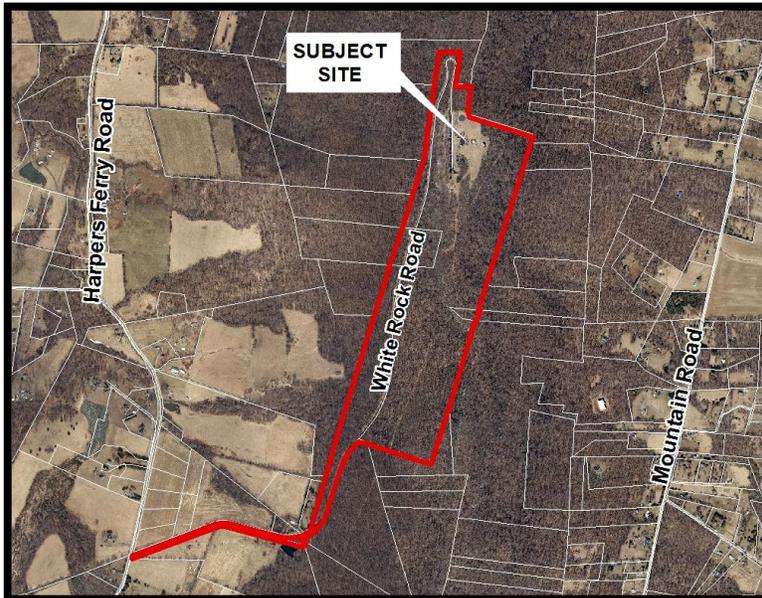
The Applicant, AT&T of Virginia, has submitted an application for a special exception to expand the existing telecommunications facility use on the 176.15 subject property located on Short Hill Mountain, west of Neersville. The application would permit the construction of a 161,000 square foot communications building to house modern data transmission and processing equipment on the 15.3 acre subject site to support the continued operation of the facility which was approved and constructed in the early 1960s. The property is zoned AR-1(Agricultural Rural-1) and is located in the Mountainside Development Overlay District (MDOD). The area is governed by the policies of the Revised General Plan and is located within the Rural Policy Area. Plan policies support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area by Special Exception subject to performance standards to ensure compatibility with the rural land use pattern.

Community Planning staff has reviewed the submitted materials and finds the application lacks sufficient detail to fully evaluate the application's conformance with the policies of the Revised General Plan. Community Planning staff is unable to recommend approval of the Special Exception application at this time and requests additional information and commitments pertaining to building design, mitigation of visual impacts, landscape buffering, reforestation and tree conservation, mountainside protection, and stormwater management to evaluate and demonstrate the applications conformance with Plan policies.

BACKGROUND

The approximately 176.15 acres subject property is located on the east side of Harper's Ferry Road (Route 671), north of Neersville on Short Hill Mountain at 12355 White Rock Road. The subject property is occupied by an existing

manned communications facility that has been in operation on the property since 1960s. The existing underground facility occupies an approximately 15.3 acres area of made land on the ridge of Short Hill Mountain. The overburden from the grading, excavation and construction of the facility, which included large amounts of rock, was pushed over the side of the mountain to create the made lands which includes the roadway leading to the subject site and the current pad site for the proposed communications building.



The application proposes to add a one-story, 161,000 square foot communications building to house modern data transmission and processing equipment to support the continued operation of the facility. The proposed communications building will be located on a relatively flat graded area proximate to the existing manned communications facility. The previously constructed road access,

driveway and parking areas located to the west of the proposed communications building will be used by the employees of the expanded facility. It is anticipated that sixty employees covering three shifts will work at the expanded facility.

The applicant has requested to use the existing forest cover to screen and buffer the proposed communications building, however, much of the forest cover located on the made slopes surrounding the site is either in poor health or comprised of invasive species such as Ailanthus. While the existing forest cover may partially screen some views of the proposed communications facility, the upper portions of the building will be visible from a number of properties located further downslope in the valleys, as well as from Harper's Ferry Road (Route 671) and Mountain Road (Route 690); which are designated Virginia Byways.

The subject property is zoned AR-1 (Agriculture Rural-1) and is governed under the provisions of the Revised 1993 Zoning Ordinance. The subject site is located on the ridge line of Short Hill Mountain within the Mountainside Development Overlay District (MDOD). A review of County GIS records indicates that the 15.5 acre subject site is designated as made lands (MDL) and as such is not subject to the steep slope regulations of the Zoning Ordinance. No archeological or historic resources were identified on the subject site.

COMPREHENSIVE PLAN CONFORMANCE

The Revised General Plan places the property within the northern tier of the Rural Policy Area. The area is planned for rural economy uses and limited residential development at a density of 1 dwelling unit per 20 acres (Revised General Plan, Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 3).

LAND USE

The existing AT&T facility on the subject site was approved by the County through a Commission Permit (CMPT 1962-2157) on April 17, 1962 for the establishment and operation of a communications facility, that was later reaffirmed on March 26, 1963 with conditions of approval requiring the replanting of the mountainside area and painting of the buildings to mitigate the visual impact on the surrounding area. A Special Exception, (SPEX 2004-0029 AT&T Facility) was approved by the County on March 8, 2005 to repair/replace the existing sewage treatment and wastewater disposal system for the facility which included the installation of drip irrigation system in Mountainside Overlay District (MDOD). The current Special Exception request would permit the construction of a one-story, 161,000 square foot communications building to house modern data transmission and processing equipment to support the continued operation of the facility.

The policies of the Revised General Plan support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area by Special Exception if the use is determined to be compatible in scale and intensity with the surrounding area, poses no serious threat to public health or safety and meet applicable performance standards (Revised General Plan, Chapter 7, Rural Economy Policies, Policies 14 and 16). The existing communications facility and the proposed communications building are one component of a larger network of infrastructure that provides telecommunications service to the County, the region and the government. The County has identified the provision of reliable wireless telecommunications and broadband service as critical infrastructure for the development and support of businesses and the daily activities of residents in the County.

Analysis

The County's land use policies support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area by Special Exception subject to performance standards. Further evaluation of the overall compatibility of the proposed use and potential environmental impacts are needed to evaluate the application's conformance with the policies of the Revised General Plan.

COMPATIBILITY

The policies of the Revised General Plan support the establishment of business uses in the Rural Policy Area that are compatible in scale, use, and intensity with the dominant rural land use pattern, preserve the rural character of the landscape, and promote opportunities for the expansion of the County's rural economic as well as environmental goals (*Revised General Plan, Chapter 7, Rural Economy Policies, Policies 2 and 3*). The Plan specifies that these rural businesses should meet "established performance criteria, including traffic capacity limits, employee limits, site design standards (i.e. buffering, use intensity, siting, architectural features) and pose no threat to public health, safety and welfare" to ensure their compatibility with the character of the surrounding rural area (*Revised General Plan, Chapter 7, Land Use Pattern and Design Strategy Policies, Policy 6, p.7-8*).

The expansion of the existing AT&T facility with the construction of the proposed one-story, 161,000 square foot communications building will not change the existing use or function of the facility and will not require an increase in the number of employees. All the existing internal road network, parking areas, water and wastewater infrastructure currently on the property will be utilized to support the proposed communications building and expanded operations of the facility. While the operational scale and intensity of the use on the subject property remains unchanged, the proposed construction of the one-story communications building on the ridgeline of the Short Hill Mountain will have a visual impact on the surrounding area.

Plan policies call for the visual impact of commercial public telecommunication facilities to be mitigated so as to blend with the natural and built environment of the surrounding area (*Telecommunications Plan, Design Standards, Countywide Visual Impact, Policy 1*). Specifically the Plan call for the use of appropriate color, texture of materials, topography, scale of buildings, landscaping and visual screening to mitigate the visual impact of commercial public telecommunication facilities (*Telecommunications Plan, Design Standards, Countywide Visual Impacts, Policy 3*). The applicant in their statement of justification has committed to painting the proposed building a "soft tone coloring", maintaining the existing perimeter forest cover and providing additional plantings to fill gaps in the existing vegetation. The application includes a drawing of the footprint of the proposed communications building but does not provide any information on the materials, design or height of the building. The applicant has submitted photo simulations, depicting views of the proposed communications building from locations on Harper's Ferry Road (Route (671) and Mountain Road (Route 690) on the valley floor to illustrate the potential visual impact on surrounding properties (Sheet 8 & 9).

Staff has reviewed the submitted drawings and photo simulations and requests additional information from the applicant describing the design and color scheme for the proposed communications building to ensure it blends with the surrounding forest cover and landscape. Staff recommends that the roof height of the proposed communications building be the lowest possible to minimize the silhouette of the building on the ridgeline and that the building be painted in a non-reflective matte dark brown or black/green color to blend with surrounding forest cover. Also opportunities exist for reforestation with supplemental planting of native species in and around the proposed communications facility on the made slopes that comprise the subject site which could also provide additional screening to soften views of the proposed building from views in the valleys. The existing forest areas on the made slopes should also be designated as tree conservation areas (TCAs) and conditions should be developed to ensure the protection and long term maintenance of these trees as a permanent landscape buffer.

Analysis

The proposed expansion of the existing AT&T facility will not change the existing use or function of the facility, however the proposed construction of the one-story communications building on the ridgeline of the Short Hill Mountain will have a visual impact on the surrounding area.

Staff recommends that the roof height of the proposed communications building be the lowest possible or the building be imbedded into slope to minimize the silhouette of the building on the ridgeline and that the building be painted in a non-reflective matte dark brown or black/green color to blend with surrounding forest cover.

Staff recommends that the area in and around the proposed communications facility on the made slopes that comprise the subject site be reforested with supplemental planting of native species to provide additional screening to soften views of the proposed building from views in the valleys. Staff recommends that these existing forested areas on the made slopes also be designated as tree conservation areas (TCAs) and that conditions be developed to ensure the protection and long term maintenance of these trees as a permanent landscape buffer.

MOUNTAINSIDE AREAS

The County's mountains and mountainside areas contribute to its beauty, quality of life, and geologic uniqueness, and are valued by both residents and visitors (*Revised General Plan, Chapter 5, Mountainside Areas, text*). Mountainsides are highly sensitive to land disturbance and development, and uncontrolled land disturbance in these areas could contribute to the loss of prime viewsheds, the destruction of unique flora and fauna, and increased runoff to downstream rivers

and streams (*Revised General Plan, Chapter 5, Mountainside Areas, text*). Plan policies call for using performance standards and regulation to minimize negative environmental impacts and land disturbance in mountainside areas, and encourage mountainside areas to be placed under permanent open space easement (*Revised General Plan, Chapter 5, Mountainside Areas, Policies 3 and 4*). The subject site is located on the ridgeline of Short Hill Mountain, and as such, special care and consideration should be taken when developing the site in order to avoid and mitigate potential environmental impacts in conformance with Plan policies.

Analysis

The subject site is located on the ridgeline of Short Hill Mountain in an area designated by the County as the Mountainside Development Overlay District (MDOD). Staff defers to the Department of Building and Development for further review of the proposed construction plans within the MDOD for conformance with the County environmental policies and requirements.

STORMWATER MANAGEMENT

Plan policies call for appropriate standards to protect natural streams and drainages from the harmful effects of increased stormwater volume and velocity resulting from development (*Revised General Plan, Chapter 5, Surface Water Policies, Policy 5*). The County encourages new developments to incorporate low impact development (LID) techniques which integrate hydrologically functional designs that minimize the volume of surface water run-off and reduces pollutants to better protect the integrity and water quality of the receiving streams and water bodies (*Revised General Plan, Chapter 5, Surface Water Policies, Policy 17*). LID uses natural vegetation and small-scale treatment systems to treat and infiltrate rainfall close to the source. LID's goal is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain stormwater runoff. LID locates water quality measures at the closest possible proximity to proposed impervious areas (*Revised General Plan, Chapter 5, Surface Water Policies, Policy 2*).

The County recognizes that soil erosion and deposits of sediment from stormwater run-off is the single largest contributor to degradation of stream water quality and loss of aquatic habitat. The subject site drains to Piney Run, Duthman's Creek and the Catoctin Creek watershed via Milltown Creek. All three streams have suboptimal habitat data points identified by the 2009 Countywide Stream Assessment Project downstream of the subject site.

The application has sought to minimize the land disturbing activities on the site by restricting the building footprint to a previously cleared and graded portion of the subject site on made lands. However, the proposed construction of the building and road network will create a larger area of impermeable surfaces which could influence stormwater run-off if not properly managed and controlled onsite. The submitted drawings do not provide any information on the proposed stormwater management facilities for the subject site.



View North of Subject Site

Analysis

The application does not provide any information on the proposed stormwater management facilities for the subject site. Staff recommends the applicant commit to integrating low impact development (LID) practices, such as water quality swales, bioretention facilities/rain gardens, sheet flow to vegetative buffers, or any alternative LID practice acceptable to the Department of Building and Development to minimize the volume of surface water run-off on the subject site. Staff recommends the Applicant coordinate with the Department of Building and Development to determine what types of Stormwater Management/Best Management Practices (SWM/BMPs) may be required on the subject site and what types of LID techniques may be appropriate.

RECOMMENDATIONS

Community Planning staff is unable to recommend approval of the Special Exception application at this time and requests additional information and commitments pertaining to building design, mitigation of visual impacts, landscape buffering, reforestation and tree conservation, mountainside protection, and stormwater management to fully evaluate and demonstrate the applications conformance with policies of the Revised General Plan.

Staff would be happy to meet with the applicant to discuss any comments or questions.

Cc: Ricky W. Barker, AICP, Director, Planning and Zoning- via email
John Merrithew, AICP, Assistant Director, Planning and Zoning- via email

County of Loudoun
Department of Planning and Zoning
MEMORANDUM

DATE: February 29, 2016

TO: Steve Barney, Project Manager, Land Use Review

FROM: Pat Giglio, Planner III, Community Planning

SUBJECT: CMPT 2016-0001 AT&T Short Hill, 2nd Referral

BACKGROUND

The Applicant, AT&T of Virginia, had submitted an application for a Special Exception (SPEX 2015-0036 & SPEX 2015-0037) to expand the existing communications facility use on the 176.15 acre subject property located on Short Hill Mountain, west of Neersville that has operated on the site since the early 1960s.

Since the submission of the application and completion of first referral comments, County Zoning Administration Staff has determined that the proposed use on the subject property is defined as a "Utility Substation Transmission" in the Revised 1993 Loudoun County Zoning Ordinance which is listed as a permitted use in the AR-1 zoning district and therefore Special Exception approval is not required for the use. However, it was also determined that the previously approved Commission Permit (CMPT 1962-2157) for the existing AT&T facility on the subject property did not consider the 161,000 square foot one-story above-ground facility proposed with the current application, and as such a Commission Permit is required for the proposed expansion of the telephone transmission utility substation.

The applicant has responded to Community Planning's first referral comments dated November 25, 2015 and has amended the application to request Commission Permit (CMPT) approval for the proposed expansion of the telephone transmission utility substation use on the subject property.

In the first referral Community Planning Staff had requested additional information and commitments pertaining to building design, mitigation of visual impacts, landscape buffering, reforestation and tree conservation, mountainside protection, and stormwater management to evaluate the application's conformance with Plan policies.

Building Design/Visual Impact. The applicant in response to first referral comments has confirmed that the proposed one-story building height (35') is the lowest possible and has provided photo-simulations of the building painted with a block pattern of earth tone colors with a lighter color near the roof to better blend with the surrounding forest cover and sky to break up the mass of the building (Sheet 9-12). The photo-simulations illustrate how the building may appear from various vantage points in the surrounding valleys. Based on the photo-simulations it appears that the lighter paint color near the roof line is silhouetted above and through the existing tree line and does not achieve the desired camouflaging effect for the building.

1. The applicant may consider eliminating the lighter paint color and extend the irregular block pattern of earth tone paint colors to the roof line to better blend with existing forest cover and the ridgeline of the mountain.
2. The applicant may consider including a plat note to avoid confusion in the future describing the proposed earth tone color palette and blocked paint scheme for the building.

Landscaping/Environmental: In response to first referral comments the revised application includes a proposed landscape plan (Sheet 7) depicting areas for replanting and reforestation with native tree species to include deciduous and evergreen trees along the slopes surrounding the existing communications facility and proximate to the proposed one-story building. The plat notes include a list of native tree plantings which will be utilized on the site and specify that a higher percentage of evergreen trees shall be used where screening is a priority. The plat notes on the proposed landscape plan also describe an invasive species mitigation plan for the subject site, but only identifies a long narrow area adjoining the existing parking lot where invasive species are to be controlled. The applicant should consider an invasive species mitigation plan and replanting plan for all the made lands which comprise the subject site where invasive species are most prevalent. Elimination of invasive species and replanting with native species will ensure the long term sustainability of the forest cover on the subject site.

1. The proposed use of native species is supported by environmental policies of the Plan and the landscape plan as presented will aid in softening views of the proposed one-story building.
2. The applicant may consider an invasive species mitigation plan and replanting plan for all the made lands to ensure the long term sustainability of the forest cover on the subject site.

3. The applicant has committed to a stormwater management plan that includes low impact development (LID) practices and a lighting plan that eliminates unnecessary and intrusive light trespass in conformance with the environmental policies of the Plan (Sheet 1).

RECOMMENDATION

Community Planning Staff finds the general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation use on the subject property is in conformance with the Comprehensive Plan and supports approval of the Commission Permit.

Cc: Ricky W. Barker, AICP, Director, Planning and Zoning-via email
Chris Garcia, AICP, Program Manager Community Planning, Planning and Zoning-via email

Barney, Steve

From: Giglio, Patrick
Sent: Friday, March 18, 2016 8:43 AM
To: Barney, Steve
Cc: Garcia, Christopher
Subject: CMPT 2016-0001 AT&T Short Hill- 3rd Referral

Steve
Community Planning Staff has reviewed the most recent submission and notes that that the applicant has eliminated the sky blue color proposed near the roof line of the proposed building (sheets 9-12 revised 03/07/16) to better blend with forest cover, however, a plat note has not been included describing the proposed color palette and/or block paint scheme as recommended by staff. The applicant in a subsequent conversation with Community Planning Staff on March 17, 2016 has committed to adding a plat note describing the varied blocked paint scheme and a color palette consisting of earth tone colors as depict in the illustratives. Also in response to comments by county staff the applicant has expanded the area for the long term invasive plant mitigation plan to include the made lands on the property. Community Planning Staff has no additional comments and supports approval of the Commission Permit application.

Pat Giglio, Planner III
Loudoun County Department of Planning and Zoning
1 Harrison Street SE, 3rd Floor, MSC #62
Leesburg VA 20175
(703) 737-8563 (direct)
Visit us on the web: <https://www.loudoun.gov/planningandzoning>

COUNTY OF LOUDOUN
DEPARTMENT OF PLANNING AND ZONING
MEMORANDUM

DATE: December 11, 2015

TO: Pat Giglio, Project Manager

FROM: Brian Fish, Planner, Zoning Administration

CC: Mark Stultz, Zoning Administrator

CASE NUMBER AND NAME: SPEX-2015-0036, AT&T Removal of Nonconforming Use
SPEX-2015-0037, AT&T Telecommunication Expansion

TAX/MAP PARCEL NUMBER: //7////////59/

MCPI: 477-38-7669

The subject property contains 138.61 acres and is zoned Agricultural Rural - 1 (AR-1) under the Revised 1993 Loudoun County Zoning Ordinance (“Zoning Ordinance”). A large portion of the property is within the Mountainside Development Overlay District (MDOD) and is subject to the additional development standards and restrictions contained in Section 4-1600 of the Ordinance. The property also contains large areas of very steep and moderately steep slopes that are subject to the additional development standards and restrictions contained in Section 5-1508 of the Ordinance.

The subject applications propose the expansion of an existing telecommunications facility on the subject property. At the time the use was established the property was subject to the 1959 Loudoun County Zoning Ordinance (“1959 Ordinance”). Pursuant to the Use Table of the 1959 Ordinance, *Public utility, whether publicly or privately owned*, is a use permitted only with an approved Commission Permit. The existing facility received Commission Permit approvals on April 17, 1962, and March 26, 1963.

On June 21, 1972, the 1972 Loudoun County Zoning Ordinance (“1972 Ordinance”) became effective and the 1959 Ordinance was repealed. Pursuant to Section 602.3.11 of the 1972 Ordinance, *structures and uses required for the operation of a public utility except uses involving extensive storage or storage as a primary purpose* are only permitted with an approved special exception. However, Article 8 of the 1972 Ordinance, which deals with non-conformities, states in Section 806 that “any use which is permissible as a special exception in a district under the terms of this ordinance shall not be deemed a non-conforming use in such district, but shall without further action be considered a conforming use.” The existing telecommunications use on the subject property was therefore considered to be a conforming use at that time.

The current Zoning Ordinance became effective on January 6, 2003. The subject property is within the AR-1 zoning district. Pursuant to Table 2-102 of the Zoning Ordinance, *telecommunications antenna*, *telecommunications monopole*, and *telecommunications transmission tower* are uses which are only permitted within the AR-1 zoning district with an approved special exception. However, pursuant to Section 1-103(F)(3) of the Zoning Ordinance, any lawfully existing use which shall become a special exception use in the district in which it is located shall be deemed to have special exception approval. Expansion of such use shall require a new special exception approval. Therefore, an existing telecommunications use on the property would be deemed to have special exception approval and would not be a non-conforming use; therefore, no special exception is necessary to remove any nonconformity. However, a special exception is still required for any expansion of the existing use.

Staff has reviewed the Statement of Justification (SOJ), dated October 6, 2015, and Special Exception Plat, dated August 27, 2015, and revised through October 5, 2015, and offers the following comments:

I. CRITICAL ISSUE – STATUS OF EXISTING USE:

The Zoning Ordinance defines *Telecommunications Use and/or Structure* as “a use provided by or a structure utilized by a public service utility or commercial public telecommunications service under the jurisdiction of the Virginia State Corporation Commission and/or licensed by the Federal Communications Commission to provide commercial public telecommunications services. A telecommunications structure may include a tower, monopole, antenna hub site, and other antenna support structure or equipment buildings. Telecommunications use and/or structure does not include non-commercial applications, such as amateur radio operations. Telecommunications use and/or structure does not include those uses or structures that are accessory to and solely used by an individual business.” There does not appear to be any monopole or antenna remaining on the subject property. If the telecommunications use has been discontinued for a period of two years or more, the special exception approval is no longer valid and the use may not be re-established without the approval of a new special exception. The Applicant should provide additional information regarding the status of the existing use and explain more clearly how it meets the definition of *Telecommunications Use and/or Structure*.

The Zoning Ordinance defines *Data Center* as “a facility used primarily for the storage, management, processing, and transmission of digital data, which houses computer and/or network equipment, systems, servers, appliances and other associated components related to digital data operations. Such facility may also include air handlers, power generators, water cooling and storage facilities, utility substations, and other associated utility infrastructure to support sustained operations at a data center.” The facilities proposed with this application appear to be a *Data Center* rather than a *Telecommunications Use and/or Structure*. A *Data Center* is not a permitted use in the AR-1 zoning district. The Applicant should provide additional information regarding the proposed facility and explain how it is a *Telecommunications Use* rather than a *Data Center*.

II. STEEP SLOPE STANDARDS - SECTION 5-1508

The subject property contains large areas of steep slopes that are subject to the Steep Slope Standards contained in Section 5-1508 of the Zoning Ordinance. All land development applications and land disturbing activities on any parcel of land which includes within its boundaries very steep slope areas must comply with the Facilities Standards Manual and the standards contained in Section 5-1508(E) of the Zoning Ordinance.

III. MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT

The subject property contains large areas of highly sensitive and sensitive mountainsides that are within the Mountainside Development Overlay District and are subject to the development standards contained in Section 4-1600 of the Zoning Ordinance.

IV. BUFFERING AND SCREENING

Buffering and Screening are required pursuant to Section 5-1400 of the Zoning Ordinance. Type 4 Buffer Yards are required on all side of the proposed use. The Applicant states that the facility will be screened with existing vegetation as well as supplemental plantings. While there is sufficient existing vegetation on the site to fulfill the Buffer Yard requirements, staff is concerned that the location of the proposed facility on top of the ridge will make effective screening of the structure challenging. The Applicant should provide additional information regarding landscaping plans and supplemental plantings to demonstrate how they will provide effective screening of the proposed facility.

V. SPECIAL EXCEPTION ISSUES FOR CONSIDERATION

Section 6-1309.

- (1) *Whether the proposed minor special exception / special exception is consistent with the Comprehensive Plan.*** Zoning defers to Community Planning in the Department of Planning regarding this issue.
- (2) *Whether the level and impact of any noise, light, glare, odor or other emissions generated by the proposed use will negatively impact surrounding uses.*** All use of the proposed facilities will be subject to the Noise Standards contained in Section 5-1507 of the Ordinance. All lighting on the property will be subject to the Light and Glare Standards contained in Section 5-1504 of the Ordinance.
- (3) *Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and on adjacent parcels.*** Properties adjacent to the subject property are agricultural and residential with single-family detached dwellings.
- (4) *Whether the proposed special exception adequately protects and mitigates impacts on the environmental or natural features including, but not limited to, wildlife habitat,***

vegetation, wetlands, water quality including groundwater), air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands. The Statement of Justification submitted by the Applicant states that there are no archeological, historic, or agricultural features on the site. The Applicant states that the site of the proposed facilities is an already disturbed portion of the property and that the facility is designed to mitigate environmental issues.

- (5) *Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.*

- (6) *Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities.* The Statement of Justification submitted by the Applicant states that the property is served by on-site water and wastewater utilities, and generates minimal traffic.

COUNTY OF LOUDOUN
DEPARTMENT OF PLANNING AND ZONING
MEMORANDUM

DATE: February 10, 2016

TO: Steve Barney, Project Manager

FROM: Brian Fish, Planner, Zoning Administration 

CC: Mark Stultz, Zoning Administrator
Chris Mohn, Deputy Zoning Administrator

CASE NUMBER AND NAME: SPEX-2015-0036, AT&T Removal of Nonconforming Use
SPEX-2015-0037, AT&T Telecommunication Expansion

TAX/MAP PARCEL NUMBER: //7////////59/

MCPI: 477-38-7669

After further review and discussion with the Applicant, it has been concluded that the use proposed by the subject application is *Utility Substation, Transmission*. The Revised 1993 Loudoun County Zoning Ordinance ("Zoning Ordinance) defines *Utility Substation, Transmission*, as "A facility primarily serving as part of a regional interconnecting grid system which provides for the transformation, switching and distribution of both transmission voltage and/or distribution voltages, transmits natural gas, television or **telephone signals** [emphasis added]. Such use may include a distribution and/or dedicated substation". The subject application proposes the expansion of an existing telephone switching facility (originally constructed in the early 1960's) by the installation of modern data transmission and processing equipment to support the continued operation of the switching facility.

A *Utility Substation, Transmission*, is a permitted use in the AR-1 zoning district subject to the additional regulations contained in Section 5-616 of the Zoning Ordinance. Therefore, no special exception is required for the proposed use. Please note that this is not an official Zoning Determination, as no formal request for a Zoning Determination has been submitted.

Section 5-616(C) states that a Commission Permit shall be required unless the utility substation is specially delineated in the Comprehensive Plan. The subject application is proposing an expansion of the existing use which was not considered or included in the original Commission Permit application in 1962; therefore, a new Commission Permit is required for the proposed expansion of the existing use. Commission Permit (CMPT) 2016-0001 has been assigned to the subject application.

COUNTY OF LOUDOUN
DEPARTMENT OF PLANNING AND ZONING
ZONING ADMINISTRATION REFERRAL

RECEIVED

MAR 02 2016

LOUDOUN COUNTY
DEPARTMENT OF PLANNING & ZONING

DATE: March 2, 2016
TO: Steve Barney, Project Manager
Department of Planning and Zoning
FROM: Brian Fish, Zoning Planner 
CC: Chris Mohn, Deputy Zoning Administrator
CASE NUMBER & NAME: Commission Permit (CMPT) 2016-0001 – AT&T Short Hill
(Second Submission)
TAX MAP/MCPI: //7////////59/ 477-38-7669

1. The General Note under the Zoning Requirements – Overlay Zoning Districts on Sheet #1 should be revised to state that the areas of MDOD are subject to the requirements of the *Revised 1993 Loudoun County Zoning Ordinance*.

County of Loudoun

Department of Transportation and Capital Infrastructure

MEMORANDUM

DATE: November 18, 2015

TO: Kate McConnell, AICP, Project Manager
Department of Planning and Zoning

FROM: Marc Dreyfuss, Transportation Planner *MD*
DTCI, Transportation Planning & Operations Division

SUBJECT: **SPEX 2015-0036 – AT&T Removal of Non-Conforming Use**
SPEX 2015-0037 – AT&T Telecommunication Expansion
First Referral

Background

These Special Exception (SPEX) applications propose to remove the non-conforming use status of an existing telecommunications facility and allow the expansion of an existing telecommunications facility. The 15.3-acre site is a portion of a deeded 176.83-acre (138.61-acres assessed) parcel located along White Rock Road, a private road located within the subject property that joins the public road network at Harpers Ferry Road (VA Route 671) more than two miles to the south of the SPEX area. The subject property is zoned AR-1 (Agricultural Reserve – 1) under the *Revised 1993 Zoning Ordinance*. Access to the site exists via White Rock Road which connects the site to the public roadway network via an unsignalized intersection with Harpers Ferry Road. The Applicant does not propose any changes to the public road network in these applications. A vicinity map is provided as **Attachment 1**.

Department of Transportation and Capital Infrastructure (DTCI) review of these applications is based on materials received from the Department of Planning and Zoning on October 16, 2015, including: (1) an Information Sheet, dated October 16, 2015; (2) a Statement of Justification prepared by the Applicant, dated October 6, 2015; (3) a Traffic Statement prepared by Walsh Colucci Lubeley Emrich & Walsh, PC, dated August 28, 2015; (4) Email correspondence between Walsh, Colucci, Lubeley, Emrich, & Walsh, PC and DTIC Staff, which confirmed County acceptance of the submitted Traffic Statement, dated September 1, 2015; and (6) a Special Exception Plat prepared by Parsons, dated August 27, 2015.

Compliance with the Countywide Transportation Plan

The subject property lies within the Rural Policy Area. The transportation network is specifically governed by the policies of the *Countywide Transportation Plan (2010 CTP)* and the *Bicycle & Pedestrian Mobility Master Plan (2003 Bike & Ped Plan)*.

DTCI's assessment of the transportation network is based on review of existing, planned and programmed transportation facilities, review of the Applicant's Traffic Statement, and applicable County policies.

Existing, Planned and Programmed Transportation Facilities

The site is located on the east side of White Rock Road, approximately 2.2 miles north of Harpers Ferry Road. Roadways serving the site are described below. Descriptions for planned conditions of CTP roads are taken from Appendix 1 of the 2010 CTP; descriptions of planned bicycle and pedestrian facilities on CTP roads are taken from Appendix 6 of the 2010 CTP and the 2003 Bike & Ped Plan.

White Rock Road is an unpaved, variable-width private driveway located wholly within the subject property that travels in a north-south direction along the western edge of the site. The road is maintained by the property owner and provides access to the public road network via an unsignalized intersection with Harpers Ferry Road. The Applicant does not propose any change in access from the public roadway network or site entrance, which has already been constructed. There is no posted speed limit along White Rock Road as it is a private driveway.

Harpers Ferry Road (VA Route 671) (segment from the Charles Town Pike (VA Route 9) to Jefferson Pike (US Route 340)) is currently a two-lane undivided (R2) major collector roadway that travels in a north-south direction west of the subject property. Harpers Ferry Road is constructed to its ultimate condition per the 2010 CTP. The Applicant does not propose any change in access from the public roadway network or the White Rock Road driveway entrance, which has already been constructed. The posted speed limit in the vicinity of the site is 55 MPH. Per 2014 VDOT estimates, Harpers Ferry Road carries approximately 2,400 vehicles per day in the vicinity of the site.

The 2003 Bike & Ped Plan categorizes this section of Harpers Ferry Road in the Rural Policy Area as a "Baseline Connecting Road" along which bicycle and pedestrian facilities are envisioned. However, Appendix 6 of the 2010 CTP also notes that sidewalks will typically not be provided along rural road sections such as this segment of Harpers Ferry Road. Currently, there are no bicycle and pedestrian facilities constructed on either side of Harpers Ferry Road in the vicinity of White Rock Road.

Review of Applicant's Trip Generation Memorandum

The Applicant submitted a Traffic Statement, which is provided as **Attachment 2**. This describes the existing and proposed telecommunications facilities trip generation and impacts to nearby roadways. Trips to the site are anticipated not to exceed 120 trips per day, with 45 trips during the AM Peak Hour, 45 trips during the PM Peak Hour, and 30 trips during off-peak hours. As such, the Applicant does not anticipate a significant increase in traffic volumes generated by the proposed development.

Transportation Comments and Recommendations

DTCI staff reviewed the Applicant's submitted materials, and has the following comments:

1. DTCI has evaluated the Applicant's Traffic Statement and trip generation rates for the proposed development and finds that the traffic impacts from the expanded facility to be minimal and that improvements to the public roadway network are not necessary with this proposal.
2. The Applicant needs to ensure that the access to White Rock Road from Harpers Ferry Road is constructed to current VDOT commercial entrance standards. DTCI defers to VDOT for review and further comment on these standards.

Conclusion

DTCI has no objection to approval of these applications.

ATTACHMENTS

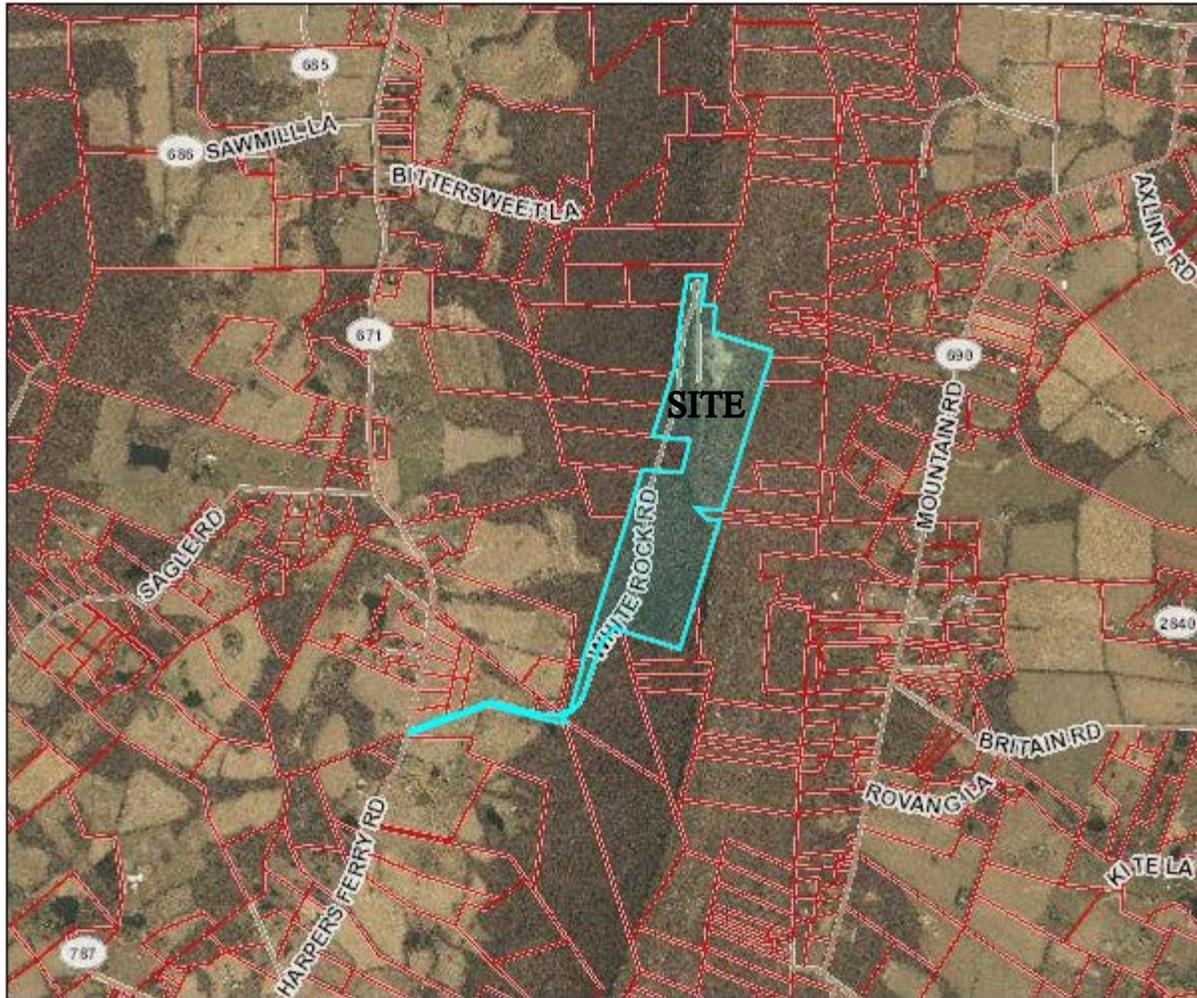
1. Site Vicinity Map
2. Traffic Statement for AT&T Special Exception for Expansion of an Existing Telecommunications Facility

cc: Kathleen Leidich, Assistant Director, DTCI
Lou Mosurak, Senior Coordinator, DTCI



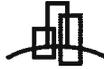
Loudoun County, Virginia
www.loudoun.gov

(map not to scale)



SPEX 2015-0020 – AT&T Removal of Non-Conforming Use
SPEX 2015-0021 – AT&T Telecommunication Expansion

ATTACHMENT 1



**WALSH COLUCCI
LUBELEY EMRICH
& WALSH PC**

Christine Gleckner, AICP
Land Use Planner
(571) 209-5776
cgleckner@ldn.thelandlawyers.com

August 28, 2015

Robert S. Brown
Loudoun County Office of Transportation and Capital Infrastructure
One Harrison Street, S.E.,
Leesburg, VA 20177

Re: Traffic Statement
AT&T, Special Exception for Expansion of an Existing Telecommunications
Facility

Dear Mr. Brown:

I am providing this traffic statement pursuant to the traffic study requirement contained in the minimum submission requirements checklist for a special exception application, and your e-mail dated August 20, 2015, which I have included with this letter. This letter is being provided as a traffic statement in lieu of a traffic study for the expansion of the existing AT&T telecommunications facility located in northwest Loudoun County north of Hillsboro.

AT&T is proposing to expand its existing telecommunications facility located at 12355 White Rock Road with a 161,000 square foot building to house updated and modern equipment. As with other telecommunications facilities and data centers, a minimal number of employees are required to operate and maintain the facility and its equipment. The facility will have 60 employees spread over three daily work shifts. The traffic count for these employees is anticipated as follows:

AM peak hour: 45 trips
PM peak hour: 45 trips
Midnight shift: 30 trips

The property is located on the east side of Harpers Ferry Road (Route 671), north of Charles Town Pike in the Catoctin election district. The AT&T property accesses Route 671, via the private White Rock Road. The existing entrance onto Harpers Ferry Road will continue to be used.

PHONE 703 737 3633 ■ FAX 703 737 3632 ■ WWW.THELANDLAWYERS.COM
1 E. MARKET STREET, THIRD FLOOR ■ LEESBURG, VA 20176-3014

ARLINGTON OFFICE 703 528 4700 ■ PRINCE WILLIAM OFFICE 703 680 4664

**ATTORNEYS AT LAW
ATTACHMENT 2**

Please contact me if you need any additional information.

Sincerely,

WALSH, COLUCCI, LUBELEY, EMRICH & WALSH, P.C.

A handwritten signature in black ink, appearing to read "Christine Gleckner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christine Gleckner, AICP
Land Use Planner

Attachment: E-mail from Bob Brown dated August 20, 2015

Gleckner, Christine E.

From: Brown, Bob <Bob.Brown@loudoun.gov>
Sent: Thursday, August 20, 2015 1:02 PM
To: Gleckner, Christine E.
Cc: Toth, Rory
Subject: RE: AT&T application - traffic study

Chris: A traffic statement would be acceptable for the project described below and with the estimate of trips as shown.
Bob

From: Gleckner, Christine E. [<mailto:cgleckner@thelandlawyers.com>]
Sent: Monday, August 17, 2015 4:57 PM
To: Brown, Bob <Bob.Brown@loudoun.gov>
Subject: AT&T application - traffic study

Bob,

I am preparing a special exception application for the expansion of the existing AT&T facility on Harpers Ferry Road near Neersville, and I am seeking approval to submit a traffic statement in lieu of a traffic study due to the limited trip generation. I would prepare this statement myself rather than a transportation consultant.

I have attached the materials submitted for the pre-application conference to help you familiarize yourself with the proposal. The expanded facility will have 60 employees spread over three shifts resulting in the trip generation below.

Please confirm that a traffic statement is acceptable for this application and that I can prepare the statement for the application.

Thanks, Chris



Christine Gleckner, AICP, Land Use Planner
Walsh Colucci Lubeley & Walsh PC
1 E. Market Street | Suite 300 | Leesburg, VA 20176
Phone: (703) 737-3633 | Ext. 5776 | Fax: (703) 737-3632
Direct: (571) 209-5776
Mobile: (703) 859-4956
www.TheLandLawyers.com

From: Fleming, Mike [<mailto:Mike.Fleming@parsons.com>]
Sent: Monday, August 17, 2015 4:23 PM
To: Gleckner, Christine E.
Cc: Barker, Wayne; Niehaus, Harlan
Subject: SPEX - Traffic Information

Christine,

Here is the planned Traffic count information for the site during full operation:

AM Peak Hour: 45 trips

PM Peak Hour: 45 trips

Midnight Peak hour: 30 trips

Trip: Single vehicle traveling in one direction (not round trip).

Mike Fleming, P.E., LEED AP BD+C

PARSONS

4701 Hedgemore Drive ♦ Charlotte, NC 28209

Phone – 704.558.4282

Mike.Fleming@parsons.com ♦ www.parsons.com

Attorney-Client Privileged Communication: The information in this email and attachments is attorney-client privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please delete it and immediately notify us by email or by phone. Thank you.

County of Loudoun

Department of Transportation and Capital Infrastructure

MEMORANDUM

DATE: March 1, 2016

TO: Steve Barney, Project Manager
Department of Planning and Zoning

FROM: Marc Dreyfuss, Transportation Planner *MD*
DTCI, Transportation Planning & Operations Division

**SUBJECT: CMPT 2016-0001 – AT&T Short Hill
First Referral**

Background

This Commission Permit (CMPT) application seeks to determine whether the location, character, and extent of a proposed telecommunications facility expansion are in substantial conformance with the Comprehensive Plan. The 3.7-acre expansion site, when added to the existing facility, would create a 15.3-acre telecommunications site on a portion of a deeded 176.83-acre (138.61-acres assessed) parcel. The site is located along White Rock Road, a private road located within the subject property that joins the public road network at Harpers Ferry Road (VA Route 671) more than two miles to the south of the existing telecommunications facility. The subject property is zoned AR-1 (Agricultural Reserve – 1) under the Revised 1993 Zoning Ordinance. Access to the site exists via White Rock Road which connects the site to the public roadway network via an unsignalized intersection with Harpers Ferry Road. The Applicant does not propose any changes to the public road network with this application. A vicinity map is provided as ***Attachment 1***.

Department of Transportation and Capital Infrastructure (DTCI) review of this application is based on materials received from the Department of Planning and Zoning on February 10, 2016, including: (1) an Information Sheet, dated February 9, 2016; (2) a Statement of Justification prepared by the Applicant, dated February 5, 2016; (3) A Response Letter to DTCI Comments from SPEX 2015-0036 and SPEX 2015-0037 prepared by Walsh, Colucci, Lubeley, and Walsh, PC, dated February 5, 2016; and (4) a Commission Permit Plat prepared by Parsons, dated January 22, 2016 and revised through January 29, 2016.

Compliance with the Countywide Transportation Plan

The subject property lies within the Rural Policy Area. The transportation network is specifically governed by the policies of the Countywide Transportation Plan (2010 CTP) and the Bicycle & Pedestrian Mobility Master Plan (2003 Bike & Ped Plan).

DTCI's assessment of the transportation network is based on review of existing, planned and programmed transportation facilities, review of the Applicant's Traffic Statement, and applicable County policies.

Existing, Planned and Programmed Transportation Facilities

The site is located on the east side of White Rock Road, approximately 2.2 miles north of Harpers Ferry Road. Roadways serving the site are described below. Descriptions for planned conditions of CTP roads are taken from Appendix 1 of the 2010 CTP; descriptions of planned bicycle and pedestrian facilities on CTP roads are taken from Appendix 6 of the 2010 CTP and the 2003 Bike & Ped Plan.

White Rock Road is an unpaved, variable-width private driveway located wholly within the subject property that travels in a north-south direction along the western edge of the site. The road is maintained by the property owner and provides access to the public road network via an unsignalized intersection with Harpers Ferry Road. The Applicant does not propose any change in access from the public roadway network or site entrance, which has already been constructed. There is no posted speed limit along White Rock Road as it is a private driveway.

Harpers Ferry Road (VA Route 671) (segment from the Charles Town Pike (VA Route 9) to Jefferson Pike (US Route 340)) is currently a two-lane undivided (R2) major collector roadway that travels in a north-south direction west of the subject property. Harpers Ferry Road is constructed to its ultimate condition per the 2010 CTP. The Applicant does not propose any change in access from the public roadway network or the White Rock Road driveway entrance, which has already been constructed. The posted speed limit in the vicinity of the site is 55 MPH. Per 2014 VDOT estimates, Harpers Ferry Road carries approximately 2,400 vehicles per day in the vicinity of the site.

The 2003 Bike & Ped Plan categorizes this section of Harpers Ferry Road in the Rural Policy Area as a "Baseline Connecting Road" along which bicycle and pedestrian facilities are envisioned. However, Appendix 6 of the 2010 CTP also notes that sidewalks will typically not be provided along rural road sections such as this segment of Harpers Ferry Road. Currently, there are no bicycle and pedestrian facilities constructed on either side of Harpers Ferry Road in the vicinity of White Rock Road.

Transportation Comments and Recommendations

DTCI previously provided comment on this proposed expansion as part of a special exception application (SPEX 2015-0037). That special exception application has been superseded by this commission permit application. Staff comments from the first DTIC referral for SPEX 2015-0037 (November 18, 2015), as well as the Applicant's responses (quoted directly from its February 5, 2016 response letter), and comment statuses are included below, along with an additional new comment specific to the commission permit application.

1. **Initial Staff Comment (SPEX 2015-0037, November 18, 2015)**: DTIC has evaluated the Applicant's Traffic Statement and trip generation rates for the proposed development and finds that the traffic impacts from the expanded facility to be minimal and that improvements to the public roadway network are not necessary with this proposal.

Applicant's Response (February 5, 2016): The Applicant concurs with the DTCl analysis.

Comment Status: DTCl notes that no traffic study is required for a Commission Permit application. It is noted that the proposed use, as a telecommunications facility, will add minimal trips to the public roadway network. Comment addressed.

2. Initial Staff Comment (SPEX 2015-0037, November 18, 2015): The Applicant needs to ensure that the access to White Rock Road from Harpers Ferry Road is constructed to current VDOT commercial entrance standards. DTCl defers to VDOT for review and further comment on these standards.

Applicant's Response (February 5, 2016): The Applicant has contacted VDOT, which is in the process of reviewing White Rock Road for conformance to current standards. Modifications will be made if necessary based on their evaluation.

Comment Status: DTCl again defers to VDOT for review and further comment.

New Comment

3. DTCl notes that the proposed telecommunications facility expansion does not conflict with any existing or planned roadways shown on the 2010 CTP.

Conclusion

As proposed with this submission, DTCl could support approval of this application.

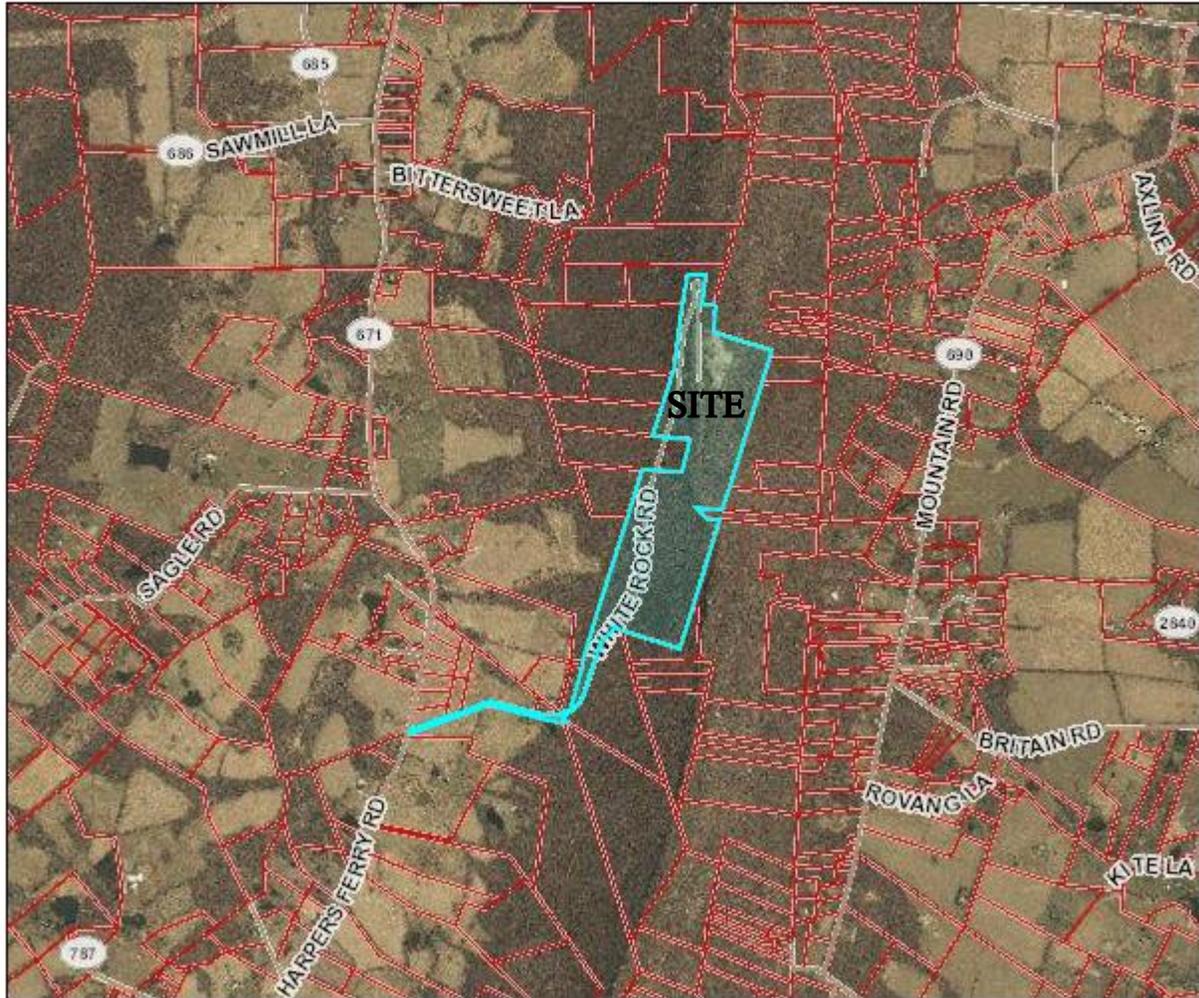
ATTACHMENT

1. Site Vicinity Map

cc: Kathleen Leidich, Assistant Director, DTCl
Lou Mosurak, Senior Coordinator, DTCl



(map not to scale)



CMPT 2016-0001 – AT&T Short Hill

ATTACHMENT 1

COUNTY OF LOUDOUN
DEPARTMENT OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: January 28, 2016

TO: Steve Barney, Zoning Planner

FROM: John Zuiker, County Urban Forester

93

SUBJECT: AT&T TELECOMMUNICATIONS FACILITY

On January 21, 2016, I conducted a site visit to the proposed AT&T Telecommunications Facility located off of White Rock Road, Purcellville, Virginia. I am providing my findings and suggestions concerning landscaping and invasive plant control.

Western slope

There is a portion of this slope that has been disturbed in the past that is dominated by the invasive tree, *Ailantus altissima*, tree of heaven, from the existing parking lot going down the slope. Many of these trees seem to be dead or in decline. However, sparsely interspersed among the tree of heaven are black locust, cherry, maple and Virginia pine trees. Although these native trees are not thriving they are surviving, which may be an indication that it is not a soil problem that is killing the tree of heaven plants.

The disturbed area consists of rock boulders with some soil in the crevices. Most of the native vegetation, outside of the disturbed areas, appears to be healthy and growing normally.

1. Several soil tests should be taken within the disturbed area to determine adjustments that might need to be made to the soil to make it suitable for healthy plant growth.
2. An invasive plant mitigation plan should be devised to slowly eliminate invasive plants, particularly tree of heaven, on the western slope. Eliminating all of the invasive trees at once could create an erosion problem so a long term strategy, possibly 5 years or more is recommended. This plan should address whether to remove or just kill the trees, the planting of native trees and/or seedlings with deer protection, periodic inspection, techniques to be used for eradication and control and the timing sequence for implementation of all portions of the plan. Define the control area and address protection of the native plants in the control area.
3. Any new tree plantings should be native trees similar the species that are growing in that area. Examples are maples, cherry, Virginia pine, tulip poplar, hickory and oak. Other native trees should also be considered to provide as much diversity as possible.
4. Although not normally recommended, soil amendments or planting beds should be considered as an option to allow new plantings to become established in this area.

South of proposed development

This area consists of mature maples, aspen, tulip poplar, white pine and Virginia pine. Vegetation appears to be healthy and normal.

1. Any new tree plantings should be native trees similar to the species listed above.
2. Invasive plants do not appear to be a problem in this area.

Eastern slope

The eastern slope also has a large pocket of invasive tree of heaven plants. Sparsely interspersed among these trees are oak, hickory, tulip poplar and spruce trees. The undisturbed areas on the eastern slope consists of native trees in good health with normal growth.

1. Several soil tests should be taken within the disturbed area to determine adjustments that might need to be made to the soil to make it suitable for healthy plant growth.
2. An invasive plant mitigation plan should be devised to slowly eliminate invasive plants, particularly tree of heaven, on the eastern slope. Eliminating all of the invasive trees at once could create an erosion problem so a long term strategy, possibly 5 years or more, is recommended. This plan should address whether to remove or just kill the trees, the planting of native trees and/or seedlings with deer protection, periodic inspection, techniques to be used for eradication and control and the timing sequence for implementation of all portions of the plan. Define the control area and address protection of the native plants in the control area.
3. The top of this slope consists of small rock and gravel within the soil layer. Any tree plantings proposed on this ridge top would require amending the soil to create suitable material for planting beds.
4. Although not normally recommended, soil amendments or planting beds should be considered as an option to allow new plantings to become established on this slope.

JHZ/

COUNTY OF LOUDOUN
DEPARTMENT OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: March 1, 2016
TO: Steve Barney, Project Manager, Department of Planning & Zoning
FROM: John Zuiker, County Urban Forester
SUBJECT: AT&T Short Hill, CMPT 2016-0001

The following urban forestry comments were generated from my review of the plan provided to me on February 9, 2016.

Sheet 7 of 12

1. The legend and sheet shows “proposed plant” areas however this symbol is used on other sheets to depict sensitive slopes. Clarify what this legend identification represents.
2. There appears to be symbols for tree and shrub plantings in the upper left corner of this sheet but there is nothing identifying what they represent. Clarify what these symbols represent and provide a note committing to the installation of these plantings.
3. There are references to areas to be “replanted, proposed plantings, infill plantings and reforestation” but no description of how this is to be accomplished is provided. Clarify what is meant by each planting area and how they will be implemented; sizes, types, density, etc.
4. Soil tests are shown for the reforestation infill areas only however the area where evergreen trees will be planted, near the parking lot, should also be tested to ensure the plant survival. Recommend including this area for soil testing.
5. There is a commitment to an invasive plant mitigation plan however the only area identified on the plan for implementation of this plan is the one area near the existing parking lot. Clarify and provide commitment as to the areas that will be covered under the invasive plant mitigation plan.

JHZ/

COUNTY OF LOUDOUN
DEPARTMENT OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: March 11, 2016

TO: Steve Barney, Project Manager, Department of Planning & Zoning

FROM: John Zuiker, County Urban Forester

SUBJECT: AT&T Short Hill, CMPT 2016-0001

I have reviewed the recent plan submitted, with revised comments dated March 7, 2016, for AT&T Short Hill. All urban forestry comments have been satisfactorily addressed. There are no urban forestry review comments for this plan submission.

JHZ/

COUNTY OF LOUDOUN
DEPT. OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: December 4, 2015

TO: Pat Giglio, Project Manager

FROM: Ryan Reed, Natural Resources Team Leader / County Soil Scientist

SUBJECT: AT&T Telecommunication Expansion (SPEX-2015-0036 & SPEX-2015-0037)

The County is in receipt of the Special Exception application for the above stated project. The review is based on the standards set forth in Sections 4-1600, 5-1508, and 6-1300 of the Loudoun County Zoning Ordinance (ZO), and the Facility Standards Manual (FSM). Per review the County has the following comments:

- 1) Show all existing conditions including the existing road from south of the parking area that changes direction and heads northeast towards the proposed building area.
- 2) Illustrate existing drainfield area, sewer lines and associated tree conservation area pursuant to SPEX-2004-0029.
- 3) Per discussion in the field on 11/13/2015, due to unknown depth or characterization of the fill material throughout the proposed construction site, staff, as a courtesy suggested the applicant ensure, when retaining a consultant to provide the required geotechnical investigation and report, the following items be addressed: a) areas of fill exceeding 25% slopes be addressed specifically when subject to any stormwater discharge, overland or concentrated flow, or increased velocities and b) if and where infiltration is proposed, global stability analysis of saturated conditions within the zone of influence be evaluated. (ZO 6-1310(G),(N) & FSM 6.150.A.2, 6.152.J.1)
- 4) Coordinate with the County Urban Forester to address appropriate plantings that will supplement and succeed the existing vegetative coverage in the existing perimeters of the project for providing landscaping, screening and buffering as well as slope stabilization. (ZO 6-1310(F)&(G))

COUNTY OF LOUDOUN
DEPT. OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: March 2, 2016
TO: Steve Barney, Project Manager
FROM: Ryan Reed, Natural Resources Team Leader / County Soil Scientist
SUBJECT: CMPT-2016-0001 – AT&T Short Hill; 2nd Referral

The County is in receipt of the Commission Permit application for the above stated project. The review is based on the standards set forth in Sections 4-1600 and 5-1508 of the Loudoun County Zoning Ordinance (ZO), and the Facility Standards Manual (FSM). Per review the County has the following comments:

- 1) Illustrate the existing tree conservation area pursuant to SPEX-2004-0029.
- 2) Sheet CMPT-4. Correct the Mountainside Development Overlay District (MDOD) designation to reflect that the area of soil mapping unit 50C is “Sensitive MDOD” instead of partially “Highly Sensitive MDOD.” (Preliminary Soils Report 10/10/2006).
- 3) Sheet CMPT-4. Clarify the proposed ultimate limits of clearing and grading, including if necessary the “expansion drainfield.” 4-1606.A.3. Additionally, identify the line with the triangles that encroaches into soil mapping unit 50D.
- 4) **Recommendation:** Sheet CMPT-1. Revise Storm Water Management note #1 to indicate that infiltration may be proposed provided the suitability is field verified by the County Soil Scientist prior to final design.
- 5) **Recommendation:** Sheet CMPT-1. Storm Water Management note #1 consider other innovative stormwater best management practices including, but not limited to vegetated roofs on portions of the project, rooftop disconnection, rainwater harvesting / reuse, etc.

COUNTY OF LOUDOUN
DEPT. OF BUILDING AND DEVELOPMENT
MEMORANDUM

DATE: March 21, 2016
TO: Steve Barney, Project Manager
FROM: Ryan Reed, Natural Resources Team Leader / County Soil Scientist
SUBJECT: CMPT-2016-0001 – AT&T Short Hill; 3rd Referral

The County is in receipt of the Commission Permit application for the above stated project. The review is based on the standards set forth in Sections 4-1600 and 5-1508 of the Loudoun County Zoning Ordinance (ZO), and the Facility Standards Manual (FSM). Per review the County has the following comments:

- 1) Limits of clearing and grading, addressing comment #3 from the Natural Resources Team March 2, 2016 comments, illustrates proposed land disturbing activity within soils mapping unit 50D. Only those limited areas of soil mapping unit 50D that were cleared previously for the existing fence are “sensitive” Mountainside Development Overlay District (MDOD) areas, and the remainder is “highly sensitive.” Adjust limits of clearing and grading to avoid “highly sensitive” MDOD or a Special Exception will be required.

However, the illustration of the soils map and MDOD delineations appears to be skewed. When ensuring that no land disturbing activity is within the wooded areas of soil mapping unit 50D, staff recommends that the projection of the individual layers are correct.



LOUDOUN COUNTY, VIRGINIA
Department of Fire, Rescue and Emergency Management

801 Sycolin Road, Suite 200 Leesburg, VA 20175
Phone 703-777-0333 Fax 703-771-5359



Memorandum

To: Kate McConnell, Project Manager
From: Maria Figueroa Taylor, Fire-Rescue Planner
Date: November 17, 2015
Subject: SPEX 2015-0036 AT&T Removal of non-conforming use
SPEX 2015-0037 AT&T Telecommunication expansion

Thank you for the opportunity to review the above captioned applications. The Fire and Rescue Planning Staff has no comments.

The Fire-Rescue GIS and Mapping coordinator offered the following information regarding estimated response times:

PIN	Loudoun Heights, Station 26 Travel Time
477-38-7669	4 minutes

Travel times are determined using ESRI GIS network analyst along the county's street centerline with distance and speed limit being the criteria. Travel time is reported in minutes and seconds. For the approximate response time two minutes is added for turnout time.

Approximate Response Time for Loudoun Heights, Station 26
6 minutes

If you have any questions or need additional information, please contact me at 703-777-0333.

c: Project file



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

November 30, 2015

Kate McConnell, AICP
County of Loudoun
Department of Building and Development
1 Harrison Street, S.E.
P.O. Box 7000 – MSC #60A
Leesburg, Virginia 20177-7000

Re: AT&T Removal of Non-Conforming Use and Telecommunication Expansion
Loudoun County Application Number: SPEX 2015-0036 and SPEX 2015-0037

Dear Ms. McConnell:

We have reviewed the above application as requested in your October 19, 2015 transmittal (received October 20, 2015).

We have no objection to approval of this application.

If you have any questions, please call me at (703) 259-3259 to discuss.

Sincerely,

Clyde A. Wallace

Clyde A. Wallace, P.E.
Engineer

cc: Antonios R. Estafanous, P.E.

November 18, 2015

MEMORANDUM TO: Kate McConnell, AICP, Project Manager MSC # 60A

FROM: Joshua Hepner MSC #68
Environmental Health Specialist, Sr.
Division of Environmental Health

SUBJECT: **SPEX-2015-0036 – AT&T Removal of Non-Conforming Use**
SPEX-2015-0037 – AT&T Telecommunication Expansion

PIN: **477-38-7669**

This Department reviewed the plat prepared by Parsons Environmental & Infrastructure Group, Inc., dated 8/27/2015, and recommends approval of the proposal with the following comments:

For all future referrals regarding this project, the wells and sewage disposal systems are to have their appropriate GIS mapping identification number added. Prior to receiving recommendation for a building permit, any applicable documentation/engineering regarding the increased load on the existing sewage disposal system, and any associated sewage disposal system expansion, construction or repair applications for permits must be submitted to the Loudoun County Health Department for review and approval.

If further information or clarification on the above project is required, please contact Joshua Hepner at 703-771-5814.



Loudoun County Health Department



Environmental Health
Phone: 703 / 777-0234
Fax: 703/771-5023

P.O. Box 7000
Leesburg VA 20177-7000

Community Health
Phone: 703/777-0236
Fax: 703/ 771-5393

RECEIVED
MAR 08 2015
BUILDING & DEVELOPMENT

RECEIVED
MAR 08 2016
LOUDOUN COUNTY
DEPARTMENT OF PLANNING & ZONING

March 1, 2016

MEMORANDUM TO: Steve Barney, Project Manager

MSC # 60A

FROM: Joshua Hepner *JH*
Environmental Health Specialist, Sr.
Division of Environmental Health

MSC #68

SUBJECT: CMPT-2016-0001 AT&T Short Hill

PIN: 477-38-7669

This Department reviewed the plat prepared by Parsons Environmental & Infrastructure Group, Inc., dated 1/29/2016, and staff supports the approval of the application with the following reservations:

Prior to receiving recommendation for a building permit, any applicable documentation/engineering regarding the increased load on the existing sewage disposal system, and any associated sewage disposal system expansion, construction or repair applications for permits must be submitted to the Loudoun County Health Department for review and approval. The current system is permitted and designed for 5 employees, working 1 eight hour shift for 5 days per week. The proposed increase in waste load of 60 employees per day, working 3 eight hour shifts for 7 days per week will require modification of the existing design.

If further information or clarification on the above project is required, please contact Joshua Hepner at 703-771-5814.

✓

STATEMENT OF JUSTIFICATION

CMPT-2016-0001, AT&T

Commission Permit for the Expansion of Existing Telephone Transmission Utility Substation

Loudoun County PIN #477-38-7669

February 5, 2016
Revised March 29, 2016

I. Introduction

Parsons Environment and Infrastructure Group, Inc. is requesting approval of a commission permit in accordance with Zoning Ordinance Section 6-1101 (A) of the Revised 1993 Loudoun County Zoning Ordinance on Loudoun County PIN #477-38-7669 for the expansion of an existing telephone transmission utility substation owned and operated by AT&T. The metes and bounds description in the deed for the property indicates that the property contains 176.38 acres. AT&T also owns three additional contiguous parcels for a total landholding of approximately 230 acres.

The property is zoned AR-1, Agricultural Rural-1 under Section 2-100 of the Zoning Ordinance and MDOD, Mountainside Development Overlay District under Section 4-1600 of the Zoning Ordinance. The property is located north of the Charles Town Pike (Route 9) on the east side of Harpers Ferry Road (Route 671) at 12355 White Rock Road, Purcellville, Virginia. The property is located within the Rural Policy Area under the Revised General Plan. The property is surrounded by similarly-zoned residential and vacant properties.

The Subject Property presently houses a “central office” switching facility, which in the telecommunications industry, refers to the facility containing the switching equipment. The original facility, which was constructed in the early 1960’s, consisted of microwave relay dishes and a building with the associated “central office” switching equipment providing telephone transmission services. The facility received commission permit approval in 1962, which was the only approval required under the 1959 Zoning Ordinance in effect at the time. In the last decade, various revisions and upgrades to the equipment have occurred, including the removal of the microwave dishes.

To support the ongoing functionality of the central office in the digital age, AT&T is planning to install modern telephone transmission and processing equipment to support the continued operation of the central office, which will continue to be connected to the telephone transmission grid. In support of this modernization, a new equipment building approximately 160,000 square feet in size will be constructed on the property. This building will primarily enclose mechanical and electrical equipment with a small area for the operation and maintenance staff along with such ancillary features as spare parts rooms, bathrooms, and a receiving area

with loading dock for receiving equipment and supplies to support facility operation and maintenance. In addition, the interior of the existing building will be updated to house modern telephone transmission and processing equipment and the staff to operate it. Emergency standby generators will be located on the property that will use diesel fuel. Sixty employees will work at the facility covering three shifts each day, seven days a week.

II. Commission Permit

Pursuant to Zoning Ordinance Section 6-1101, “*No...public utility facility..., whether publicly or privately owned, shall be constructed, established or authorized, unless and until the general location or approximate location, character and extent thereof has been submitted and approved by the Planning Commission as being substantially in accord with the adopted Comprehensive Plan.*” Furthermore, Zoning Ordinance Section 6-1103 (A) states that “[T]he Planning Commission shall review the application to determine if the feature for which approval is sought is substantially in accord with the adopted Comprehensive Plan.”

The following outlines how the proposed expansion of the existing telephone utility substation is “*substantially in accord with the adopted Comprehensive Plan.*”

- A. Land Use: The property is located in the Rural Policy Area which supports the expansion of existing non-agriculturally related commercial uses, if the use and proposed expansion is compatible with neighboring uses and poses no threat to public health or safety.

Compatibility: The Strategic Land Use Plan for Telecommunication Facilities supports such facilities in the rural area provided the facility is able “...to blend with the natural and built environment of the surrounding area.” The visual impact of the facility design should be assessed for “...the setting, color, lighting, topography, materials and architecture.” The policies also recommend that “...these structures should blend in with the surrounding environment through the use of appropriate color, texture of materials, topography, scale of buildings, landscaping and visual screening.” (Policies II.B.1, 2 and 3) The AT&T facility will locate in an area on the ridge that has already been cleared and graded, which will result in minimal impact to the environment with its location using only 15 acres of a 230-acre parcel of land and is situated among existing mature trees. Additional landscaping and screening will be provided to fill in gaps where existing vegetation will not screen the building. The building and siting is designed to minimize its impact on the scenic features. The building itself is designed to blend in with its surroundings, using a mixture of brown and green shades to blend in with the surrounding landscape as shown on the accompanying plans, and lighting only necessary for safety and security. The facility will be minimally visible from both Harpers Ferry Road and Mountain Road and will be screened with existing vegetation as well as newly planted trees and landscaping. The accompanying plans contain images portraying the minimal visual impact the facility will have on the landscape and its minimal visibility from the public roads.

The proposed expansion of the existing facility will not generate any additional noise that would have a negative impact the uses in the immediate area. The facility does require the use of back-up generators for power generation, but their location in the center of the 230-acre landholding means that the noise level at the property line will be minimal if at all detectable. No glare or other emissions will result from the proposed facility.

The landholding is surrounded by vacant land and rural residential properties. The nearest residential structures to the proposed facility are all approximately a half mile away.

Green Infrastructure: The existing facility is located near the top of the ridge in an area that previously was cleared and graded to support the telephone transmission utility substation and its equipment. The expansion is proposed to locate in the vicinity of the existing facilities in a relatively level area near the crest of the mountain, and therefore, should not entail substantial additional clearing and grading. The existing road access, driveway and parking areas will be used for the expanded facility. The developed area of the 176-acre parcel consists of only 15.3 acres or less than ten percent of the parcel land area. The remainder of the property will remain wooded in its natural state.

The property is located on the west side of Short Hill Mountain with portions zoned Mountainside Development Overlay District (MDOD) and portions containing steep slopes. The facility is designed to mitigate these environmentally sensitive areas through its design and adherence to the performance criteria.

The stormwater management plan for the property will include low impact development (LID) practices using a combination of infiltration, bioretention and reclamation.

The expansion area is located in the already disturbed 15-acre portion of the property, and therefore will not affect wildlife habitat or wetlands. Air quality will not be affected and water quality will be addressed through the stormwater management requirements.

- B. Transportation Impacts: With a maximum of 60 employees distributed over three shifts daily, seven days a week, the traffic impacts will be minimal. The existing White Rock Road will continue to provide access to the property. The traffic generated from the facility is minimal, and the public roads serving the property are sufficient for the traffic at this site. Given its location, pedestrian access is not appropriate.

V. Conclusion

The proposed expansion of the existing AT&T telephone transmission utility substation will provide updated and expanded facilities that will allow the applicant to continue to serve the telephone communications needs of Loudoun County and the region in addition to the government. The proposed expansion will allow the facility to be upgraded to current technology, thereby improving the services provided to AT&T customers. The proposed expansion is substantially in accord with the Revised General Plan and will allow the applicant to provide the space needed to update the facility with up-to-date technology. Since the expansion will occur within the already disturbed areas of the property, the proposal's impact on the undeveloped areas of the property and on neighboring properties will be minimal. The commission permit will allow the expansion of an existing telephone transmission utility substation in the rural area that will continue operating in a manner compatible with the surrounding area, given its location within a large wooded parcel and minimal visibility from outside of the site



WALSH COLUCCI
LUBELEY & WALSH PC

Christine Gleckner, AICP
Land Use Planner
(571) 209-5776
cgleckner@thelandlawyers.com

February 5, 2016

Via Hand Delivery

Steven Barney, Planner
Loudoun County Department of Planning and Zoning

**Re: Formerly SPEX 2015-0036 & SPEX 2015-0037, Telecommunication
Expansion; Revised as CMPT-2016-0001, Expansion of Existing Telephone
Transmission Utility Substation - Responses to Referral Comments**

Dear Mr. Barney:

This letter addresses and provides you with a written response to the referral agency comments in the above referenced application. For your convenience, each of the staff comments are stated below and the Applicant's responses follow in bold italics.

**LOUDOUN COUNTY DEPARTMENT OF PLANNING & ZONING – COMMUNITY
PLANNING (PAT GIGLIO, 11/25/2015)**

LAND USE

The County's land use policies support the expansion of existing non-agriculturally related commercial uses, such as the proposed communications facility, in the Rural Policy Area by Special Exception subject to performance standards. Further evaluation of the overall compatibility of the proposed use and potential environmental impacts are needed to evaluate the application's conformance with the policies of the Revised General Plan.

Applicant Response:

In response to the referral comments on the proposed special exception applications and in consultation with staff, the applicant is revising the application with this submission as a request for commission permit approval for the expansion of an existing telephone transmission utility substation.

ATTORNEYS AT LAW

703 737 3633 ■ WWW.THELANDLAWYERS.COM
1 E. MARKET STREET ■ SUITE 300 ■ LEESBURG, VA 20176-3014

ARLINGTON 703 528 4700 ■ WOODBRIDGE 703 680 4664

COMPATIBILITY

The proposed expansion of the existing AT&T facility will not change the existing use or function of the facility, however the proposed construction of the one-story communications building on the ridgeline of the Short Hill Mountain will have a visual impact on the surrounding area.

Staff recommends that the roof height of the proposed communications building be the lowest possible or the building be imbedded into slope to minimize the silhouette of the building on the ridgeline and that the building be painted in a non-reflective matte dark brown or black/green color to blend with surrounding forest cover.

Staff recommends that the area in and around the proposed communications facility on the made slopes that comprise the subject site be reforested with supplemental planting of native species to provide additional screening to soften views of the proposed building from views in the valleys. Staff recommends that these existing forested areas on the made slopes also be designated as tree conservation areas (TCAs) and that conditions be developed to ensure the protection and long term maintenance of these trees as a permanent landscape buffer.

Applicant Response:

The building height has been set to the lowest achievable height based on the equipment requirements and site constraints. To soften the view of the building, the color and pattern of the exterior will be selected to blend in to the surrounding existing and proposed landscaping.

The landscaping plan will include areas that will be labeled “Forest Management Areas”. These areas will address the long term control of invasive species as well as screening. The screening plantings will utilize native evergreen and hardwood species that will, over time grow to provide cover for the building.

MOUNTAINSIDE AREAS

The subject site is located on the ridgeline of Short Hill Mountain in an area designated by the County as the Mountainside Development Overlay District (MDOD). Staff defers to the Department of Building and Development for further review of the proposed construction plans within the MDOD for conformance with the County environmental policies and requirements.

Applicant Response: Building and Development comments are addressed below.

STORMWATER MANAGEMENT

The application does not provide any information on the proposed stormwater management facilities for the subject site. Staff recommends the applicant commit to integrating low impact development (LID) practices, such as water quality swales, bioretention facilities/rain gardens, sheet flow to vegetative buffers, or any alternative LID practice acceptable to the Department of

Building and Development to minimize the volume of surface water run-off on the subject site. Staff recommends the Applicant coordinate with the Department of Building and Development to determine what types of Stormwater Management/Best Management Practices (SWM/BMPs) may be required on the subject site and what types of LID techniques may be appropriate.

Applicant Response:

The storm water management plan for this site will include low impact development practices. Since there is limited capacity for storm water discharge from this site, a majority of the storm water will be handled through a combination of infiltration, bioretention, and reclamation. Stormwater Management and Best Management Practice selection will be coordinated with the Department of Building and Development during the site plan application review.

RECOMMENDATIONS

Community Planning staff is unable to recommend approval of the Special Exception application at this time and requests additional information and commitments pertaining to building design, mitigation of visual impacts, landscape buffering, reforestation and tree conservation, mountainside protection, and stormwater management to fully evaluate and demonstrate the applications conformance with policies of the Revised General Plan.

Applicant Response:

With this submission of the revised application, the applicant has made commitments to mitigate the visual impacts of the building through a color-scheme for the building that blends with the surrounding landscape, landscaping, reforestation, mountainside protect and stormwater management. These commitments are demonstrated on the commission permit plan.

LOUDOUN COUNTY DEPARTMENT OF PLANNING AND ZONING – ZONING ADMINISTRATION (BRIAN FISH, 12/11/2015)

I. CRITICAL ISSUE – STATUS OF EXISTING USE:

The Zoning Ordinance defines Telecommunications Use and/or Structure as “a use provided by or a structure utilized by a public service utility or commercial public telecommunications service under the jurisdiction of the Virginia State Corporation Commission and/or licensed by the Federal Communications Commission to provide commercial public telecommunications services. A telecommunications structure may include a tower, monopole, antenna hub site, and other antenna support structure or equipment buildings.

Telecommunications use and/or structure does not include non-commercial applications, such as amateur radio operations. Telecommunications use and/or structure does not include those uses or structures that are accessory to and solely used by an individual business.” There does not appear to be any monopole or antenna remaining on the

subject property. If the telecommunications use has been discontinued for a period of two years or more, the special exception approval is no longer valid and the use may not be re-established without the approval of a new special exception. The Applicant should provide additional information regarding the status of the existing use and explain more clearly how it meets the definition of Telecommunications Use and/or Structure.

The Zoning Ordinance defines Data Center as “a facility used primarily for the storage, management, processing, and transmission of digital data, which houses computer and/or network equipment, systems, servers, appliances and other associated components related to digital data operations. Such facility may also include air handlers, power generators, water cooling and storage facilities, utility substations, and other associated utility infrastructure to support sustained operations at a data center.” The facilities proposed with this application appear to be a Data Center rather than a Telecommunications Use and/or Structure. A Data Center is not a permitted use in the AR-1 zoning district. The Applicant should provide additional information regarding the proposed facility and explain how it is a Telecommunications Use rather than a Data Center.

Applicant Response:

As a result of the discussions with staff regarding the existing use, the application is now for a telephone transmission utility substation, which is a permitted use in the AR-1 zoning district. The utility use does require commission permit approval, however.

II. STEEP SLOPE STANDARDS - SECTION 5-1508

The subject property contains large areas of steep slopes that are subject to the Steep Slope Standards contained in Section 5-1508 of the Zoning Ordinance. All land development applications and land disturbing activities on any parcel of land which includes within its boundaries very steep slope areas must comply with the Facilities Standards Manual and the standards contained in Section 5-1508(E) of the Zoning Ordinance.

Applicant Response:

This project will comply with the Facilities Standards Manual and the standards contained in Section 5-1508 (E) of the Zoning Ordinance.

III. MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT

The subject property contains large areas of highly sensitive and sensitive mountainsides that are within the Mountainside Development Overlay District and are subject to the development standards contained in Section 4-1600 of the Zoning Ordinance.

Applicant Response:

This project will protect steep slopes and natural resources in accordance with the standards contained in Section 4-1600 of the Zoning Ordinance.

IV. BUFFERING AND SCREENING

Buffering and Screening are required pursuant to Section 5-1400 of the Zoning Ordinance. Type 4 Buffer Yards are required on all side of the proposed use. The Applicant states that the facility will be screened with existing vegetation as well as supplemental plantings. While there is sufficient existing vegetation on the site to fulfill the Buffer Yard requirements, staff is concerned that the location of the proposed facility on top of the ridge will make effective screening of the structure challenging. The Applicant should provide additional information regarding landscaping plans and supplemental plantings to demonstrate how they will provide effective screening of the proposed facility.

Applicant Response:

The revised submission includes the proposed plans for screening the building with existing and proposed landscaping.

V. SPECIAL EXCEPTION ISSUES FOR CONSIDERATION

Section 6-1309.

- (1) *Whether the proposed minor special exception / special exception is consistent with the Comprehensive Plan.*** Zoning defers to Community Planning in the Department of Planning regarding this issue.
- (2) *Whether the level and impact of any noise, light, glare, odor or other emissions generated by the proposed use will negatively impact surrounding uses.*** All use of the proposed facilities will be subject to the Noise Standards contained in Section 5-1507 of the Ordinance. All lighting on the property will be subject to the Light and Glare Standards contained in Section 5-1504 of the Ordinance.
- (3) *Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and on adjacent parcels.*** Properties adjacent to the subject property are agricultural and residential with single-family detached dwellings.
- (4) *Whether the proposed special exception adequately protects and mitigates impacts on the environmental or natural features including, but not limited to, wildlife habitat, vegetation, wetlands, water quality including groundwater), air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands.*** The Statement of Justification submitted by the Applicant states that there are no archeological, historic, or agricultural features on the site. The Applicant states that the

site of the proposed facilities is an already disturbed portion of the property and that the facility is designed to mitigate environmental issues.

- (5) *Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.*
- (6) *Whether the proposed special exception can be served adequately by public utilities and services, roads, pedestrian connections and other transportation services and, in rural areas, by adequate on-site utilities.* The Statement of Justification submitted by the Applicant states that the property is served by on-site water and wastewater utilities, and generates minimal traffic.

Applicant Response: The statement of justification included with the initial submission of the application addressed how the application met these criteria. However, the application has been revised to request commission permit approval rather than special exception approval, and the revised statement of justification now addresses the criteria for commission permit approval.

LOUDOUN COUNTY DEPARTMENT OF TRANSPORTATION AND CAPITAL INFRASTRUCTURE (MARC DREYFUSS, 11/18/2015)

Transportation Comments and Recommendations

1. *DTCI has evaluated the Applicant's Traffic Statement and trip generation rates for the proposed development and finds that the traffic impacts from the expanded facility to be minimal and that improvements to the public roadway network are not necessary with this proposal.*

Applicant Response: The applicant concurs with the DTCI analysis.

2. *The Applicant needs to ensure that the access to White Rock Road from Harpers Ferry Road is constructed to current VDOT commercial entrance standards. DTCI defers to VDOT for review and further comment on these standards.*

Applicant Response:

The applicant has contacted VDOT, which is in the process of reviewing White Rock Road for conformance to current standards. Modifications will be made if necessary based on their evaluation.

Conclusion

DTCI has no objection to approval of these applications.

**LOUDOUN COUNTY HEALTH DEPARTMENT – ENVIRONMENTAL HEALTH
(JOSHUA HEPNER, 11/18/2015)**

For all future referrals regarding this project, the wells and sewage disposal systems are to have their appropriate GIS mapping identification number added. Prior to receiving recommendation for a building permit, any applicable documentation/engineering regarding the increased load on the existing sewage disposal system, and any associated sewage disposal system expansion, construction or repair applications for permits must be submitted to the Loudoun County Health Department for review and approval.

Applicant Response:

The GIS mapping identification numbers have been added to the plans. The sewage system modifications will be coordinated with and reviewed by Loudoun County Health Department for approval.

**LOUDOUN COUNTY DEPARTMENT OF BUILDING AND DEVELOPMENT –
NATURAL RESOURCES (RYAN REED, 12/4/2015)**

- 1) Show all existing conditions including the existing road from south of the parking area that changes direction and heads northeast towards the proposed building area.*

Applicant Response:

The gravel access road has been clarified on the plans and is labelled on Sheet CMPT-2.

- 2) Illustrate existing drainfield area, sewer lines and associated tree conservation area pursuant to SPEX-2004-0029.*

Applicant Response:

The drainfield is labelled as “effluent disposal area site 101” on Sheet CMPT-2

- 3) Per discussion in the field on 11/13/2015, due to unknown depth or characterization of the fill material throughout the proposed construction site, staff, as a courtesy suggested the applicant ensure, when retaining a consultant to provide the required geotechnical investigation and report, the following items be addressed: a) areas of fill exceeding 25% slopes be addressed specifically when subject to any stormwater discharge, overland or concentrated flow, or increased velocities and b) if and where infiltration is proposed, global stability analysis of saturated conditions within the zone of influence be evaluated. (ZO 6-1310(G),(N) & FSM 6.150.A.2, 6.152.J.1)*

Applicant Response:

These items will be addressed in the geotechnical report submitted at the time of site plan application.

- 4) *Coordinate with the County Urban Forester to address appropriate plantings that will supplement and succeed the existing vegetative coverage in the existing perimeters of the project for providing landscaping, screening and buffering as well as slope stabilization. (ZO 6-1310(F)&(G))*

Applicant Response:

The landscape plan will address plantings and is being developed in coordination with the County Urban Forester.

LOUDOUN COUNTY DEPARTMENT OF FIRE, RESCUE AND EMERGENCY MANAGEMENT (MARIA TAYLOR, 11/17/2015)

The Fire and Rescue Planning Staff has no comments.

The Fire-Rescue GIS and Mapping coordinator offered the following information regarding estimated response times:

<i>PIN</i>	<i>Loudoun Heights, Station 26 Travel Time</i>
<i>477-38-7669</i>	<i>4 minutes</i>

Travel times are determined using ESRI GIS network analyst along the county's street centerline with distance and speed limit being the criteria. Travel time is reported in minutes and seconds. For the approximate response time two minutes is added for turnout time.

<i>Approximate Response Time for Loudoun Heights, Station 26</i>
<i>6 minutes</i>

Applicant Response: The applicant acknowledges these comments.

VIRGINIA DEPARTMENT OF TRANSPORTATION (CLYDE WALLACE, 11/30/2015)

We have no objection to approval of this application.

Applicant Response: The applicant acknowledges the VDOT comments.

With this submission of these applications in response to staff comments, the applicant believes these applications can be scheduled for a planning commission public hearing after staff review of this submission. Please contact me if you have any questions or need additional information.

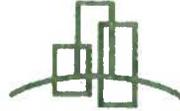
Sincerely,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.

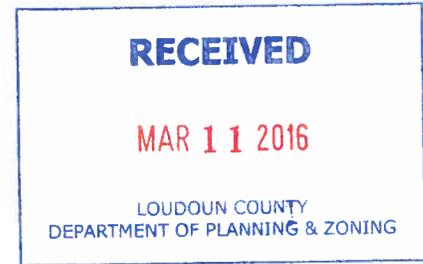


Christine Gleckner, AICP
Land Use Planner

Cc: Robert Erickson, AT&T
John Magyar, Parsons
Mike Fleming, Parsons



**WALSH COLUCCI
LUBELEY & WALSH PC**



Christine Gleckner, AICP
Land Use Planner
(571) 209-5776
cgleckner@thelandlawyers.com

March 10, 2016

Via Hand Delivery

Steve Barney, Project Planner
Loudoun County Department of Building and Development
1 Harrison Street, S.E.
Leesburg, Virginia 20177

Re: CMPT 2016-0001 AT&T Short Hill
Responses to 2nd Referral

Dear Mr. Barney:

This letter addresses and provides you with a written response to the referral agency comments in the above referenced application. For your convenience, each of the staff comments are stated below and the Applicant's responses follow in bold italics.

LOUDOUN COUNTY DEPARTMENT OF PLANNING AND ZONING – COMMUNITY PLANNING (PAT GIGLIO, 2/29/2016)

In the first referral Community Planning Staff had requested additional information and commitments pertaining to building design, mitigation of visual impacts, landscape buffering, reforestation and tree conservation, mountainside protection, and stormwater management to evaluate the application's conformance with Plan policies.

Building Design/Visual Impact. The applicant in response to first referral comments has confirmed that the proposed one-story building height (35') is the lowest possible and has provided photo-simulations of the building painted with a block pattern of earth tone colors with a lighter color near the roof to better blend with the surrounding forest cover and sky to break up the mass of the building (Sheet 9-12). The photo-simulations illustrate how the building may appear from various vantage points in the surrounding valleys. Based on the photo-simulations it appears that the lighter paint color near the roof line is silhouetted above and through the existing tree line and does not achieve the desired camouflaging effect for the building.

ATTORNEYS AT LAW

703 737 3633 • WWW.THELANDLAWYERS.COM
1 E. MARKET STREET • SUITE 300 • LEESBURG, VA 20176-3014

ARLINGTON 703 528 4700 • WOODBRIDGE 703 680 4664

1. The applicant may consider eliminating the lighter paint color and extend the irregular block pattern of earth tone paint colors to the roof line to better blend with existing forest cover and the ridgeline of the mountain.
2. The applicant may consider including a plat note to avoid confusion in the future describing the proposed earth tone color palette and blocked paint scheme for the building.

Applicant Response: *The applicant's designers determined that the lighter paint color near the roof line blended better with sky where the building was above the tree line. The applicant has included a building design plat note on sheet 1 to commit to the color scheme as shown on sheets 9 – 11 of the plan set.*

Landscaping/Environmental: In response to first referral comments the revised application includes a proposed landscape plan (Sheet 7) depicting areas for replanting and reforestation with native tree species to include deciduous and evergreen trees along the slopes surrounding the existing communications facility and proximate to the proposed one-story building. The plat notes include a list of native tree plantings which will be utilized on the site and specify that a higher percentage of evergreen trees shall be used where screening is a priority. The plat notes on the proposed landscape plan also describe an invasive species mitigation plan for the subject site, but only identifies a long narrow area adjoining the existing parking lot where invasive species are to be controlled. The applicant should consider an invasive species mitigation plan and replanting plan for all the made lands which comprise the subject site where invasive species are most prevalent. Elimination of invasive species and replanting with native species will ensure the long term sustainability of the forest cover on the subject site.

1. The proposed use of native species is supported by environmental policies of the Plan and the landscape plan as presented will aid in softening views of the proposed one-story building.
2. The applicant may consider an invasive species mitigation plan and replanting plan for all the made lands to ensure the long term sustainability of the forest cover on the subject site.
3. The applicant has committed to a stormwater management plan that includes low impact development (LID) practices and a lighting plan that eliminates unnecessary and intrusive light trespass in conformance with the environmental policies of the Plan (Sheet 1).

Applicant Response: *The applicant is committing to an invasive species mitigation plan with replanting using native species as shown on sheet 7 and as recommended by staff.*

RECOMMENDATION

Community Planning Staff finds the general location, character, and extent of the proposed expansion of the existing telephone transmission utility substation use on the subject property is in conformance with the Comprehensive Plan and supports approval of the Commission Permit.

Applicant Response: *The applicant concurs with the community planning recommendation.*

LOUDOUN COUNTY DEPARTMENT OF PLANNING AND ZONING – ENVIRONMENTAL REVIEW (MARCH 4, 2016)

- Staff notes that Figure 1 in the Tree Cover Inventory mentioned on Sheet 6 still has not been provided. Sheet 6 shows locations of proposed planting areas including forested areas that are to be managed due to invasive species. Sheet 6 also has a note that the plan will need to be reviewed by the County Urban forester. Staff recommends that the note be updated to state “reviewed and approved by the County Urban Forester.” Staff also recommends that the note be revised to indicate that the plan will be submitted and implemented concurrent with the first Site Plan for the CMPT use.

Applicant Response: *The Tree Canopy Map is shown on sheet 8. Sheet 7 is the landscape plan sheet showing the proposed planting areas. Note 2 on sheet 7 has been revised as recommended by staff.*

- The property contains Moderately Steep and Very Steep slopes as depicted on Sheet 6. The proposed expansion area now appears to be located outside of the forested Very Steep Slope areas; however, the limits of clearing and grading associated with these areas is unclear. Staff recommends that the limits of clearing and grading be clearly identified on the plan. Staff defers to the County Soil Scientist regarding the status of the Very Steep Slopes and whether or not the proposed disturbances are permitted.

Applicant Response: *The limits of clearing and grading are clearly delineated on sheet 6. Any clearing in areas delineated as Very Steep Slopes is within the made land areas, which is delineated by the solid dark line on sheet 6.*

- Staff notes that on Sheet 4, it is still unclear as to whether the “Expansion Drainfield” is existing or proposed. Staff also notes that the proposed road is now located directly outside of the Highly Sensitive MDOD (Mapping Unit 50D). It is unclear if grading for the road will require work within that mapping unit. Staff recommends that the limits of clearing and grading be clearly identified on the plan. Any work within Highly Sensitive MDOD (Mapping Unit 50D) may require a special exception per Section 4-1603(A) of the Revised 1993 Zoning Ordinance. Staff defers to the County Soil Scientist regarding the status of these areas within the MDOD and whether or not the proposed disturbances are permitted (if needed).

Applicant Response: *The existing conditions plan shown on sheet 2 indicates that the expansion drainfield is proposed. The proposed grading for the road has been removed from mapping unit 50D to avoid clearing within that area. The limits of clearing and grading are delineated on the plan.*

- Staff requests that a note be added to the plat indicating that the application will comply with the noise standards (in regard to the proposed generators and air coolers) in Section 5-1507 of the Revised 1993 Zoning Ordinance. Staff also requests that the labeling for the generators and air coolers be added to Sheets 4 and 5.

Applicant Response: The applicant understands that they are required to comply with the noise standards contained in ZO Section 5-1507. The generators and air coolers are labeled on sheet 5.

- Staff notes that as of April 1st, the Virginia Department of Game and Inland Fisheries (VDGIF) will list the Little Brown Bat and the Tri-colored Bat as State Endangered Species with mandatory conservation measures including time of year restrictions for tree removal. If tree removal is planned, coordination with VDGIF will need to be conducted prior to issuance of the grading permit.

Applicant Response: The applicant appreciates the notification of this requirement.

- There are 4 existing wells, two existing drainfields, and an effluent disposal area identified on Sheet 2. Per the site visit and meetings with the applicant, all water for the site will come from the wells. Staff recommends that the water balance report be submitted to the Water Resources Team to ensure that the wells provide enough water supply for the proposed use.

Applicant Response: The water balance report will be submitted prior to the site plan application submission.

LOUDOUN COUNTY HEALTH DEPARTMENT (JOSHUA HEPNER, 3/1/2016)

This Department reviewed the plat prepared by Parsons Environmental & Infrastructure Group, Inc., dated 1/29/2016, and staff supports the approval of the application with the following reservations:

Prior to receiving recommendation for a building permit, any applicable documentation/engineering regarding the increased load on the existing sewage disposal system, and any associated sewage disposal system expansion, construction or repair applications for permits must be submitted to the Loudoun County Health Department for review and approval. The current system is permitted and designed for 5 employees, working 1 eight hour shift for 5 days per week. The proposed increase in waste load of 60 employees per day, working 3 eight hour shifts for 7 days per week will require modification of the existing design.

Applicant Response: The applicant will submit this information and apply for required permits concurrent with the site plan application.

LOUDOUN COUNTY DEPARTMENT OF PLANNING AND ZONING – ZONING ADMINISTRATION (BRIAN FISH, 3/2/2016)

1. The General Note under the Zoning Requirements – Overlay Zoning Districts on Sheet #1 should be revised to state that the areas of MDOD are subject to the requirements of the *Revised 1993 Loudoun County Zoning Ordinance*.

Applicant Response: *The note on sheet 1 has been revised as recommended by staff.*

LOUDOUN COUNTY DEPARTMENT OF TRANSPORTATION AND CAPITAL INFRASTRUCTURE (MARC DREYFUSS, 3/1/2016)

Transportation Comments and Recommendations

DTCI previously provided comment on this proposed expansion as part of a special exception application (SPEX 2015-0037). That special exception application has been superseded by this commission permit application. Staff comments from the first DTCI referral for SPEX 2015-0037 (November 18, 2015), as well as the Applicant's responses (quoted directly from its February 5, 2016 response letter), and comment statuses are included below, along with an additional new comment specific to the commission permit application.

1. **Initial Staff Comment (SPEX 2015-0037, November 18, 2015):** DTCI has evaluated the Applicant's Traffic Statement and trip generation rates for the proposed development and finds that the traffic impacts from the expanded facility to be minimal and that improvements to the public roadway network are not necessary with this proposal.

Applicant's Response (February 5, 2016): *The Applicant concurs with the DTCI analysis.*

Comment Status: DTCI notes that no traffic study is required for a Commission Permit application. It is noted that the proposed use, as a telecommunications facility, will add minimal trips to the public roadway network. Comment addressed.

Applicant Response: *Comment acknowledged.*

2. **Initial Staff Comment (SPEX 2015-0037, November 18, 2015):** The Applicant needs to ensure that the access to White Rock Road from Harpers Ferry Road is constructed to current VDOT commercial entrance standards. DTCI defers to VDOT for review and further comment on these standards.

Applicant's Response (February 5, 2016): *The Applicant has contacted VDOT, which is in the process of reviewing White Rock Road for conformance to current standards. Modifications will be made if necessary based on their evaluation.*

Comment Status: DTCI again defers to VDOT for review and further comment.

Applicant Response: The VDOT referral comment provided for this application raised no concerns. Additionally, the applicant's engineer contacted the VDOT field office and they did not indicate that any modifications to the entrance would be needed. VDOT will be sent a referral for the site plan application, at which time they will have the opportunity to review the entrance again.

New Comment

3. DTCI notes that the proposed telecommunications facility expansion does not conflict with any existing or planned roadways shown on the 2010 CTP.

Applicant Response: Comment noted.

Conclusion

As proposed with this submission, DTCI could support approval of this application.

Applicant Response: The applicant concurs with the DTCI recommendation.

**LOUDOUN COUNTY DEPARTMENT OF BUILDING AND DEVELOPMENT –
NATURAL RESOURCES (RYAN REED – 3/2/2016)**

Per review the County has the following comments:

- 1) Illustrate the existing tree conservation area pursuant to SPEX-2004-0029.

Applicant Response: The tree conservation area is shown on sheet 2, the existing conditions plan sheet.

- 2) Sheet CMPT-4. Correct the Mountainside Development Overlay District (MDOD) designation to reflect that the area of soil mapping unit 50C is "Sensitive MDOD" instead of partially "Highly Sensitive MDOD." (Preliminary Soils Report 10/10/2006).

Applicant Response: Sheet 4 has been revised as recommended by staff.

- 3) Sheet CMPT-4. Clarify the proposed ultimate limits of clearing and grading, including if necessary the "expansion drainfield." 4-1606.A.3. Additionally, identify the line with the triangles that encroaches into soil mapping unit 50D.

Applicant Response: *The limits of clearing and grading are delineated on sheet 4, including the expansion drainfield area. The encroachment into soil mapping unit 50D has been removed.*

- 4) **Recommendation:** Sheet CMPT-1. Revise Storm Water Management note #1 to indicate that infiltration may be proposed provided the suitability is field verified by the County Soil Scientist prior to final design.

Applicant Response: *The note on sheet 1 has been revised as recommended by staff.*

- 5) **Recommendation:** Sheet CMPT-1. Storm Water Management note #1 consider other innovative stormwater best management practices including, but not limited to vegetated roofs on portions of the project, rooftop disconnection, rainwater harvesting / reuse, etc.

Applicant Response: *The note on sheet 1 has been revised to include some of the BMPs suggested by staff.*

**LOUDOUN COUNTY DEPARTMENT OF BUILDING AND DEVELOPMENT –
URBAN FORESTER (JOHN ZUIKER – 3/1/2016)**

The following urban forestry comments were generated from my review of the plan provided to me on February 9, 2016.

Sheet 7 of 12

1. The legend and sheet shows “proposed plant” areas however this symbol is used on other sheets to depict sensitive slopes. Clarify what this legend identification represents.

Applicant Response: *The legend on sheet 7 has been clarified as requested by staff.*

2. There appears to be symbols for tree and shrub plantings in the upper left corner of this sheet but there is nothing identifying what they represent. Clarify what these symbols represent and provide a note committing to the installation of these plantings.

Applicant Response: *Sheet 7 has been revised as recommended by staff.*

3. There are references to areas to be “replanted, proposed plantings, infill plantings and reforestation” but no description of how this is to be accomplished is provided. Clarify what is meant by each planting area and how they will be implemented; sizes, types, density, etc.

Applicant Response: *The notes on sheet 7 have been revised as recommended by staff.*

4. Soil tests are shown for the reforestation infill areas only however the area where evergreen trees will be planted, near the parking lot, should also be tested to ensure the plant survival. Recommend including this area for soil testing.

Applicant Response: Sheet 7 has been revised to include this area for soil testing.

5. There is a commitment to an invasive plant mitigation plan however the only area identified on the plan for implementation of this plan is the one area near the existing parking lot. Clarify and provide commitment as to the areas that will be covered under the invasive plant mitigation plan.

Applicant Response: Sheet 7 has been revised to indicate the areas covered under the invasive plant mitigation plan.

With this submission, the applicant respectfully requests being placed on the next available planning commission public hearing agenda.

Sincerely,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.



Christine Gleckner, AICP
Land Use Planner

CEG/tlm
Enclosure

cc: John Magyar, Parsons
Mike Fleming, Parsons
Robert Erickson, AT&T



WALSH COLUCCI
LUBELEY & WALSH PC

Christine Gleckner, AICP
Land Use Planner
(571) 209-5776
cgleckner@thelandlawyers.com

March 29, 2016

Via E-Mail Only

Steve Barney, Planner
Loudoun County Department of Planning and Zoning

Re: CMPT-2016-0001, AT&T
Referral Response letter

Dear Steve:

This letter provides responses to the latest round of referral comments.

I. **MARCH 2, 2016 PROJECT MANAGER E-MAIL CORRESPONDENCE**

1. *In the Comment Response Letter or in a revised Statement of Justification, please respond to the following questions:*

a) *Please provide general specifications for the generators.*

Response: The standby generators are 4.0 MW medium voltage diesel generators.

b) *How many staff currently work at the site?*

Response: Currently the only staff working at the site are working on the site preparations for the equipment upgrade and building expansion. Only one full-time AT&T employee currently is assigned to the site.

c) *What is the applicant's proposed timeline to begin and complete construction?*

Response: The applicant plans to submit the site plan application shortly after receiving the commission permit approval and starting construction upon receiving site plan and building permit approvals. The construction timeline is approximately 18-24 months.

2. *On Sheet 1 of the plat, in Note 5, please add the approval date for SPAM-2015-0028 (10/16/15). Please also add CMPT-1962-2157 (approved 4/17/62).*

Response: These dates have been added to the plan.

ATTORNEYS AT LAW

703 737 3633 ■ WWW.THELANDLAWYERS.COM
1 E. MARKET STREET ■ SUITE 300 ■ LEESBURG, VA 20176-3014

ARLINGTON 703 528 4700 ■ WOODBRIDGE 703 680 4664

3. *On Sheet 7 of the plat, Note 2 outlines the proposed Invasive Plant Mitigation Plan but does not provide a timeframe for the development of this plan. Accordingly, staff recommends revising the last sentence of this note to read, “Developed plan shall be reviewed by the Urban Forester prior to approval of the first site plan for this facility.”*

Response: The time frame for the invasive plant mitigation plan will be determined in coordination with the county urban forester and will be included with the site plan application submittal.

4. *On at least one plat sheet, please label the features identified in the graphic.*

Response: The features are labeled on sheets 4 and 5 of the plan.

II. MARCH 11, 2016 COUNTY URBAN FORESTER MEMO

I have reviewed the recent plan submitted, with revised comments dated March 7, 2016, for AT&T Short Hill. All urban forestry comments have been satisfactorily addressed. There are no urban forestry review comments for this plan submission.

Response: Comment Acknowledged.

III. MARCH 18, 2016 COMMUNITY PLANNING E-MAIL CORRESPONDENCE

Community Planning staff has reviewed the most recent submission and notes that the applicant has eliminated the sky blue color proposed near the roof line of the proposed building (sheets 9-12 revised 03/07/16) to better blend with forest cover, however, a plat note has not been included describing the proposed color palette and/or block paint scheme as recommended by staff. The applicant in a subsequent conversation with Community Planning staff on March 17, 2016 has committed to adding a plat note describing the varied blocked paint scheme and a color palette consisting of earth tone colors as depicted in the illustratives. Also in response to comments by county staff, the applicant has expanded the area for the long term invasive plant mitigation plan to include the made lands on the property. Community Planning staff has no additional comments and supports approval of the Commission Permit application.

Response: The note staff requested has been added to Building Design Note 1 on sheet 1 of the revised plan.

IV. March 21, 2016 NATURAL RESOURCES TEAM LEADER MEMO

The County is in receipt of the Commission Permit application for the above stated project. The review is based on the standards set forth in Sections 4-1600 and 5-1508 of the Loudoun County Zoning Ordinance (ZO), and the Facility Standards Manual (FSM). Per review the County has the following comments:

- 1) *Limits of clearing and grading, addressing comment #3 from the Natural Resources Team March 2, 2016 comments, illustrates proposed land disturbing activity within soils mapping unit 50D. Only those limited areas of soil mapping unit 50D that were cleared previously for the existing fence are “sensitive” Mountainside Development Overlay District (MDOD) areas, and the remainder is “highly sensitive.” Adjust limits of clearing and grading to avoid “highly sensitive” MDOD or a Special Exception will be required.*

However, the illustration of the soils map and MDOD delineations appears to be skewed. When ensuring that no land disturbing activity is within the wooded areas of soil mapping unit 50D, staff recommends that the projection of the individual layers are correct.

Response: The plan has been revised to remove land disturbing activities within soils mapping unit 50D. Additionally, the soils map and MDOD delineations have been adjusted to conform to Loudoun County mapping data.

V. **MARCH 22, 2016 PROJECT MANAGER E-MAIL CORRESPONDENCE**

In addition to the attached comments from the referral agencies, Department of Planning & Zoning staff also recommends the following in order to facilitate the review of this application by the Planning Commission:

1. *On Sheet 1, under "Building Design", please correct the application number.*

Response: The plan has been corrected as requested by staff.

2. *On Sheet 5, the Air Cooler labels no longer appear to be aligned with the features being labeled. Please revise.*

Response: The plan has been corrected as requested by staff.

3. *On Sheet 6, the line type for limits of clearing and grading is not readily distinguishable from the line type for watershed boundaries. Please change the line type for watershed boundaries.*

Response: The plan has been corrected as requested by staff.

4. *Sheets 1, 5, and 7 of the plat identify the proposed building square footage as 160,000; however, the Statement of Justification identifies the square footage as approximately 161,000. Please reconcile the two figures by changing either the figure on the plat or the figure in the Statement of Justification.*

Response: The statement of justification has been revised to match the plan.

5. *Please address questions identified in 3/15/16 email from Steve Barney (attached).*

Response: These questions have been addressed in the previous response in this letter.

6. *Please address the following comments from the Department of Building and Development Environmental Review Team:*
 - a. *Sheets 4 and 6 still show the limits of clearing and grading within the forested Highly Sensitive MDOD Mapping Unit 50D. As previously stated, any work within Highly Sensitive MDOD Mapping Unit 50D may require a special exception per Section 4-1603(A) of the Revised 1993 Zoning Ordinance. Staff defers to the County Soil Scientist regarding the status of these areas within the MDOD and whether or not the proposed disturbances are permitted (if needed).*

Response: The limits of clearing and grading have been revised to remain outside of the Highly Sensitive areas of the MDOD. Therefore, no special exception is needed.

- b. *Staff continues to recommend that a note be added to the plat indicating that the application will comply with the noise standard in Section 5-1507 of the Revised Zoning Ordinance in regard to the proposed generators and air coolers.*

Response: The note has been added to sheet 1 of the plan as recommended by staff.

- c. *Staff notes that the applicant states the water balance report will be submitted prior to the site plan application submission. Staff recommends that a note be added to the plat indicating that the*

water balance report will be submitted to the County for review concurrent with the first site plan application.

Response: The note requested by staff has been added as Water and Sewer note on sheet 1 of the plan.

Please contact me if you need any additional information to prepare for the April 26, 2016 planning commission public hearing.

Sincerely,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.

Christine Gleckner, AICP
Land Use Planner

Cc: Robert Erickson, AT&T
John Magyar, Parsons
Mike Fleming, Parsons
Andrew A. Painter, Walsh, Colucci, Lubeley and Walsh

AT&T Short Hill, CMPT-2016-0001
April 26, 2016 Public Hearing
Planning Commission Questions and Applicant / Staff Responses

During the public hearing for the AT&T Short Hill Commission Permit application, Planning Commission members asked several questions to which the applicant or staff responded. The questions and responses are summarized below.

Commissioner question: Would any upgrades to the site's electrical service would be necessary?

Applicant response: Power lines at site would be upgraded but no additional lines to the site will be added.

Commissioner question: Would it be possible to add a plat note stating that there will be no additional utility poles?

Applicant response: Yes, a note could be added stating that there will be no additional poles serving the site.

Commissioner question: What is the size of the building footprint?

Staff response: Approximately 95,000 square feet; a portion of the building contains two stories.

Commissioner question: Would it be more appropriate to provide deciduous trees instead of making evergreen trees a priority, in order to make the plantings more consistent with existing landscape?

Applicant response: The proposed landscape would be a combination of evergreen and deciduous trees. The landscaping shown on the plat is conceptual and can be adjusted as needed.

Commissioner question: How was the nature of the land use determined? Aren't these types of facilities typically significantly smaller?

Staff response: The facility would primarily serve as part of regional grid system and involves switching of telephone signals. This matches the Zoning Ordinance definition of "Utility Substation, Transmission." The use determination was based on information provided by the applicant. Also, the Zoning Ordinance definition of "Utility" states that data equipment is permitted as an accessory use.

Commissioner question: In upgrading the electrical service, will the poles be converted to metal poles and/or be replaced with larger or taller poles?

Applicant response: The same poles will be used.

Commissioner question: Will there be lighting on the building?

Applicant response: Yes, but solely for safety purposes. Lighting will not be located on the roof or the top portion of the building.

Commissioner question: Did the applicant consider locating the building partially underground or designing it as a one-story building?

Applicant response: The building was sized to contain large equipment. The amount of added square footage that would be required in order to locate all elements on one floor would expand the building footprint and require additional disturbed area. To locate the building partially underground would require a considerable amount of re-evaluation of the site engineering.

Commissioner question: What was the outreach program?

Applicant response: To advertise the March 14 community meeting, letters were sent to adjacent property owners and to the Between the Hills Community Association.



VICINITY MAP
SCALE: 1" = 1000'-0"

APPLICANT: PARSONS ENVIRONMENT & INFRASTRUCTURE GROUP, INC.

AT&T

CMPT 2016-0001, EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

DRAWING INDEX

- CMPT-1 COVER SHEET
- CMPT-2 EXISTING CONDITIONS
- CMPT-3 OVERALL SITE
- CMPT-4 MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOO)
- CMPT-5 MDOO ENLARGED PLAN
- CMPT-6 SOILS, SLOPES, AND DRAINAGE
- CMPT-7 PROPOSED LANDSCAPE PLAN
- CMPT-8 REGULATORY LETTERS
- CMPT-9 WEST FACE SIMULATION - SUMMER
- CMPT-10 EAST FACE SIMULATION - SUMMER
- CMPT-11 WEST FACE SIMULATION - WINTER
- CMPT-12 EAST FACE SIMULATION - WINTER

CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CONTRACT NUMBER: 407-00446

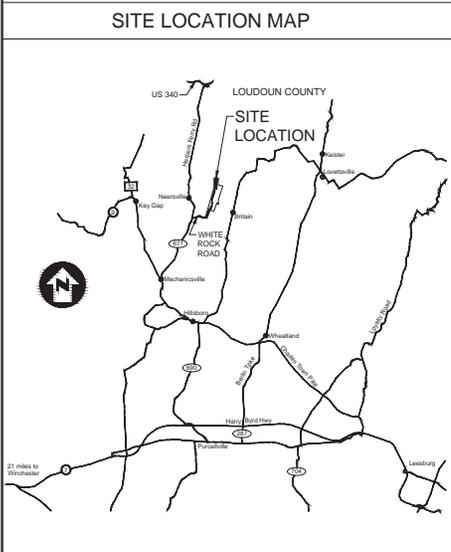
REVISIONS / AUTHORIZATIONS

NO.	REVISIONS / AUTHORIZATIONS	DATE	DESIGN	CHKD	APPROV
0	ISSUE FOR USE	01/29/16	ICE	MAF	
1	REVISED PER COMMENTS	03/07/16	ICE	MAF	
2	REVISED PER COMMENTS	03/29/16	ICE	MAF	

PROJECT TITLE: AT&T
EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: COVER SHEET

PROJECT NUMBER: 449040	DATE: 01-22-16	SCALE: NONE
DESIGNED BY: RIR	CHECKED BY: MCF	
DRAWN BY: JG	DATE: 01-12-16	SHEET: 1
DRAWING NO.: CMPT-1		SHEET NO.: 1



GENERAL NOTES OR BUILDING REQUIREMENTS

ELECTION DISTRICT: BLUE RIDGE AND CATOCTIN (ALL PROPOSED WORK IS IN THE CATOCTIN DISTRICT)
MINISTERIAL DISTRICT: CATOCTIN
TAX MAP: #10095W
PIN NO.: 47326789

ZONING REQUIREMENTS:
PARCELS: 152, 176.36 AC (LOUDOUN COUNTY LEGAL ACRES: 138.81 AC)
EXPANSION AREA: 15.3 AC

ZONING: 481
 APPLICABLE VERSION OF ZONING ORDINANCE: REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE
 OVERLAY ZONING DISTRICTS: MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT
 THERE ARE HIGHLY SENSITIVE AND SENSITIVE MDOO, SUBJECT TO THE REQUIREMENTS OF THE ORDINANCE IN EFFECT PRIOR TO JANUARY 7, 2003. ADDITIONALLY, THERE ARE MODERATELY STEEP (15-20%) AND VERY STEEP (GREATER THAN 25%) SLOPES SUBJECT TO THE REQUIREMENTS OF THE REVISED 1993 ORDINANCE.

PERFORMANCE STANDARDS: THIS PLAN SHALL MEET THE CRITERIA FOUND IN SECTION 4 - 1004 OF THE 1993 LOUDOUN COUNTY ZONING ORDINANCE.
LAND DISTURBING ACTIVITIES: ANY LAND DISTURBING ACTIVITIES IN VERY STEEP SLOPES WILL COMPLY WITH SECTION 5-1006 OF THE REVISED 1993 ORDINANCE.

LOT AND BUILDING REQUIREMENTS	REQUIREMENT	ACTUAL
MINIMUM LOT AREA	20 AC	N/A
MINIMUM LOT WIDTH	200 FT	N/A
MINIMUM FRONT, SIDE, AND REAR YARDS	25 FT	>200 FT
MINIMUM LOT COVERAGE	5%	0%
MINIMUM BUILDING HEIGHTS	3'	>2'
PROPOSED NUMBER OF LOTS	N/A	1 (ENHANCED)
BUFFER	TYPE 4	100' NATURAL VEGETATION

LOT ADDRESS: EXISTING 16 FOOT WIDE PAVED PRIVATE ACCESS ROAD CONNECTING TO HARRER'S FERRY ROAD

PROPOSED BUILDING:
 NUMBER OF FLOORS: 2
 FLOOR AREA: 180,000 S.F.
 HEIGHT: 35'
 EXTERIOR DIMENSIONS: 433' X 223'
 USE: TELEPHONE TRANSMISSION UTILITY SUBSTATION

EXISTING ABOVE GROUND BUILDINGS:
 BUILDING 1: 400 S.F.
 BUILDING 2: 300 S.F.
 BUILDING 3: 218 S.F.
 BUILDING 4: 585 S.F.

TRANSPORTATION:
 TRAFFIC WILL BE GENERATED BY AN INCREASE IN STAFF OF UP TO 40 PEOPLE DIVIDED INTO 3 SHIFTS. THE NUMBER OF ONE-WAY TRIPS IS ANTICIPATED TO BE AS FOLLOWS:
 AM PEAK HOUR: 45
 PM PEAK HOUR: 45
 NIGHT PEAK HOUR: 20

GENERAL NOTES:

- NAME AND ADDRESS OF THE OWNER OF RECORD
 AT&T OF VIRGINIA
 J. Debra Swartz
 PO BOX 720
 ROCKHILL, NJ 07871
- DETAILED SOIL/SITE INVESTIGATION REPORTS TO SUPPORT THE DESIGN OF AN ON-SITE EFFLUENT DISPOSAL SYSTEM HAVE BEEN PREPARED, SUBMITTED, AND APPROVED BY THE LOUDOUN COUNTY HEALTH DEPARTMENT AND VIRGINIA DEPARTMENT OF HEALTH. (PRELIMINARY ENGINEERING PROPOSAL, DATED NOVEMBER 24, 2003, PREPARED BY HMM, INC.). (SEE LETTER FROM MR. ALLEN BREWER DATED JANUARY 21, 2004 OF SITE PLAN SUBMITTAL 2004-0005)
- THE PARCELS CONTAINS APPROXIMATELY 175.36 ACRES ACCORDING TO DEED BOOK 420 PAGE 291. THE ACREAGE IS PRIMARILY WOODED. ONLY 1.9% OF THE SITE IS COVERED BY BUILDINGS. STORM DRAINAGE FLOWS DOWN THE SLOPES OF SHORT HILL MOUNTAIN AS SHEET FLOW, BECOMING CONCENTRATED IN INTERMITTENT DRAINAGE WAYS AS IT FLOWS DOWN THE SLOPE.
- SOURCE OF TITLE: DEED BOOK 426 PAGE 291
- APPLICATIONS APPLICABLE TO THIS PARCEL:
 - CMPT-160-21ST, APPROVED APRIL 17, 1983
 - SOIL MAPS AND PRELIMINARY SOILS REVIEW WAIVER, JANUARY 11, 2005 (SPEX 2004-0009)
 - SPEX 2004-0020 APPROVED BY SOCS ON MARCH 8, 2005
 - SPEX 2004-0009, APPROVED MAY 2, 2005
 - GEOTECHNICAL REPORT W/AV 2004-0008 APPROVED JULY 2, 2005
 - WAV 2015-0028, APPROVED SEPTEMBER 24, 2015
 - SIFAM 2015-0028, APPROVED OCTOBER 18, 2015

EXTERIOR LIGHTING:

- EXTERIOR LIGHTING WILL BE DESIGNED TO PROVIDE ADEQUATE NIGHT TIME VISIBILITY FOR SECURITY AND SAFETY OF PERSONNEL WALKING AROUND THE FACILITY. LIGHTING LEVELS WILL BE KEPT TO A MINIMUM SO THAT THE VISIBILITY OF THE SITE IS KEPT LOW FOR SURROUNDING AREAS. LIGHTING LEVELS AT THE PROPERTY LINE WILL BE KEPT TO THE MINIMUM ALLOWED USING STRATEGIC PLACEMENT OF FIXTURES IN CONJUNCTION WITH LIGHTING SHIELDS.
- LIGHT FIXTURES WILL USE ENERGY EFFICIENT LEDS WITH PHOTOCELL CONTROL FOR COMMON AREAS SUCH AS EXTERIOR DOORS, PARKING AND SIDEWALKS. EQUIPMENT YARDS WHICH WILL REQUIRE MAINTENANCE WILL HAVE MANUAL LIGHTING THAT IS ONLY TURNED ON WHEN MAINTENANCE OR INSPECTION OF EQUIPMENT IS TAKING PLACE.
- LIGHTING DESIGN FEATURES INCLUDE:
 - EGRESS LIGHTING FOR ALL EXTERIOR PERSONNEL DOORS WITH EMERGENCY BACKUP POWER
 - BOLLARD LIGHTING AND POST TOP FIXTURES FOR THE PARKING AREAS AND SIDEWALKS
 - AUTOMATIC PHOTOCELL CONTROL FOR COMMON AREAS
 - MANUAL LIGHTING CONTROL FOR EQUIPMENT AREAS

ENVIRONMENTAL FEATURES:

- GRAVES AND CEMETERIES: THE PROJECT SITE OCCURS IN PREVIOUSLY DEVELOPED AREAS OF THE PARCEL WHERE NO GRAVES AND CEMETERIES HAVE BEEN OBSERVED.
- ENDANGERED SPECIES HABITAT: IT IS NOT ANTICIPATED THAT THIS PROJECT WILL ADVERSELY AFFECT THE NATURAL HERITAGE RESOURCES. (SEE DRAWING SPEX 18 FOR DETAILED LETTERS TO AGENCIES)
- ARCHAEOLOGICAL FEATURES: THE PROJECT SITE OCCURS IN AREAS PREVIOUSLY SUBMITTED TO SIGNIFICANT GRADING AND GROUND DISTURBANCE, AND IN AREAS THAT HAVE BEEN REVIEWED FOR ARCHAEOLOGICAL AND ARCHITECTURAL RESOURCES. AN INVESTIGATION OF THE SITE IS SELECTED FOR POTENTIAL CRIP BRIGATION INDICATED THAT NO SITES OR STRUCTURES WERE IDENTIFIED. (SEE DRAWING SPEX 18 FOR DEPARTMENT OF HISTORIC RESOURCES LETTER FOR INVESTIGATION RELATED TO SPEX 2004-0009)
- HAZARDOUS OR TOXIC SUBSTANCES: DIESEL FUEL IS STORED ON SITE FOR EMERGENCY GENERATOR USE. THERE ARE NO OTHER KNOWN TOXIC OR HAZARDOUS SUBSTANCES ON SITE.
- FEDERAL, STATE REGULATIONS: THERE ARE NO KNOWN FEDERAL OR STATE REGULATIONS THAT WOULD IMPOSE LIMITATIONS ON THE PROPOSED DEVELOPMENT.

WATER AND SEWER:

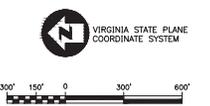
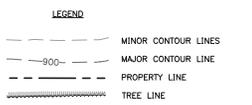
- WATER FOR THE SITE IS PROVIDED BY EXISTING ON-SITE WELLS
- SEWAGE TREATMENT ON SITE CONSISTS OF SEPTIC TANK AND GRAIN FIELD. THIS SYSTEM WILL BE MODIFIED TO HANDLE ADDITIONAL STAFFING EXPECTED FOR THE FACILITY.
- A WATER BALANCE REPORT COVERING WATER USE AND SEWAGE DISPOSAL ON SITE WILL BE SUBMITTED TO THE COUNTY FOR REVIEW CONCURRENT WITH THE SITE PLAN APPLICATION.

NOISE STANDARDS:

- THE PROPOSED FACILITIES, INCLUDING BUT NOT LIMITED TO GENERATORS AND COOLING SYSTEMS, WILL COMPLY WITH THE NOISE STANDARDS DEFINED IN SECTION 5-1507 OF THE REVISED 1993 ZONING ORDINANCE.

BUILDING DESIGN:

- WITH THIS SUBMISSION OF THE REVISED APPLICATION, THE APPLICANT HAS MADE COMMITMENTS TO MITIGATE THE VISUAL IMPACTS OF THE BUILDING THROUGH A COLOR SCHEME FOR THE BUILDING THAT BLENDS WITH THE SURROUNDING LANDSCAPE, LANDSCAPING, REFORESTATION, MOUNTAINSIDE PROTECTION AND STORMWATER MANAGEMENT. THE BUILDING WILL HAVE A VISIBLE BLOCK PAINT SCHEME CONSISTING OF VARIOUS EARTH TONES INCLUDING BUT NOT LIMITED TO FEDERAL STANDARD 856C COLORS 3069A, 3094B, 3407B, 3418D, AND 3409I. THESE COMMITMENTS ARE ILLUSTRATED ON CMPT 2016-0001 SHEETS 9, 10, 11, AND 12.



CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CORPORATE LICENSE # 407-004446

REVISIONS / AUTHORIZATIONS					
NO.	REVISION / AUTHORIZING	DATE	BY	CHKD	APPV
0	ISSUE FOR USE	01/26/18	KZL	MBF	
1	REVISED PER COMMENTS	02/02/18	KZL	MBF	

PROJECT TITLE: **AT&T**
EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

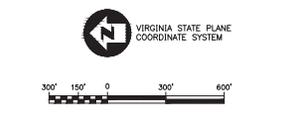
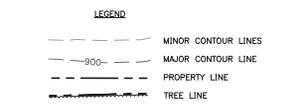
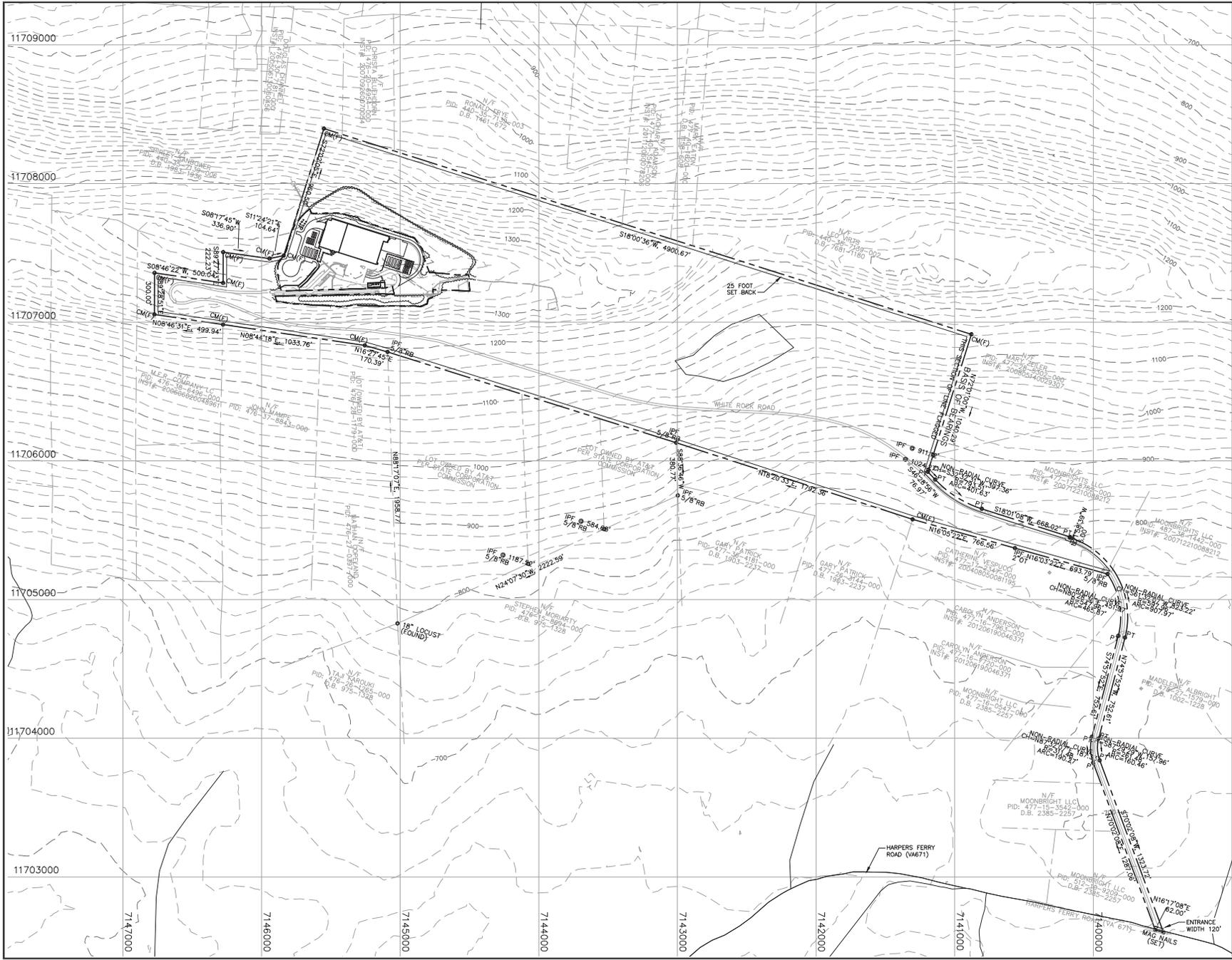
SHEET TITLE: **EXISTING CONDITIONS**

PROJECT NUMBER: **449040** DATE: 01-22-18 SCALE: 1" = 300'-0"

DRAWN BY: KDI CHECKED BY: MBF

SHEET 2 OF 12 SHEETS SHEET NO. **CMPT-2**

DRAWING NO. **2**



CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CORPORATE LICENSE # 407-004446

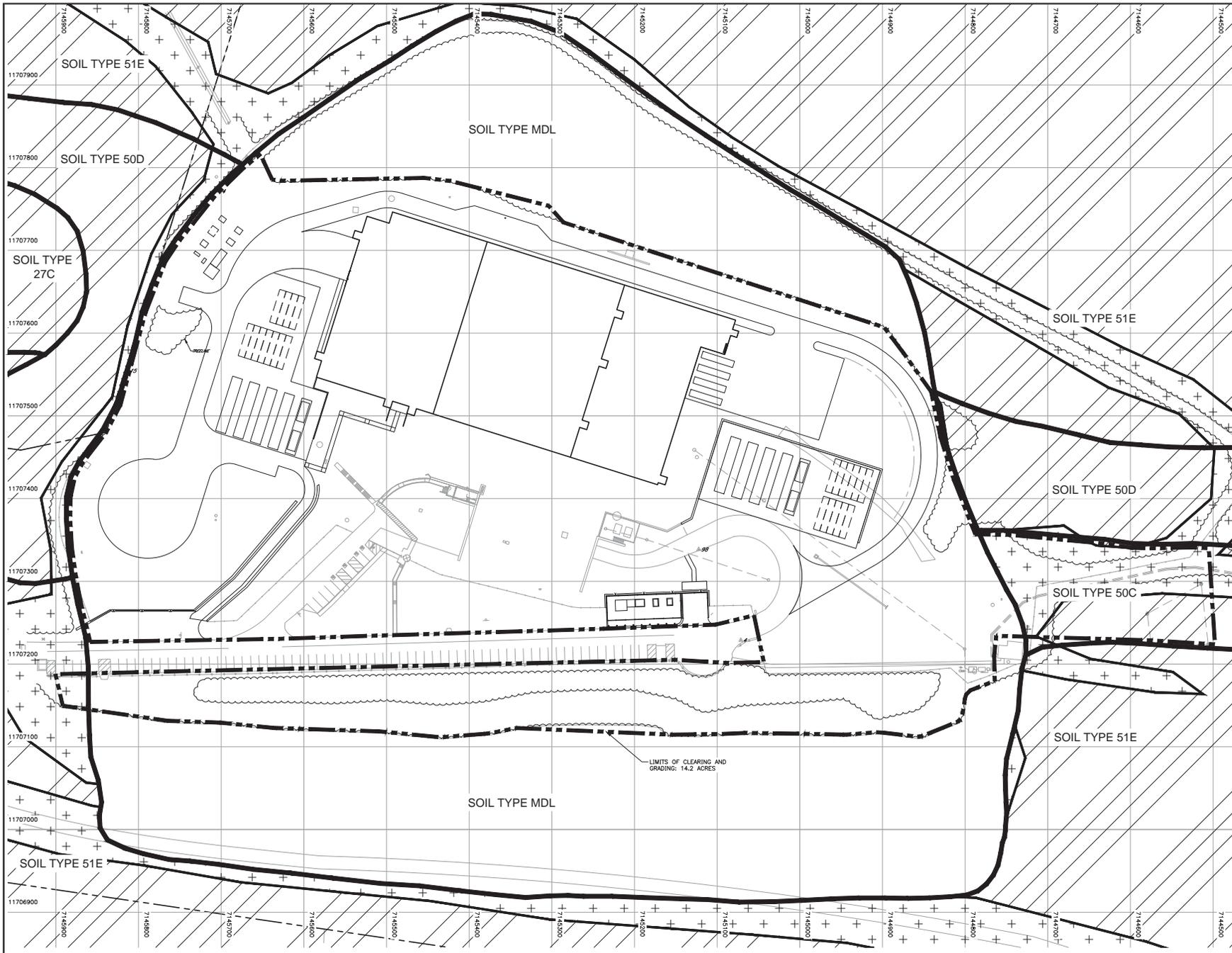
REVISIONS / AUTHORIZATIONS

NO.	REVISION / AUTHORIZATIONS	DATE	BY	CHKD	APPVD
0	ISSUED FOR USE	01-29-18	KZL	MEF	
1	PROPERTY UPDATE	02/02/18	KZL	MEF	

PROJECT TITLE: **AT&T**
EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: **OVERALL SITE**

PROJECT NUMBER: 449040	DATE: 01-22-18	SCALE: 1" = 300'-0"
DRAWN BY: KDI	CHECKED BY: MEF	
SHEET 3 OF 12 SHEETS	SHEET NO.	
DRAWING NO.: CMPT-3		
3		



- LEGEND**
- FENCE
 - - - PROPERTY LINE
 - HIGHLY SENSITIVE
 - SENSITIVE
 - MADE LAND
 - SOMEWHAT SENSITIVE
 - PROPOSED CONSTRUCTION
 - EXISTING FACILITIES
 - LIMITS OF CLEARING AND GRADING

NOTES:

- SOIL TYPE, SENSITIVITY AND SLOPE INFORMATION OBTAINED FROM THE LOUDOUN COUNTY GIS.



CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CORPORATE LICENSE # 407-004446

REVISIONS / AUTHORIZATIONS

NO.	REVISIONS / AUTHORIZATIONS	DATE	OWNER	DATE	BY/APP.
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISION FOR COMMENTS	02/02/16	KZI	MBF	
2	REVISION FOR COMMENTS	02/26/16	KZI	MBF	

PROJECT TITLE: **AT&T**

EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: **MOUNTAINSIDE DEVELOPMENT OVERLAY DISTRICT (MDOD)**

PROJECT NUMBER: 449040

DATE: 01-22-16

SCALE: 1" = 300'-0"

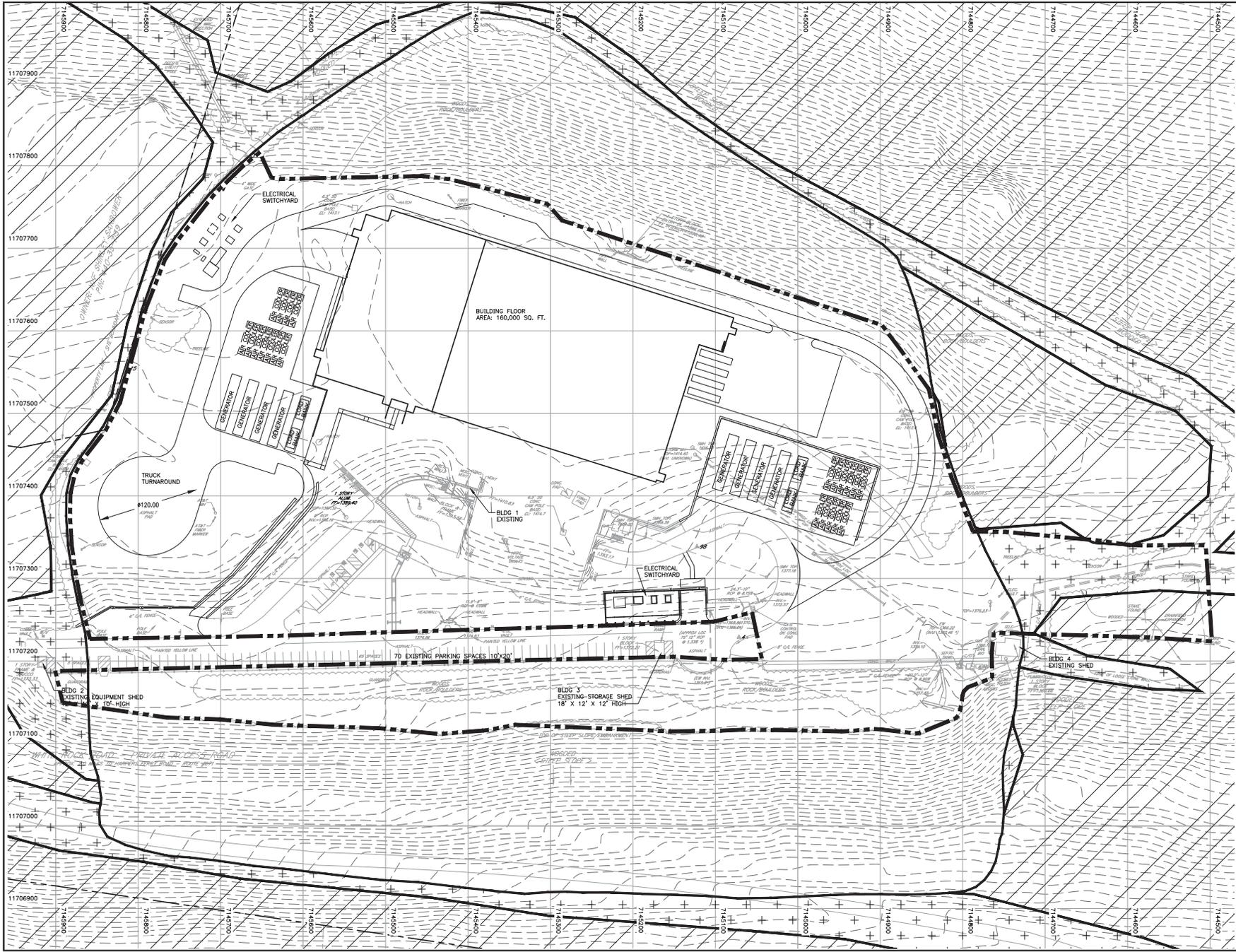
DRAWN BY: KZI

CHECKED BY: MBF

SHEET: 4 OF 12 SHEETS

DRAWING NO.: **CMPT-4**

SHEET NO.: 4



- LEGEND**
- FENCE
 - - - PROPERTY LINE
 - - - 4 FOOT CONTOURS
 - HIGHLY SENSITIVE
 - SENSITIVE
 - MADE LAND
 - SOMEWHAT SENSITIVE MDL

NOTES:
 1. SOIL TYPE, SENSITIVITY AND SLOPE INFORMATION OBTAINED FROM THE LOUDOUN COUNTY GIS.



CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
 CHARLOTTE, NC 28209
 704-529-6246

CORPORATE LICENSE # 407-004446

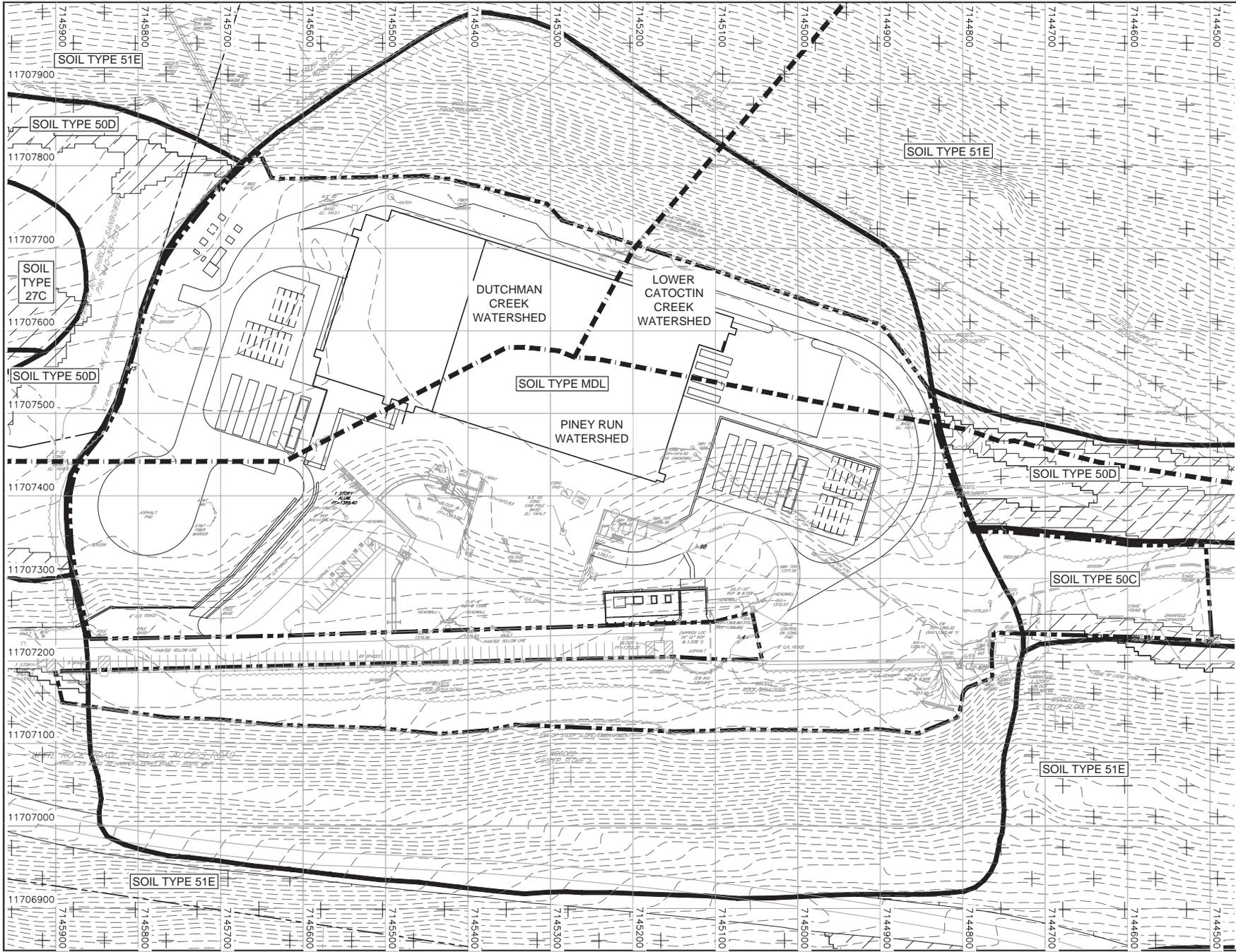
REVISIONS / AUTHORIZATIONS

NO.	REVISION / AUTHORIZING	DATE	BY	CHKD	APP'D
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISED FOR COMMENTS	03/02/16	KZI	MBF	
2	REVISED FOR COMMENTS	03/26/16	KZI	MBF	

PROJECT TITLE: **AT&T**
EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: **MDOD ENLARGED PLAN**

PROJECT NUMBER: 449040	DATE: 01-22-2016	SCALE: 1" = 50'-0"
DRAWN BY: KDI	CHECKED BY: MBF	
SHEET 5 OF 12 SHEETS	SHEET NO.	
DRAWING NO.: CMPT-5		5



LEGEND

- FENCE
- PROPERTY LINE
- 4 FOOT EXISTING CONTOURS
- WATERSHED DIVISION LINE
- MODERATELY STEEP (15 TO 25%)
- VERY STEEP (25%)
- LIMITS OF CLEARING AND GRADING

NOTES:

- SOIL TYPE, SENSITIVITY AND SLOPE INFORMATION OBTAINED FROM THE LOUDOUN COUNTY GIS.

VIRGINIA STATE PLANE COORDINATE SYSTEM

50' 25' 0 50' 100'

CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CORPORATE LICENSE # 407-004446

REVISIONS / AUTHORIZATIONS

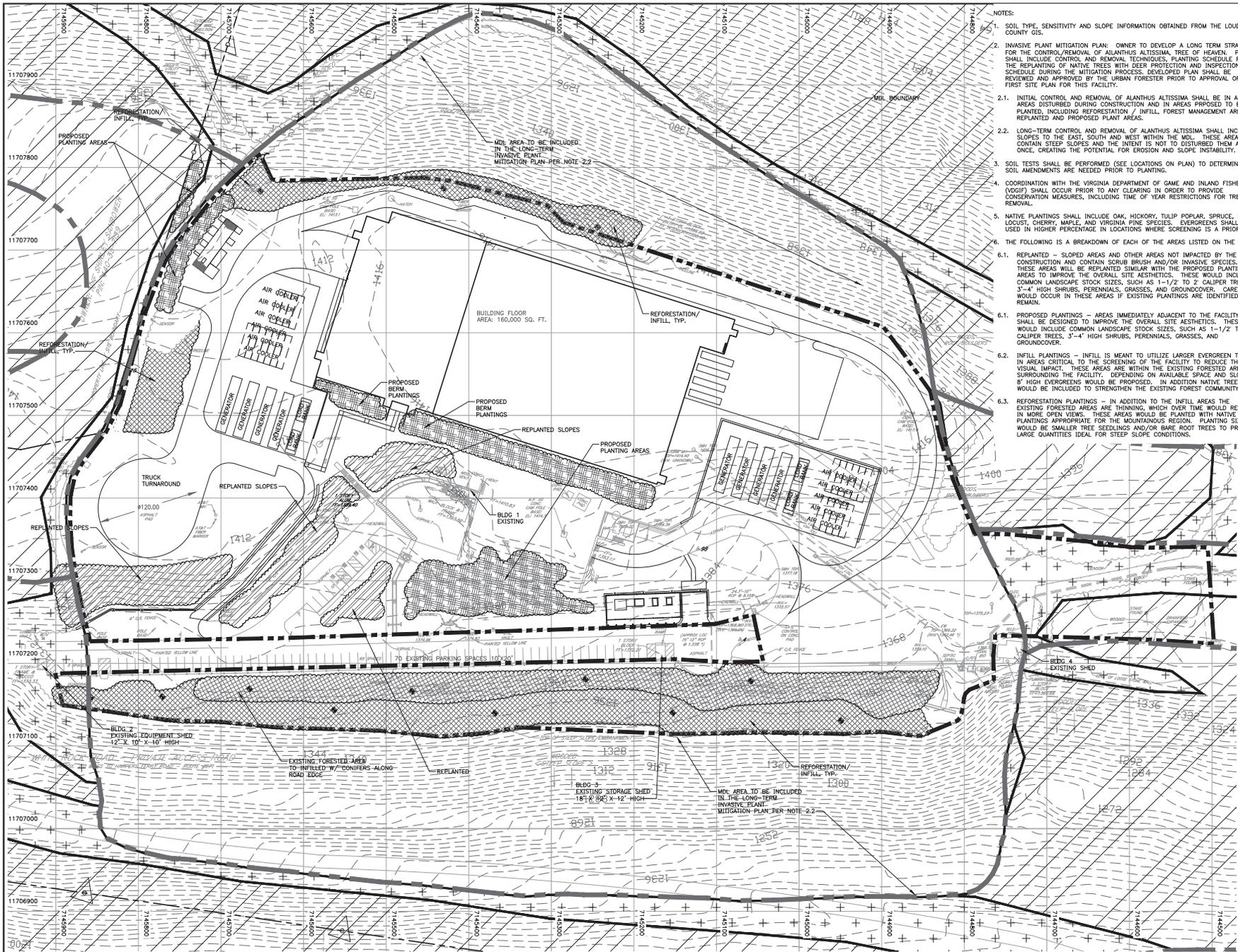
NO.	REVISION / AUTHORIZING	DATE	BY	CHKD	APPV
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISED FOR COMMENTS	03/02/16	KZI	MBF	
2	REVISED FOR COMMENTS	03/26/16	KZI	MBF	

PROJECT TITLE: AT&T
EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: SOILS, SLOPES AND DRAINAGE

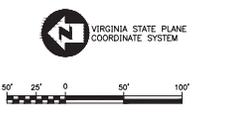
PROJECT NUMBER: 449040
DATE: 01-22-16
SCALE: 1" = 50'-0"

AUTHORIZATION: DRAWN BY: KDI
CHECKED BY: MBF
SHEET: 6 OF 12 SHEETS
DRAWING NO.: CMPT-6
SHEET NO.: 6



- NOTES:
- SOIL TYPE, SENSITIVITY AND SLOPE INFORMATION OBTAINED FROM THE LENOIR COUNTY GIS.
 - INVASIVE PLANT MITIGATION PLAN: OWNER TO DEVELOP A LONG TERM STRATEGY FOR THE CONTROL/REMOVAL OF ALANTHUS ALTISSIMA, TREE OF HEAVEN. PLAN SHALL INCLUDE CONTROL AND REMOVAL TECHNIQUES, PLANTING SCHEDULE FOR THE REPLANTING OF NATIVE TREES WITH DEER PROTECTION AND INSPECTION SCHEDULE DURING THE MITIGATION PROCESS. DEVELOPED PLAN SHALL BE REVIEWED AND APPROVED BY THE URBAN FORESTER PRIOR TO APPROVAL OF THE FIRST SITE PLAN FOR THIS FACILITY.
 - INITIAL CONTROL AND REMOVAL OF ALANTHUS ALTISSIMA SHALL BE IN ALL AREAS DISTURBED DURING CONSTRUCTION AND IN AREAS PROPOSED TO BE REPLANTED, INCLUDING REFORESTATION / INFILL, FOREST MANAGEMENT AREAS, REFORESTED AND PROPOSED PLANT AREAS.
 - LONG-TERM CONTROL AND REMOVAL OF ALANTHUS ALTISSIMA SHALL INCLUDE SLOPES TO THE EAST, SOUTH AND WEST WITHIN THE MDL. THESE AREAS CONTAIN STEEP SLOPES AND THE INTENT IS NOT TO DISTURB THEM ALL AT ONCE, CREATING THE POTENTIAL FOR EROSION AND SLOPE INSTABILITY.
 - SOIL TESTS SHALL BE PERFORMED (SEE LOCATIONS ON PLAN) TO DETERMINE IF SOIL AMENDMENTS ARE NEEDED PRIOR TO PLANTING.
 - COORDINATION WITH THE VIRGINIA DEPARTMENT OF GAME AND INLAND FISHERIES (VDGIF) SHALL OCCUR PRIOR TO ANY CLEARING IN ORDER TO PROVIDE CONSERVATION MEASURES, INCLUDING TIME OF YEAR RESTRICTIONS FOR TREE REMOVAL.
 - NATIVE PLANTINGS SHALL INCLUDE OAK, HICKORY, TULIP POPLAR, SPRUCE, BLACK LOCUST, CHERRY, MAPLE, AND VIRGINIA PINE SPECIES. EVERGREENS SHALL BE USED IN HIGHER PERCENTAGE IN LOCATIONS WHERE SCREENING IS A PRIORITY.
 - THE FOLLOWING IS A BREAKDOWN OF EACH OF THE AREAS LISTED ON THE PLAN:
 - REPLANTED - SLOPED AREAS AND OTHER AREAS NOT IMPACTED BY THE CONSTRUCTION AND CONTAIN SCRUB BRUSH AND/OR INVASIVE SPECIES. THESE AREAS WILL BE REPLANTED SIMILAR WITH THE PROPOSED PLANTING AREAS TO IMPROVE THE OVERALL SITE AESTHETICS. THESE WOULD INCLUDE COMMON LANDSCAPE STOCK SIZES, SUCH AS 1-1/2" TO 2" CALIPER TREES, 3"-4" HIGH SHRUBS, PERENNIALS, GRASSES, AND GROUNDCOVER. CARE WOULD OCCUR IN THESE AREAS IF EXISTING PLANTINGS ARE IDENTIFIED TO REMAIN.
 - PROPOSED PLANTINGS - AREAS IMMEDIATELY ADJACENT TO THE FACILITY AND SHALL BE DESIGNED TO IMPROVE THE OVERALL SITE AESTHETICS. THESE WOULD INCLUDE COMMON LANDSCAPE STOCK SIZES, SUCH AS 1-1/2" TO 2" CALIPER TREES, 3"-4" HIGH SHRUBS, PERENNIALS, GRASSES, AND GROUNDCOVER.
 - INFILL PLANTINGS - INFILL IS MEANT TO UTILIZE LARGER EVERGREEN TREES IN AREAS CRITICAL TO THE SCREENING OF THE FACILITY TO REDUCE THE VISUAL IMPACT. THESE AREAS ARE WITHIN THE EXISTING FORESTED AREAS SURROUNDING THE FACILITY. DEPENDING ON AVAILABLE SPACE AND SLOPES, 8" HIGH EVERGREENS WOULD BE PROPOSED. IN ADDITION NATIVE TREES WOULD BE INCLUDED TO STRENGTHEN THE EXISTING FOREST COMMUNITY.
 - REFORESTATION PLANTINGS - IN ADDITION TO THE INFILL AREAS THE EXISTING FORESTED AREAS ARE THINNING WHICH OVER TIME WOULD RESULT IN MORE OPEN VIEWS. THESE AREAS WOULD BE PLANTED WITH NATIVE PLANTINGS APPROPRIATE FOR THE MOUNTAINOUS REGION. PLANTING SIZES WOULD BE SMALLER TREE SEEDLINGS AND/OR BARE ROOT TREES TO PROVIDE LARGE QUANTITIES IDEAL FOR STEEP SLOPE CONDITIONS.

- LEGEND
- FENCE
 - - - PROPERTY LINE
 - - - 4 FOOT CONTOURS
 - [Cross-hatched] REFORESTATION/ INFILL PLANTING AREAS
 - [Diagonal lines] REPLANTED AREAS
 - [Grid pattern] PROPOSED PLANTING AREAS
 - - - MDL BOUNDARY
 - ◆ SOIL TEST LOCATION



CONSULTANT STAMP

PARSONS

OFFICE: 4701 HEDGEMORE DRIVE
CHARLOTTE, NC 28209
704-529-6246

CORPORATE LICENSE # 407-004446

REVISIONS / AUTHORIZATIONS

NO.	REVISION / AUTHORIZING	DATE	BY	CHKD	APP'D
0	ISSUED FOR USE	1/29/16	KZ	MBF	
1	REVISED FOR COMMENTS	02/02/16	KZ	MBF	

PROJECT TITLE: **AT&T**

EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION

SHEET TITLE: **PROPOSED LANDSCAPE PLAN**

PROJECT NUMBER: **449040**

DATE: 01-22-16

SCALE: 1" = 50'-0"

DRAWN BY: K01

CHECKED BY: MBF

SHEET 7 OF 12 SHEETS

DRAWING NO.: **CMPT-7**

SHEET NO.: **7**



KEY PLAN



EXISTING CONDITIONS



PROPOSED CONSTRUCTION (WITH TREES REMOVED FOR CLARITY)



FINAL CONDITIONS



PROPOSED CONSTRUCTION WITH LANDSCAPING

CONSULTANT STAMP					
PARSONS					SEALED
OFFICE 4701 HEDGEMORE DRIVE CHARLOTTE, NC 28209 704-529-6246					
CORPORATE LICENSE # 407-004446					
REVISIONS / AUTHORIZATIONS					
NO.	REVISIONS / AUTHORIZATIONS	DATE	DESIGN	CHECK	APPROVED
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISED FOR COMMENTS	02/02/16	KZI	MBF	
PROJECT TITLE: AT&T EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION					
SHEET TITLE: EAST FACE SIMULATION SUMMER					
PROJECT NUMBER: 449040	DATE: 01-22-16	SCALE: NONE			
AUTHORIZATION:	DRAWN BY: KDI	CHECKED BY: MBF			
DRAWING NO.:	SHEET: 10	OF: 12	SHEETS:	SHEET NO. 10	
CMPT-10					



KEY PLAN



EXISTING CONDITIONS



PROPOSED CONSTRUCTION (WITH TREES REMOVED FOR CLARITY)



FINAL CONDITIONS

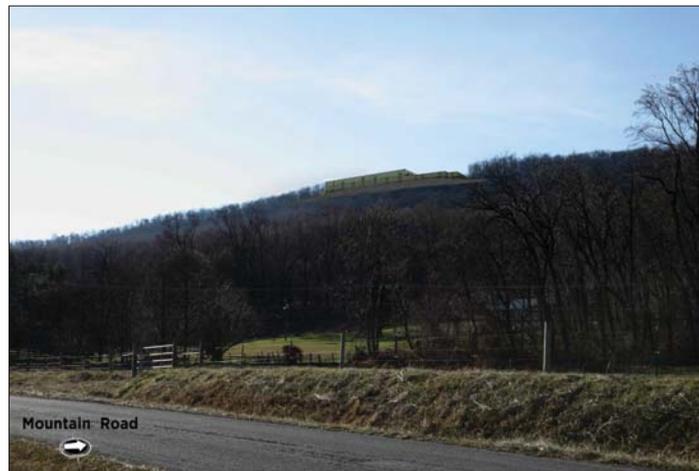
CONSULTANT STAMP					
PARSONS					SEALED
OFFICE 4701 HEDGEMORE DRIVE CHARLOTTE, NC 28209 704-529-6246					
CORPORATE LICENSE # 407-004446					
REVISIONS / AUTHORIZATIONS					
NO.	REVISIONS / AUTHORIZATIONS	DATE	DESIGN	DRAWN	APPROVED
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISED FOR COMMENTS	02/02/16	KZI	MBF	
2	REVISED FOR COMMENTS	02/26/16	KZI	MBF	
PROJECT TITLE: AT&T EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION					
SHEET TITLE: WEST FACE SIMULATION WINTER					
PROJECT NUMBER: 449040	DATE: 01-22-16	SCALE: NONE			
AUTHORIZATION:	DRAWN BY: KZI	CHECKED BY: MBF	SHEET NO.:		
DRAWING NO.:	SHEET: 11	OF: 12	SHEETS:	SHEET NO. 11	
CMPT-11					



KEY PLAN



EXISTING CONDITIONS



PROPOSED CONSTRUCTION (WITH TREES REMOVED FOR CLARITY)



FINAL CONDITIONS



PROPOSED CONSTRUCTION WITH LANDSCAPING

CONSULTANT STAMP					
PARSONS					SEALED
OFFICE					
4701 HEDGEMORE DRIVE CHARLOTTE, NC 28209 704-529-6246					
CORPORATE LICENSE # 407-004446					
REVISIONS / AUTHORIZATIONS					
NO.	REVISIONS / AUTHORIZATIONS	DATE	DESIGN	CHECK	APPROVED
0	ISSUED FOR USE	01/26/16	KZI	MBF	
1	REVISED FOR COMMENTS	02/02/16	KZI	MBF	
PROJECT TITLE:					
AT&T EXPANSION OF EXISTING TELEPHONE TRANSMISSION UTILITY SUBSTATION					
SHEET TITLE:					
EAST FACE SIMULATION WINTER					
PROJECT NUMBER:	DATE:	SCALE:	NONE		
449040	01-22-16				
DRAWN BY:	CHECKED BY:				
KD1	MBF				
AUTHORIZATION:	SHEET:	OF:	SHEETS:	SHEET NO.	
	12	01	12		
DRAWING NO.:					
	CMPT-12				
				12	