

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

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 161,000 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