

**Comprehensive Plan Compliance Review for a  
Proposed 195' Telecommunication Tower Facility  
201 Dunbar Street, Stafford, VA 22554**

Verizon Wireless is requesting Comprehensive Plan Compliance Review and determination of Compliance for a proposed Telecommunication Facility located within the Agricultural / Rural Comprehensive Plan District. The Comprehensive Compliance Review (Review) includes approval for a 195' tall monopole within a fenced 50' by 50' compound to be located on the property at 201 Dunbar Drive, Stafford, VA 22556 (the "Property"). The Review application will demonstrate the compatibility of the proposed Communication Facility with the Comprehensive Plan and the Telecommunication Plan Element of the Comprehensive Plan. The following Exhibits are provided for support of Verizon's Communication Facility Plan Review application:

**I. Exhibits Attached:**

- Exhibit A: Engineered Drawings including Site Plan and Survey
- Exhibit B: Aerial Photograph of Property
- Exhibit C: Photo Simulations
- Exhibit D: Evaluation of Available Co-Location & Government Properties for Tower Siting Within 1 Mile of Proposed Tower
- Exhibit E: Verizon Wireless Coverage Objective Plan
- Exhibit F: Coverage Propagation Maps (Verizon at 700 MHz)
- Exhibit G: FAA Letter of No Hazard to Air Traffic
- Exhibit H: Quantico Marine Base No Interference Correspondence

**II. Introduction:**

The proposed Telecommunication Facility is located within the Agriculture / Rural district and consists of 23.57 acres and is in the Rock Hill Church area of Stafford County, Maryland. Please refer to Exhibit A for detailed information and specifications about the proposed Communication facility. The proposed site is currently a small farming operation that is wooded which has an established tree line with trees over 80 feet in height or higher providing an excellent screening from adjacent properties.

Verizon Wireless requests recommendation that the proposed Communication Facility is in conformance with the Comprehensive Plan and more specifically the Telecommunication Element of the Plan. Below, please find a detailed statement of justification which is supported by documents.

**III. General Comprehensive Plan Standards**

The property where the proposed Communication facility is located within the Agriculture Rural land use district of the Comprehensive Plan where the prime objective is to preserve rural nature of property but still accommodate agricultural use and to not allow additional unplanned residential development (Chapter 3, p. 3-93). Stafford County has established certain goals to preserve such designated land in order to help preserve the rural character. These design criteria for development are recommended for the Agricultural/Rural area:

- Useable open space shall be preserved for agricultural or conservation purposes

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The proposed Communication facility will only occupy approximately 3,600 square feet of a parcel that is 23.5 acres leaving a majority of the parcel available for agriculture and conservation purposes

- Areas containing steep slopes greater than 25%, Resource Protection Areas, and floodplains should be excluded from the developable area  
The proposed Communication facility is avoiding impacting any steep slope
- A building setback of 100 feet should be maintained from the perimeter boundary where located adjacent to existing agricultural uses  
The proposed Communication facility will be maintaining setbacks of 350' and greater
- A building setback of 100 feet to be maintained along existing state-maintained roads to help retain the scenic quality of rural county roads  
The closest main road (Dunbar Drive) is over 760' distance from the proposed Communication facility.
- Wildlife migration corridors to be maintained where identified. Connectivity of open space areas shall be considered to enhance wildlife movement  
For the most part the established forested areas on the property are not impacted by the proposed development
- A large stand of trees shall be maintained to the greatest extent possible on forested tracts of land  
The proposal is taken advantage of the stand of trees located on the property and they will be maintained for screening purposes. There will be minimal tree disturbance.
- The preservation of cultural resources to be considered in accordance with the Cultural Resources Management Plan  
Where applicable Verizon as applicant will preserve cultural resources where identified.
- Cluster subdivisions should be encouraged where permitted  
This design standard does not apply for this project.
- Low Impact Development (LID) practices should be encouraged for stormwater management  
This requirement is acknowledged and will be considered when SWM design is underway

Finally, the proposed Communication Facility will provide economic support to the retention of farm property without seeking residential development. Also, the telecommunication facility will provide emergency and non-emergency wireless broadband service to areas of the County not presently served by broadband and enhanced services. The Comprehensive Plan Objective Goal 3 is the “enhancement of telecommunication infrastructure to promote work from home opportunities”. Verizon believes that the proposed Communication facility is consistent with this goal and with the Comprehensive Plan’s desired objectives.

#### **IV. Telecommunications Plan Standards**

The County adopted a Telecommunications Plan (Plan) as an element of the Comprehensive Plan for implementing their goals for a strong telecommunication infrastructure. The Plan established co-

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location as desirable implementation of building out a telecommunication infrastructure but with the caveats that this does not always achieve maximum coverage and will possibly lead to additional towers to support the infrastructure. The Plan implementation requires that an application for a new Communication facility provide the following for :

1. Location and Siting Policies for new Communication facilities;
2. Overall Coverage Plans;
3. Design Standards;
4. Health and Safety;
5. Broadband Access

## 1. LOCATION AND SITING EVALUATION FOR PROPOSED TOWER (Section 2232 Review)

Verizon always first considers co-location as it is far less expensive to construct than a new tower. But if there are no available sites suitable for co-location than Verizon will proceed towards new tower construction. For this application, Verizon exhausted all available co-location options and ruled out any existing towers and properties within one (1) mile of the proposed tower where Verizon Wireless' service objectives could be met. After ruling out any available co-location opportunities we evaluated Stafford County Government-owned properties for possible tower location. The closest property was the Willomere Park located over 2 miles to the south. This property would not meet the coverage objectives and is also close to an existing Verizon site. Therefore, it was determined that there were no Siting opportunities within 1 mile to meet Verizon service objectives. Please refer to Exhibit D which illustrates the properties identified above.

## 2. OVERALL COVERAGE PLANS

Verizon Wireless Radio Frequency (RF) Engineers identified a need for emergency and non-emergency wireless services in several areas of Stafford County, including the area surrounding the subject Property. A coverage plan was identified in which to locate a viable candidate and is attached as Exhibit E. After Verizon Wireless confirmed that there were no viable structures that could meet planned wireless services and coverage, potential suitable properties were identified. After discounting several properties within the search ring due to lack of interest, it was decided to move further west of the search ring to locate a new candidate. This was not ideal for Verizon RF but it was determined that the property owned by Ms. Charlotte Caton best met the service requirements. Located approximately ½ mile outside of the search ring, a lease agreement with Ms. Caton to lease a portion of the Property for a new tower was finalized in 2019 for constructing a new tower.

Verizon Wireless conducted a detailed radio frequency for constructing a 195' monopole tower. A coverage map of the area to be served by the proposed tower is provide which demonstrates radio frequency propagation model for Verizon Wireless currently and coverage with the proposed tower. The colors indicate lower service levels (Red), medium service levels (Yellow) and highest service levels (Green). As you can see in Exhibit F the existing service level is predominantly medium and low where the proposed tower is located. The service will improve to high levels in the area of the new tower and it will also address capacity concerns with existing Verizon sites within the norther section of the County.

The proposed tower will provide wireless carriers such as Verizon Wireless, AT&T, and others with the ability to provide emergency and non-emergency wireless services, including voice, data, internet, streaming, etc. to this area of Stafford County.

### 3. DESIGN STANDARDS TO ADDRESS VISUAL AND LAND USE IMPACTS

The Telecom Plan establishes design standards to minimize the visual impact of a new tower. Verizon has taken these design standards and incorporated them into the proposed tower design.

The proposed tower is setback from property lines and adjoining dwellings equal to the height of the tower. Furthermore, the tower is situated within the interior of the parent parcel. An aerial photograph of the Property is attached hereto and incorporated herein as Exhibit B demonstrating the location of the tower on the parent parcel. We have also taken advantage of the existing tree lines where there is enough tree cover to provide screening of the tower from most nearby vantage points. The photo-simulations provided as Exhibit C illustrate what the tower would appear after construction is complete. As demonstrated the tower will not be seen in eight out of the nine photos taken in the vicinity of the tower.

Antennas will be designed to be compatible with the principal structure's architectural design, color and scale. The proposed tower will take advantage of the existing tree line for landscaping to visually blend into the surrounding areas. There will be a security fence at the base of any facility.

### 4. HEALTH AND SAFETY ISSUES

Verizon Wireless will operate the proposed Communication facility in accordance with all FCC and FAA requirements meeting FCC established Health and Safety guidelines. The tower is designed to fall upon itself if there ever was a structural failure as a result of a weather or manmade event.

Verizon Wireless was issued a FAA Determination of No Hazard for the proposed tower. In addition, the Quantico Marine Corp Bases Airfield Manager confirmed in a correspondence dated October 24, 2020 that the proposed tower will not interfere with the bases flight operations. This correspondence is attached as Exhibit H.

### 5. BROADBAND ACCESS

Broadband Access will be provided by the proposed Communication facility through wireless services. Broadband Internet Access Services refers to Data Services that provide the capability to transmit data to and receive data from all or substantially all Internet endpoints. Data Services refers collectively to all Verizon Wireless plans that connect a device to the internet, which may include Data Only Plans for USB or fixed modems, netbooks, tablets, and mobile hotspots, as well as Data connectivity included with plans for smartphones, basic phones, smart watches and vehicle hotspots. This information covers all Verizon Wireless services that provide you with internet access through our Data Services over the Verizon Wireless 3G (or Ev-DO), 4G LTE or 5G Ultra Wideband (UWB) network.

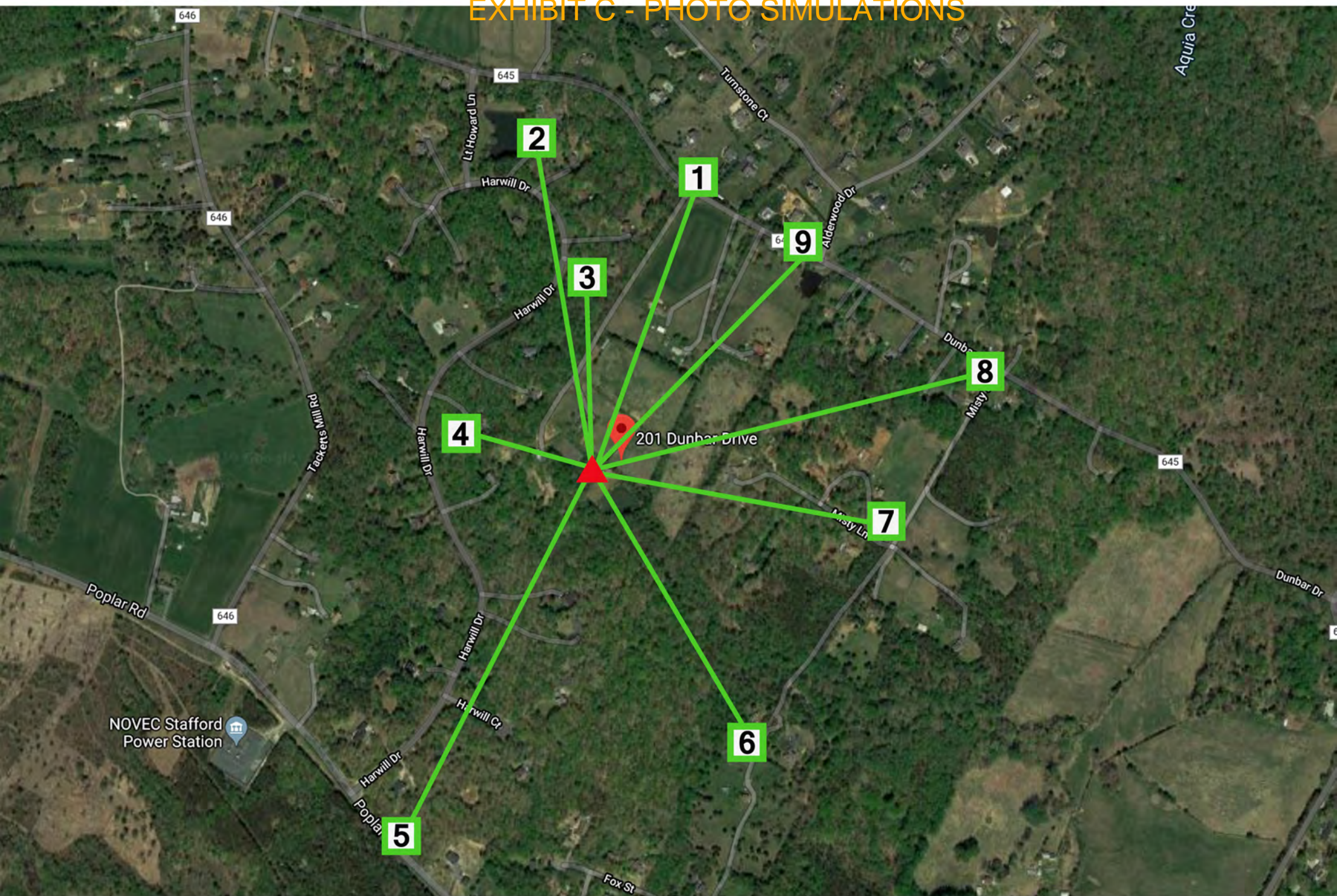
## EXHIBITS

EXHIBIT B - AERIAL





# EXHIBIT C - PHOTO SIMULATIONS



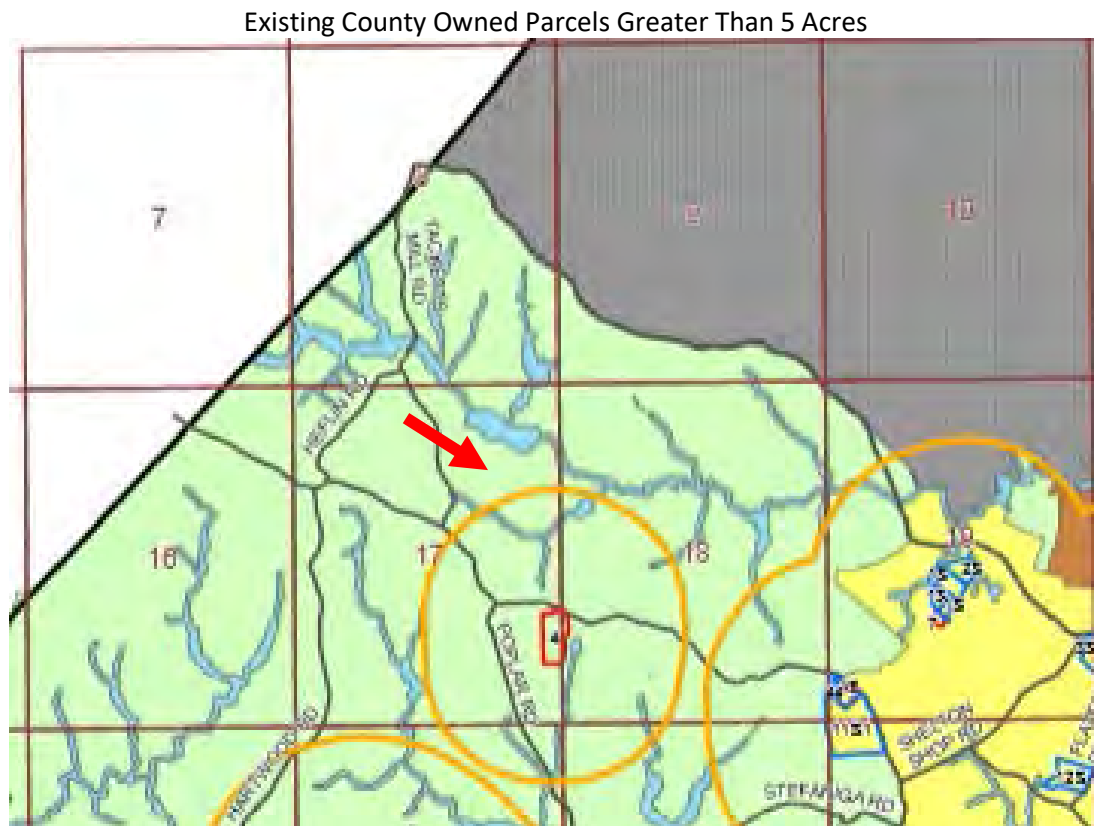
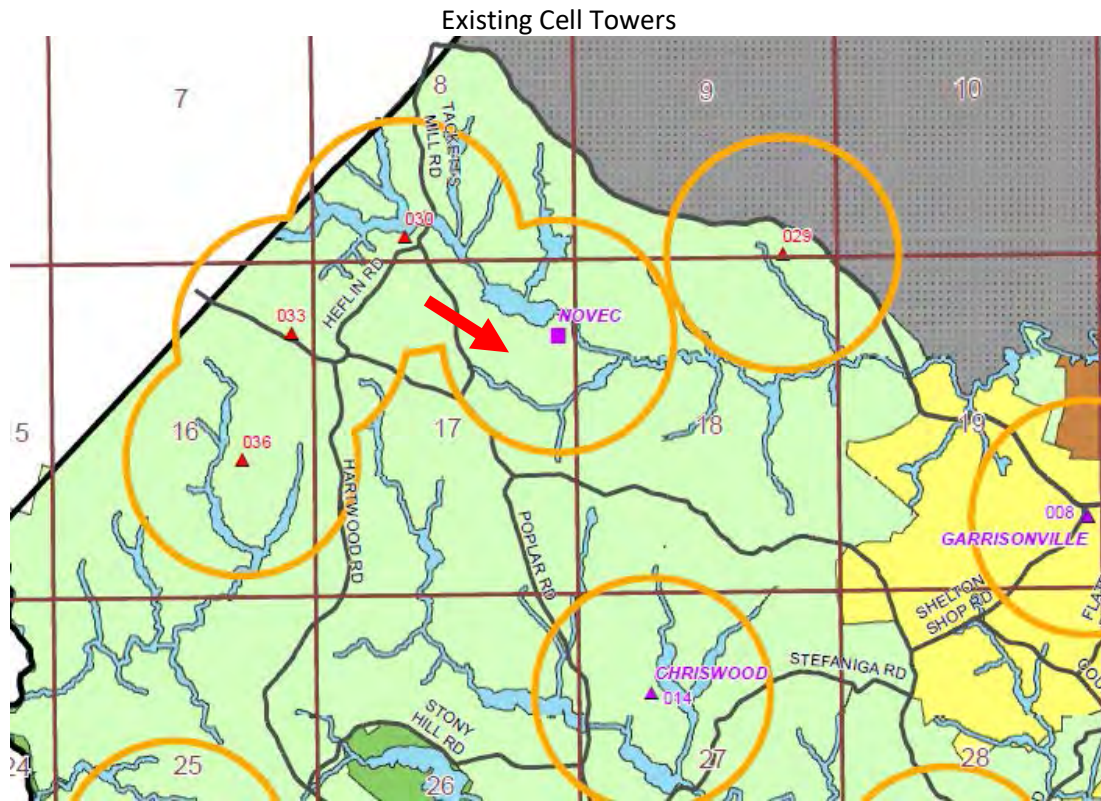
## ROCK HILL CHURCH-A

▲ PROPOSED TOWER LOCATION    □ NUMBERED PHOTO LOCATION



## EXHIBIT D

### EVALUATION OF AVAILABLE CO-LOCATION AND GOVERNMENT RESOURCES FOR TOWER SITING



→ Location of Proposed Tower



# Overall Coverage Plan

SEARCH\_RING: Rock Hill Church

Issued\_By: LUKE

Date\_Issued: 10/27/2016

Latitude: 38.4846

Longitude: -77.5378

ECP\_ID: 112

ECP\_NAME: CHANTILLY1

ZIP: 22556

State: VA

County: Stafford

FIPS\_CODE: 51179

WABA\_CO: BUTE STREET

WBV\_PCS\_SPECTRUM: C3,C4,C5

AWS\_FREQUENCY: B,C,D

RRES\_MACRO: DAVID REINAUER

RRES\_MICRO:

RRFE: NAOD DESTA

RREM: JAMES GOLDEN

Equipment\_Type: MACRO

Small\_Cell\_Y\_or\_N: N

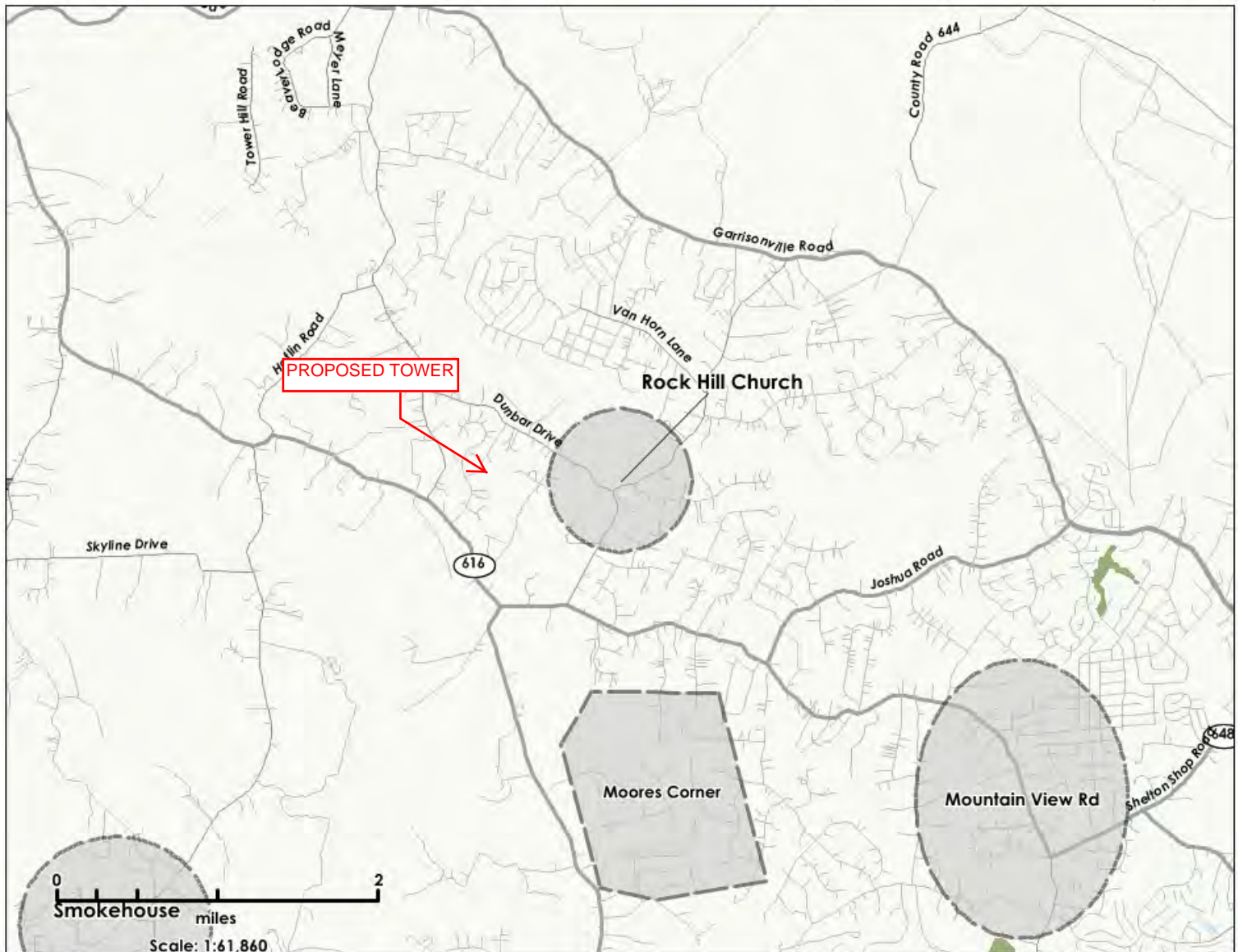
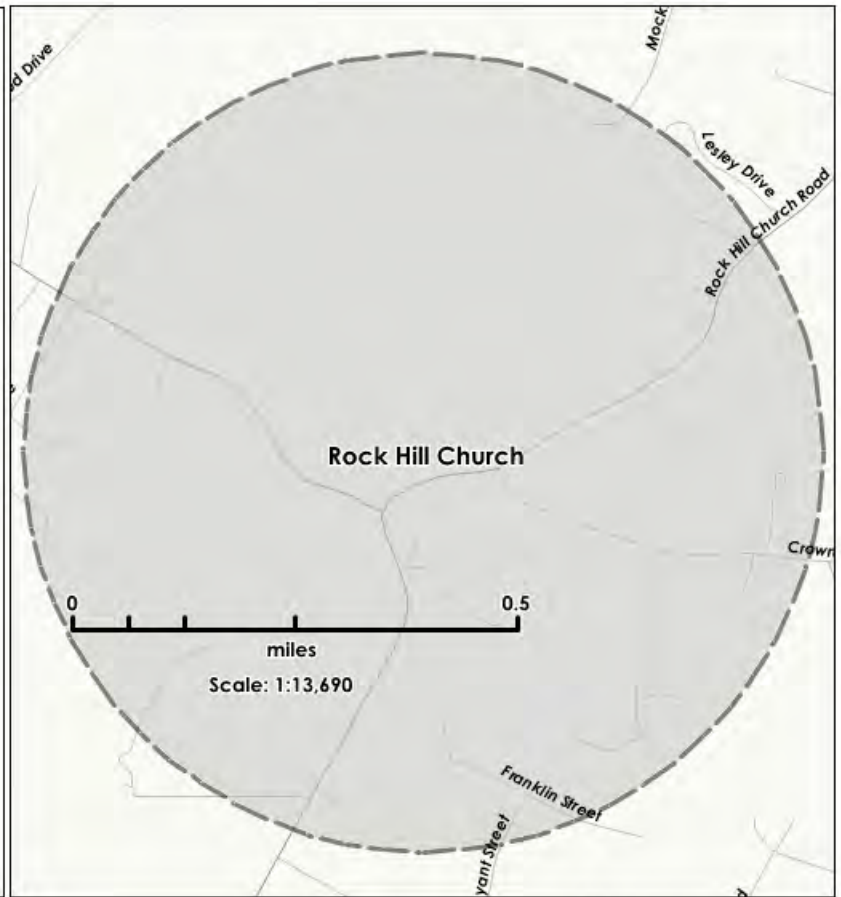
Indoor\_or\_Outdoor\_Coverage: Outdoor

Number\_Of\_Antennas: 6

Amsl:

Status:

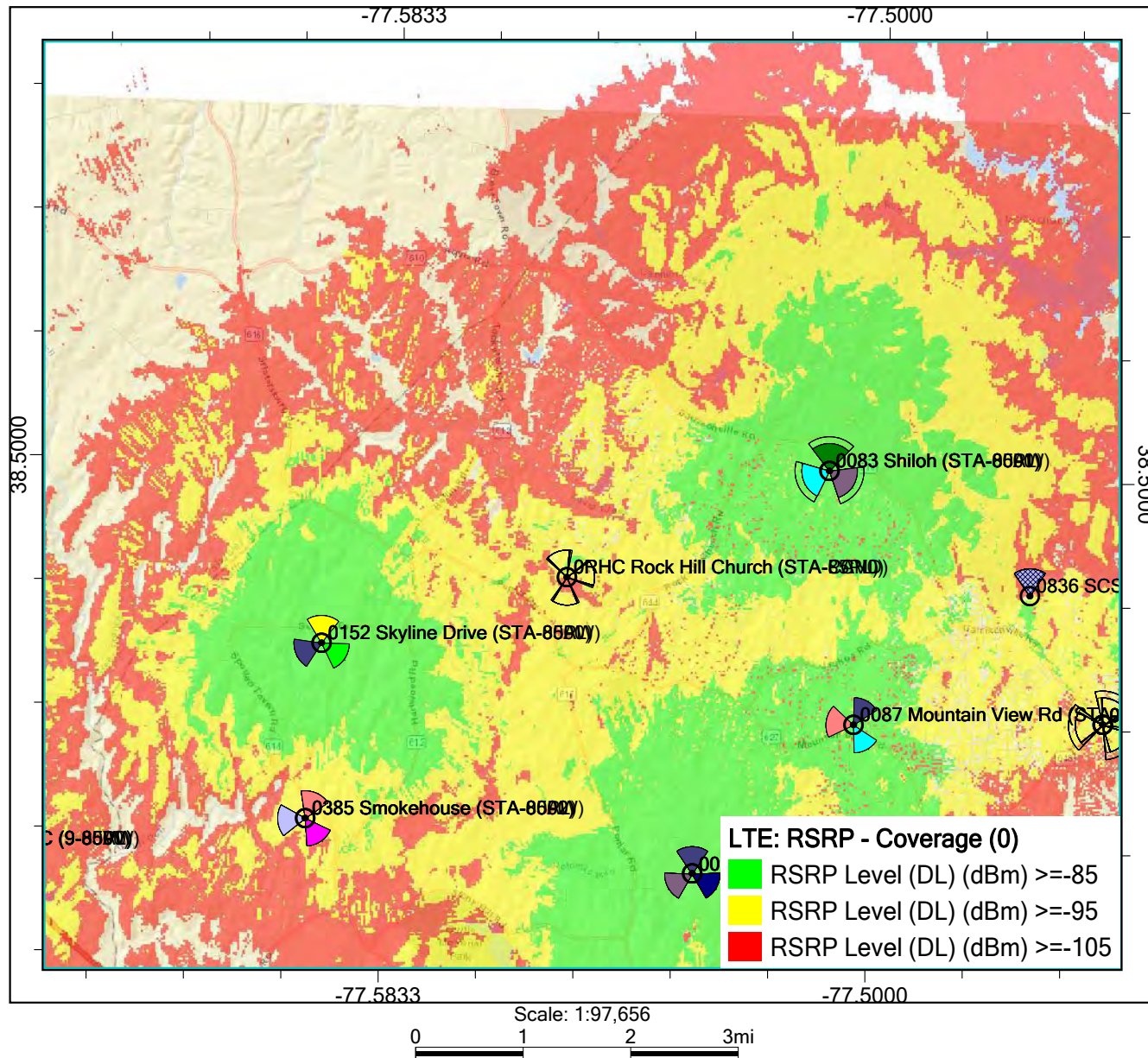
Structure\_Height: 195



# EXHIBIT F



## LTE COVERAGE WITHOUT ROCK HILL CHURCH







Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
10101 Hillwood Parkway  
Fort Worth, TX 76177

Aeronautical Study No.  
2019-AEA-12034-OE

Issued Date: 11/21/2019

Network Regulatory  
Cellco Partnership  
5055 North Point Pkwy  
NP2NE Network Engineering  
Alpharetta, GA 30022

**\*\* DETERMINATION OF NO HAZARD TO AIR NAVIGATION \*\***

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Monopole Rock Hill Church - A (2486476)
Location:	Stafford, VA
Latitude:	38-29-07.80N NAD 83
Longitude:	77-33-10.27W
Heights:	315 feet site elevation (SE) 197 feet above ground level (AGL) 512 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 L Change 2.

This determination expires on 05/21/2021 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

**NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO**



# EXHIBIT H

**From:** [Moore CIV Virgil L](#)  
**To:** [Andrew Martin](#)  
**Subject:** RE: Proposed Verizon Wireless Tower - 201 Dunbar Drive Stafford VA - Potential Impact due to 2014 MCB Quantico Joint Land Use Study (Rock Hill Church)  
**Date:** Thursday, October 24, 2019 2:06:10 PM

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Mr. Martin,

Thanks for the info.

Per our Air Traffic Control Terminal Procedures Specialist, this tower will not impact our VFR pattern and should not affect our IFR procedures.

Have you filed an FAA obstruction evaluation request?

V/R,

Virgil

Virgil L. Moore  
MCAF Quantico Airfield Manager  
DSN 278-1449  
Comm (703) 784-1449  
Cell (540) 840-7630

-----Original Message-----

From: Andrew Martin [<mailto:Andrew.Martin@smartlinkllc.com>]  
Sent: Thursday, October 24, 2019 7:42 AM  
To: Moore CIV Virgil L <[virgil.moore@usmc.mil](mailto:virgil.moore@usmc.mil)>  
Subject: [Non-DoD Source] Proposed Verizon Wireless Tower - 201 Dunbar Drive Stafford VA - Potential Impact due to 2014 MCB Quantico Joint Land Use Study (Rock Hill Church)

Mr. Moore, based on my discussions with the County's Planning office our proposed tower height of 195' could be impacted by the findings of the 2014 MCB Quantico Joint Land Use Study. Verizon is preparing a Stafford County Conditional Use Permit application for a cell tower site at the referenced property. But I wanted to see first if the MCB could provide a determination on the potential impact of our proposed tower. The coordinates of our proposed tower is: 38.4855 / - 77.552853. I have also attached our preliminary site plan and 1A survey information for your reference.

Please advise of any impact of the Joint Base Study on Verizon's proposed tower.

Any questions please advise.

Regards,

Andrew Martin | Real Estate Specialist

Smartlink o/b/o Verizon Wireless

(m) 410.474.9081

1362 Mellon Road, Suite 140

Hanover, MD 21076

(o) 410-582-8043

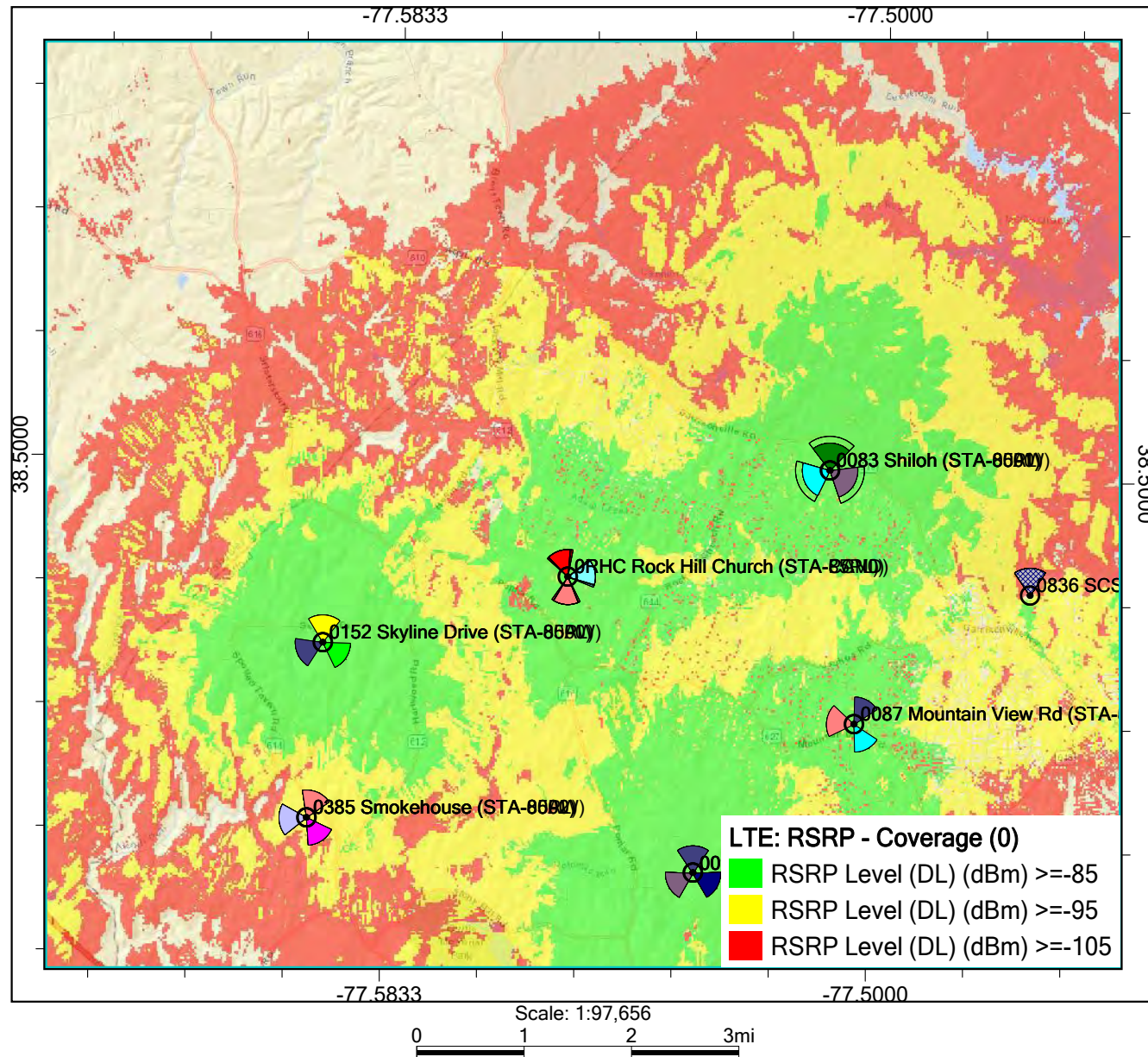
(f) 443.221.2962

[https://linkprotect.cudasvc.com/url?\\_a=https%3a%2f%2fsmartlinkllc.com&c=E.1.YhXAubrDMASeSOOpfpIMnWHeruszNCac5xfT8A9mChG69VRwrIT0\\_BaeZisPAh00j6BOXuRw3YtcXpynSYBXTiL1AdWQsJKg-5N2oxGwa\\_uxDJaH0JdRvHYic.&typo=1](https://linkprotect.cudasvc.com/url?_a=https%3a%2f%2fsmartlinkllc.com&c=E.1.YhXAubrDMASeSOOpfpIMnWHeruszNCac5xfT8A9mChG69VRwrIT0_BaeZisPAh00j6BOXuRw3YtcXpynSYBXTiL1AdWQsJKg-5N2oxGwa_uxDJaH0JdRvHYic.&typo=1) <[https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fbit.ly%2fsmartlink-web&c=E.1.mXoPG96AQIU\\_D4b7X7QBmuieyoP55o-rhnAiX\\_uczjsb9mXU9jV0fE7sUXxmEj4boWn7ffHXsX7P9HmnSaBSs8jbp4d\\_iU1QE8wNfuDr7HilQzakFzd37PWE.&typo=1](https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fbit.ly%2fsmartlink-web&c=E.1.mXoPG96AQIU_D4b7X7QBmuieyoP55o-rhnAiX_uczjsb9mXU9jV0fE7sUXxmEj4boWn7ffHXsX7P9HmnSaBSs8jbp4d_iU1QE8wNfuDr7HilQzakFzd37PWE.&typo=1)>



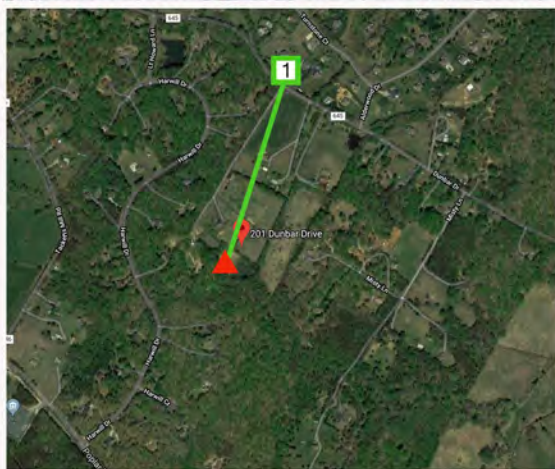
## EXHIBIT F

### LTE COVERAGE WITH ROCK HILL CHURCH





Proposed Verizon  
Wireless antennas  
on new 195' monopole



## ROCK HILL CHURCH- A

**PHOTO 1:** VIEW FROM 201 DUMBAR DR. (0.33 MI. NORTH)