

MILESTONE TOWERS MICKIE GORDON PARK
Proposed Telecommunications Facility
23229 Carters Farm Lane, Middleburg
Milestone Tower Limited Partnership IV d/b/a Milestone Towers
Commission Permit Application (CMPT-2021-0014)
Special Exception Application (SPEX-2021-0053)
Telecommunications Application (TELE-2021-0012)

STATEMENT OF JUSTIFICATION

INTRODUCTION

Milestone Tower Limited Partnership IV (hereinafter “Milestone,” or “Applicant”) respectfully requests review and approval of a Commission Permit and a Special Exception application to construct a one hundred fifty (150) foot tall monopole telecommunications facility (150 feet tall with a 2-foot lightning rod at the top of pole for a total of 152 feet) located at 23229 Carters Farm Lane, Middleburg, just north of Route 50/John Mosby Highway. The parcel is identified as GPIN # 503404063000 (hereinafter the “Property”). The monopole and a related equipment compound will accommodate the telecommunications provider AT&T and up to three other future telecommunication providers at the site. AT&T’s antennas will be at the top of the monopole at a centerline height of 145 feet. Space for three other carriers on the monopole will be available at center elevations of 135 feet, 125 feet, and 115 feet.

The monopole will be located in a 50-foot by 50-foot fenced area to the northwest of an existing baseball field facility. Access to the site will be via a proposed 10-foot-wide gravel access drive that will exit out of the existing gravel parking lot adjacent to the baseball field.

The compound area will be in 2,500 sq ft leased area. It will have space to accommodate up to 4 telecommunication providers, including the initial provider, AT&T. The total compound area will be surrounded by an 8-foot-high chain link fence with slats as well as a 25’ wide planted landscape “Type C” buffer yard on the east and south sides.

Details of the proposed facility area are shown on the Zoning Drawings prepared by Entrex Communication Services and dated October 13, 2021, submitted with the application package and are further described in this Statement of Justification. The proposed telecommunications monopole and structure are subject to the standards of Section 5-618 of the Loudoun County Zoning Ordinance (hereinafter “Zoning Ordinance”). As a permitted use via Special Exception (Section 5-618(B)(2)) in the AR-2 zone, the proposed telecommunications monopole and structure will comply with the standards set forth in Section 5-618(B)(3) and (B)(4) of the Zoning Ordinance as well as the general exception standards of Section 6-1309 of the Zoning Ordinance.

BACKGROUND

The Property is owned by the Loudoun County School Board and has a physical address of 23229 Carters Farm Lane in the Blue Ridge Election District. The Park property has an existing gravel entrance road off of Carters Farm Lane. Vehicles going to the telecommunications site will use this entrance to obtain access to the proposed facility.

The Park property is zoned AR-2 and consists of athletic fields, a picnic pavilion, natural wooded areas, and open space. A gravel parking area exists adjacent to the baseball field.

The immediate surrounding adjacent area is characterized by both rural and rural-residential land uses.

The Applicant's representatives met with County staff during a Pre-Application Conference on March 22, 2021 (PRAP-2021-0024). As discussed at that meeting, the proposed use requires both a Commission Permit (CMPT) and approval of a Special Exception (SPEX). The approval of the Special Exception per §2-1702, §2-1502 and §3-103 of the Zoning Ordinance, and the provisions of §5-618 B (2), (3) and (4).

In addition to coordinating with the Blue Ridge and Middleburg offices, Milestone has done extensive outreach to the community to include them in the process. To this point, Milestone has presented the project at a Loudoun County Public School-sponsored virtual informational meeting, launched a project informational website (<http://www.mickiegordonparkwireless.com/>), hosted a second virtual community meeting, coordinated two balloon fly events, and solicited post-meeting feedback from community meeting participants via two online polls.

The outreach timeline is as follows:

- 03/22 – Pre-Application Meeting (PRAP-2021-0024) with County
- 04/12 – LCPS Informational Meeting
- 05/04 – LCPS School Board Action
- 06/08 – Milestone call with Blue Ridge-Middleburg offices to discuss outreach
- 08/14 - Milestone Balloon Fly
- 08/19 - Milestone Balloon Fly 2
- 08/20 - Website Updated with Photosimulations and Location Poll
- 08/25 - Community Meeting
- 08/31 - Location Poll Closed
 - Link to archived poll: https://docs.google.com/forms/d/e/1FAIpQLSfnwJyPXymS5-m4xCFpdbeCZv0Xov_IIEqQC0LKeySU5P2V8w/viewanalytics
- 09/03 - Website Updated with Final Location, Paint Color Photosims, and Paint Color Poll
- 09/17 - Paint Color Poll Closed, Website Updated with Final Color
 - Link to archived poll: <https://docs.google.com/forms/d/e/1FAIpQLSdhaXC9ktx9v1HzNLXcVfjvKdTjtS3XITw82c15XvaywLn-8g/vhttp://www.mickiegordonparkwireless.com/iewanalytics>

Key adjustments made based on feedback received during outreach:

- Reduced overall structure height from 185' to 150'
- Relocated the tower facility to the northwest corner of the Park, thereby increasing distance from closest residences and main roads.
- Offered a two-toned painting scheme to better match surrounding trees.

REASON FOR REQUEST

The proposed telecommunications facility is necessary for AT&T to provide and improve coverage around and near the intersection of Carters Farm Lane and Route 50 and to the east of Middleburg. The proposed site will fill a coverage gap and enhance coverage of neighboring residential communities. In addition, growing wireless traffic demands in the area limit capacity of neighboring, existing AT&T sites to deliver quality and reliable service. The proposed site will also relieve some existing traffic so that service does not degrade in the communities they serve.

As of October 2021, Milestone has also received interest from T-Mobile. T-Mobile intends to locate telecommunications antennas and equipment at the 135' antenna centerline. Analysis of the terrain profile

indicated that 135' is the bare minimum height required for T-Mobile to meet their propagation objectives; lower heights would result in degraded performance.

The proposed site will resolve the need for adequate coverage in this area of Loudoun County and will also ensure adequate overlapping coverage between and among existing AT&T sites in the area. Ultimately, the new proposed site will allow residents and commuters to experience better quality service coverage.

Propagation maps are included with the Application Package and show the existing AT&T coverage in the general area and the improvement that will be realized with construction of the proposed site. As more specifically shown on the propagation maps, the proposed site will fill the existing void in coverage not provided adequately by neighboring sites and [] when the new site is on-line.

COMPLIANCE WITH §5-618

Telecommunications monopolies are permissible subject to approval of a Special Exception pursuant to §5-618(B)(2) and subject to the performance standards in §5-618(B)(3) and 5-618(B)(4).

§5-618(B) (3) Monopolies, General Performance Criteria.

All telecommunications monopolies, whether permitted by right or permissible with the approval of a special exception application, shall be subject to the following criteria:

(a) The proposed telecommunications monopole shall be compatible with development in the vicinity with regards to the setting, color, lighting, topography, materials and architecture. In addition, the facility shall be located in the interior of the property and areas of existing vegetation, if applicable, shall be used to screen the facility.

The proposed facility will be located on a large public park property consisting of 99.89 acres and with ample setback distances. The proposed monopole will be designed to blend with the existing tall trees on and surrounding the Park property. The structure is not located in the interior of the park property but is located amongst existing heavy vegetation and trees on the north and west sides of the park property. The facility has been intentionally sited as far possible from Route 50 in order to reduce visibility from the road as well as Middleburg. All equipment associated with the facility will be in a compound area enclosed and screened by an 8' tall chain link fence and a 25-foot-wide landscape planting area to the east and south.

(b) New telecommunications monopolies shall be designed to accommodate at least three (3) providers, unless: (i) Doing so would create an unnecessary visual impact on the surrounding area; or (ii) No additional need is anticipated for any other potential user in the vicinity; or (iii) There is some valid economic, technological, or physical justification as to why co-location is not possible. The Applicant shall identify the conditions under which future co-location by other service providers is permitted.

The proposed structure and compound area are designed to accommodate a total of 4 telecommunication carriers including the initial carrier, AT&T.

(c) The height of such monopole, including antennas, shall not exceed 199 feet, as measured from the natural ground elevation.

The proposed installation will not exceed 199'. The proposed monopole measures 155 feet AGL and will have a 2-foot tall lightning rod mounted to the top of the pole. The overall height of the structure is the lowest extent possible to meet AT&T's coverage objectives and accommodate a total of 4 carriers.

(d) Satellite and microwave dishes attached to monopoles shall not exceed two (2) feet in diameter.

No satellite or microwave dishes are proposed in this application.

(e) Except as provided in Section 5-618(B)(3)(o) and Section 5-618(B)(4)(d), telecommunications monopoles shall not be located any closer than one (1) foot for every five (5) feet in height to any property line. Structures and buildings may be constructed within the setback areas of the monopole, provided other zoning standards are met.

The proposed 150-foot tall monopole exceeds the 5:1 setback requirement of 31 feet. The monopole is 84.1 feet from the northeastern property line. It is 775.9 feet from the northwestern property line, 413.1 feet from the southwestern property line, and 1885.8 feet from the southeastern property line along Carters Farm Lane.

(f) The related unmanned equipment structure(s) shall not contain more than 500 square feet of total gross floor area per telecommunications provider on each site. Structures shall not exceed 12 feet in height.

The equipment structures and cabinets proposed will not exceed 500 square feet nor 12 feet in height.

(g) Unless otherwise required by the Federal Communications Commission or the Federal Aviation Administration, monopoles shall blend with the background.

The proposed monopole will be constructed of galvanized steel and be both grey and brown in color. The proposed monopole, panel antennas, and related equipment cabinets will all be within the size and height limitations specified in the Ordinance. The antennas will be painted to match the color of the pole.

(h) No signals or lights or illumination shall be permitted on a monopole, unless required by the Federal Communications Commission, the Federal Aviation Administration, State or Federal authorities, or the County.

No signals, lights, or illumination will be utilized at the proposed facility unless required by the FCC, FAA, State or Federal Authorities, or Loudoun County.

(i) No commercial advertising or signs shall be allowed on a monopole.

No commercial signs or advertising are proposed. Milestone will comply with this requirement.

(j) A commission permit shall be required.

A Commission Permit for the facility is being applied for and processed simultaneously with this Special Exception application.

(k) No monopole shall be located within a County designated historic district.

The proposed facility is not located within a County designated historic district.

(l) No monopole shall be located within a PD-H, or PD-RV zoning district except as provided in Section 5-618(B)(1)(a) and Section 5-618(B)(2)(d).

The proposed facility is not located within a PD-H or PD-RV zoning district. The subject property is zoned AR-2.

(m) All unused equipment and facilities from a commercial public telecommunications site shall be removed within 90 days of cessation of commercial public telecommunication use and the site shall be restored as closely as possible to its original condition.

Should the equipment or facilities at the site not be used, they be removed within 90 days of cessation and the site restored as closely as possible to its original condition prior to approval of this application.

(n) Applicants for any commercial public telecommunications facility shall demonstrate that they have complied with applicable regulations of the FCC and the FAA. A finding from the FAA that the proposed facility is not a hazard or obstruction to aviation is necessary prior to the issuance of a zoning permit. If a proposed telecommunications facility is higher than 199 feet or within five (5) miles of the property boundary of either Dulles or Leesburg Airports, the Applicant shall provide verification that: 1) the appropriate airport authority (Metropolitan Washington Airports Authority or the Town of Leesburg) has been notified in writing; and 2) the FAA has determined that the proposed facility is neither a hazard nor an obstruction to aviation.

Milestone will comply with all applicable regulations of the FCC and the FAA. The subject parcel is not located within 5 miles of either Dulles or Leesburg Airports. Supporting compliance documentation will be provided as part of the Application review process.

(o) When locating on a Loudoun County or Loudoun County Sanitation Authority site or fire and/or rescue company site: 1) the telecommunications equipment shall not interfere with the existing telecommunications equipment of the primary use; and 2) the setback provisions of Section 5-618(B)(3)(e) shall not apply. In addition, the landscaping/buffering provisions of the Ordinance may be reduced or waived if the site has been developed in accordance with Section 5-1409(G).

The proposed facility will be located on a Loudoun County site. The telecommunications equipment will not interfere with any existing uses of the park property. Additionally, setback provisions will be met.

(p) Applicants proposing a new telecommunications monopole within one (1) mile of a County designated historic district or a Virginia Byway shall submit a minimum of three (3) visual simulations and written justification as to why the monopole could not be sited elsewhere. This requirement shall also be applied if a telecommunications monopole is proposed on a property listed on the National Register of Historic Places.

The site is located within one mile of John Mosby Highway/Rt. 50, a noted Virginia Byway. Milestone submits, as a part of this application package, photosimulations from sixteen (16) vantage points that demonstrate the minimal visual impact the proposal will have in the area and along the Byway.

*A written justification as to why the monopole could not be sited elsewhere is provided below under the "Monopole: Additional Submission Requirements" section (b) of this Statement of Justification and is supported by the RF Justification and the alternative sites analysis. **It should also be noted that the applicant has received a "No Adverse Effect" Determination from the VA SHPO.***

(q) Telecommunications monopoles shall not be located along ridge lines, but downslope from the top of ridge lines, to protect views of the Catoctin, Bull Run, Hogback, Short Hill, and Blue Ridge Mountains.

The proposed facility is not located along a ridge line and will not negatively impact such views.

(r) Applicants shall submit documentation, in written and graphic form, regarding the service area to be provided by the proposed telecommunications monopole.

A written discussion regarding the service area to be provided is included above in this Statement of Justification under Reason for Request, page 2. RF propagation maps reflecting the service area are also included in the application package. The proposed facility is necessary to cover gaps in service near Route 50 and Carters Farm Lane and to relieve wireless service provided by existing neighboring AT&T sites. As more specifically shown on the propagation maps submitted as part of this Application, AT&T needs to improve and provide additional coverage in this area.

5-618(B) (4) Monopoles, Additional Submission Requirements. The following additional information shall be submitted by applicants for monopoles required to be approved by special exception.

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

The application package includes photo simulations taken from 16 vantage points reflecting existing site conditions as well as the proposal when completed. As the photo simulations demonstrate, the proposed facility is well removed from residential communities and surrounding land uses and will not have a negative visual impact. The proposed structure is being designed to blend in with the surrounding tall trees by utilizing both grey and brown coloring schematics for the pole and appurtenances.

The proposed facility is removed from residential uses and roads in the area. The closest off-site residence and road to the monopole's proposed location are 1,375.9' and 1,899.4' away, respectively.

(b) Except for areas where permitted by right, an applicant for a new commercial public telecommunication monopole shall demonstrate that location on an existing telecommunications facility or structure greater than 40 feet in height is not feasible. The applicant shall evaluate telecommunications facilities and structures greater than 40 feet in height within a one (1) mile radius of the proposed facility within the Eastern Loudoun Urban Growth Area. Elsewhere in the County, the applicant shall evaluate these locations within a two (2) mile radius of the proposed facility. Technological, physical, and economic constraints may be considered in determining infeasibility. Co-location may be determined to be infeasible in the following situations:

- (i) Planned equipment would exceed the structural capacity of existing and approved telecommunications facilities, considering existing planned use of those facilities, and such facilities cannot be reinforced to accommodate planned or equivalent equipment at a reasonable cost;
- (ii) Planned equipment will cause interference with other existing or planned equipment for that telecommunications facility, and that interference cannot be prevented at a reasonable cost;
- (iii) Existing or approved telecommunications facilities do not have space on which planned equipment can be placed so as to provide adequate service; and
- (iv) Existing and approved telecommunications facilities will not provide adequate signal coverage.

The Applicant and AT&T evaluated existing sites within 2 miles of the proposed location for the new monopole. The sites were determined by AT&T RF engineers to be unacceptable as an alternative location to the proposed site because of several primary reasons: the site is outside AT&T's desired coverage area; the site is too close to an existing on-air AT&T site; the existing structure does not have sufficient height to provide optimal coverage for AT&T; or AT&T is already located at the existing the site to provide for

wireless coverage to this area of the County. A map showing the alternative sites considered and an accompanying spreadsheet providing address, type of structure, and reasons the site is not an acceptable alternative to the Mickie Gordon Park site are included with the application package.

(c) In addition to those entitled to notice under the provisions of Section 6-600 of this Ordinance, all owner(s), or their agent(s), of all properties abutting or immediately and diagonally across the street or road from those properties whose owners are entitled to notice under Section 6-600, shall be provided with the same written notice. The applicant is also encouraged to meet with community and homeowner's association groups in the area.

Notice will be provided as required under §6-600 and §5-618(B)(4)(c). Additionally, the Applicant has already met with numerous community stakeholders to solicit feedback and dialogue.

(d) Telecommunications monopoles permissible by special exception pursuant to Section 5-618(B)(2)(d) shall not be subject to the lot requirements, building requirements, and open space requirements, if applicable, of the zoning district in which they are located.

The subject property is zoned AR-2. It is not being located in the right of way of a private toll road. The lot requirements, building requirements and open space requirements have been met in accordance with §5-618 and §2-1500.

6-1309 Issues for Consideration. In considering a minor special exception or special exception application, the following factors shall be given reasonable consideration. The applicant shall address all the following in its statement of justification and plat unless not applicable, in addition to any other standards imposed by this Ordinance:

- (1) Whether the proposed minor special exception or special exception is consistent with the Comprehensive Plan.

The proposed facility supports the County's effort to deliver a community with a high quality of life and an attractive business environment. The provision of improved wireless telecommunications services fosters an environment that is conducive to growth, competitiveness and expansion of business.

The Milestone facility has been sited and designed in accordance with the Strategic Land Use Plan for Telecommunications Facilities which recognizes the positive net fiscal impact such facilities offer the community and strives to meet the needs of the industry while effectively preventing harmful effects on the community.

- (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.

No noise, light, glare, odor or other emissions to be generated by use.

- (3) Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and on adjacent parcels.

The proposed facility is compatible with the Mickie Gordon Memorial Park site and the surrounding neighborhoods. Visual impacts on these areas are minimal primarily due to distance, intervening trees and vegetation in the area, and the facility's proximity to tall trees on the site. The adjacent and nearby parcels

are primarily residential in nature and use, thereby allowing the passive nature of a telecommunications facility to not encumber existing neighboring uses. Specifically, the large wooded areas on the park site to the north and west, and tree lines to the south of the proposed facility's location serve to interrupt views and screen the facility from most residences and parcels.

(4) Whether the proposed special exception or minor 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 proposed facility will have no adverse effect on the wildlife, vegetation, wetlands, water quality, air quality, topographic, scenic, archaeological or historic features, and agricultural and forestal lands. The site will have minimal impact on this area as demonstrated by the photo-simulations included in the application package.

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

As noted, there is a substantial need for improvement of capacity and coverage by AT&T in the immediate area. The level of service without and with the proposed new facility is shown on the propagation maps.

(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 proposed facility will be located off an existing parking area and is accessed from an existing roadway. Public utilities are available to the site for electrical hook-ups. The facility will not require water, sewer or other services.

RELATIONSHIP OF THE PROPOSAL TO THE COMPREHENSIVE PLAN

The Strategic Land Use Plan for Telecommunications Facilities was adopted as part of Loudoun County's Comprehensive Plan on November 6, 1996. The purpose of this policy document includes "... ensuring appropriate siting and design, and mitigating impacts of telecommunication facilities." The following is a discussion of the consistency of the proposed expanded monopole facilities with the Location, Design, Safety and Health and Implementation policies detailed in the General Plan.

Location:

The County's Plan for Telecommunications Facilities states that "where it is not feasible to locate on an existing structure, new towers or monopoles preferably should preferably be located a) in planned and zoned industrial and employment areas, b) within overhead utility line rights of way where structures exceed 80 feet in height already exist, and c) on public sites or volunteer fire and rescue company properties where such facilities mitigate adverse impacts on the character and use of the public or public safety site." As described above in this Statement of Justification, the Applicant and AT&T have evaluated collocation on other existing structures in the area and have determined that a suitable location that meets AT&T's coverage objectives is not available. The selected site for a new monopole is a Public Park consisting of 99.89 acres, adjacent or near to land areas that are developed with, zoned and planned for employment areas, businesses, and residences. The location of the site, its large land area and heavily wooded areas on the property and trees and vegetation in the environs serve to mitigate any adverse impacts on the public site and the surrounding area. The proposed monopole and compound area are designed to encourage collocation in compliance with the County's Telecommunication Policies, and the facility will

accommodate a minimum of four telecommunication carriers including the initial provider, AT&T. The site is not located at the interior of the property but in the northwestern corner of the property. Most of the Park's land area is to the south of the facility's location.

The proposed telecommunications facility will not emit noise, light, or odors and will not have any discernable traffic impact. The facility will have no impact on air quality, water quality, radiation exposure, light pollution, noise pollution, traffic congestion or circulation. The proposed telecommunications facility will be consistent with all applicable requirements, including building and fire code. The proposed telecommunications facility will not present safety or fire hazards. AT&T and all future carriers will visit the site approximately once per month by a technician for regular maintenance. All carriers, and future carriers, co-locating on the monopole are licensed by the FCC, and each operates its equipment in full compliance with FCC rules and regulations.

Design:

Milestone has carefully considered the design standards to address visual and land use impacts of the proposed facility. Such consideration resulted in the selection of the large public park property which is well buffered from residential areas and provides an opportunity to construct the facility in an area of the Park well removed from existing uses. The monopole is designed to be the minimum height possible to meet AT&T's coverage objectives and allow for collocation by other telecommunication carriers.

The facility will blend with the natural and built environment of the surrounding area. The 150-foot-tall structure will not be lighted, will be grey and brown in color and located among other tall trees. Antennas and platforms mounted on the structure will be of a neutral color to blend with the monopole. The attached Plans show the design of the proposed facility and its relation to the Park Property.

The equipment compound area is surrounded by an eight (8) foot chain link security fence and a 25-foot-wide landscape planting area on two sides (northern and western sides are shrouded by existing trees) as shown on the Plans. The proposed equipment cabinets within the compound area will be completely screened by the fence and landscape area. The facility will not have physical or technological interference with the existing or planned function of the Park facility.

Safety and Health:

The Plan provides that Applicants shall demonstrate that they have complied with regulations of the FCC and the FAA. The site is not located within five (5) miles of Dulles Airport and the Applicant will provide that the FAA has determined that the proposed facility is neither a hazard nor an obstruction to aviation. The Applicant agrees to remove all unused structures and facilities from the monopole within 90 days of ceasing its use or expiration of its lease, whichever occurs first, and will return the site to the original condition as it existed prior to approval of this application.

Zoning Ordinance:

The telecommunication facility is subject to approval of a special exception pursuant to Section 5-618(B)(2)(a) and subject to performance standards listed in Sections 5-618(B)(3) and 5-618(B)(4). Compliance with each of these performance standards was discussed in detail above.

RELATIONSHIP OF THE PROPOSAL TO THE VIRGINIA CODE, AGRICULTURAL AND FORESTAL DISTRICTS

In Chapter 43 of the *Code of Virginia, Section 15.2-4301. Declaration of policy findings and purpose* states,

It is the policy of the Commonwealth to conserve and protect and to encourage the development and improvement of the Commonwealth's agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the Commonwealth to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces for clean air sheds, watershed protection, wildlife habitat, as well as for aesthetic purposes. It is the purpose of this chapter to provide a means for a mutual undertaking by landowners and localities to protect and enhance agricultural and forestal land as a viable segment of the Commonwealth's economy and as an economic and environmental resource of major importance.

It was suggested during Milestone's pre-application meeting that the Applicant consider how the proposal meets the purposes of these districts due to adjacent parcels being part of Agricultural and Forestal Districts. It is the Applicant's contention that the proposed facility is compatible with the Mickie Gordon Memorial Park site and the surrounding neighborhoods. Visual impacts on these areas are minimal primarily due to distance, intervening trees and vegetation in the area, and the facility's proximity to tall trees on the site. The adjacent and nearby parcels are primarily residential in nature and use, thereby allowing the passive nature of a telecommunications facility to not encumber existing neighboring uses. Specifically, the large wooded areas on the park site to the north and west, and tree lines to the south of the proposed facility's location serve to interrupt views and screen the facility from most residences and parcels. The proposal in no way takes away from the viability of these Districts and will allow the Districts to continue to be used as an *economic and environmental resource of major importance*.

CONCLUSION

The proposal described above is consistent with and furthers the policies and standards for the placement of commercial public telecommunications facilities in the applicable zoning district as set forth in the Loudoun County Comprehensive Plan and Zoning Ordinance. The Applicant's proposed facility will comply with all applicable development and building codes and the proposed uses will conform to all ordinances, regulations, adopted standards, and conditions. Accordingly, Milestone respectfully requests approval of this Application for a Commission Permit and Special Exception.