



MONTGOMERY COUNTY PLANNING DEPARTMENT

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MCPB

Item # 3

10/14/10

MEMORANDUM

TO: Montgomery County Planning Board

VIA: John Carter, Chief, *JAC*
Urban Design and Historic Preservation Division

FROM: Mary Beth O'Quinn, *mbog*
Planner Coordinator (301.495.1322)
Urban Design and Historic Preservation Division

SUBJECT: Mandatory Referral No. 10716-IMF-1
Brentwood – Bretton Woods Country Club–Telecommunications Monopole
15700 River Road, Germantown, MD
RC Zone, Potomac Subregion Master Plan

The International Monetary Fund (IMF) has applied under Mandatory Referral to construct a telecommunications facility on its property, the Bretton Woods Recreation Club (BWRC), located at 15700 River Road, Germantown, MD. The telecommunications facility comprises a 155-foot tall, unmanned wireless telecommunications “tree” tower, 155 feet in height, accompanied by related ground equipment to be located near the base of the tower. The structures are to be located within a 50-foot square compound, surrounded by 8-foot tall board on board fence. The tower, as proposed, is sited on the property’s highest point, and the tree pole will rise above the natural tree line.



RECOMMENDATION Approval to transmit comments:

1. Utilize a unipole (“flagpole”) type design with internal antennae to replace the proposed pine tree design;
2. Provide substantial forestation and landscaping along the site’s frontage on River Road: 1,550 linear feet on the east-west orientation of the road, and 500 feet on the north-south orientation of River Road; trees should be a mix of indigenous species, a mix of deciduous and coniferous in naturalistic groupings; the number of trees should average that of a 50-foot spacing along the linear distances; trees should measure 3.5-inch caliper at the time of planting;
3. Provide additional tree planting on the west side of River Road, south of the intersection of River Road and Great Seneca Road; trees should be carefully sited close to the right-of-way line, accommodating for utility lines; trees species, size and spacing to follow that indicated in Condition (9), above.
4. Remove the tower and equipment compound within twelve weeks of cessation of the use of the facility.
5. Install a sign not more than two feet square affixed to the equipment compound identifying the owner, operator, and maintenance service provider of the support structure and the name and telephone number of a contact person.
6. Submit documentation on height and location of the tower to the Department of Permitting Services prior to final inspection of the building permit;
7. Operate the telecommunications monopole is operating within Federal Communications Commission (FCC) standards on an annual basis, and additionall, an actual radiofrequency (RF) measurement should be provided after the telecommunications monopole/unipole is installed, and after each co-location on the subject pole.

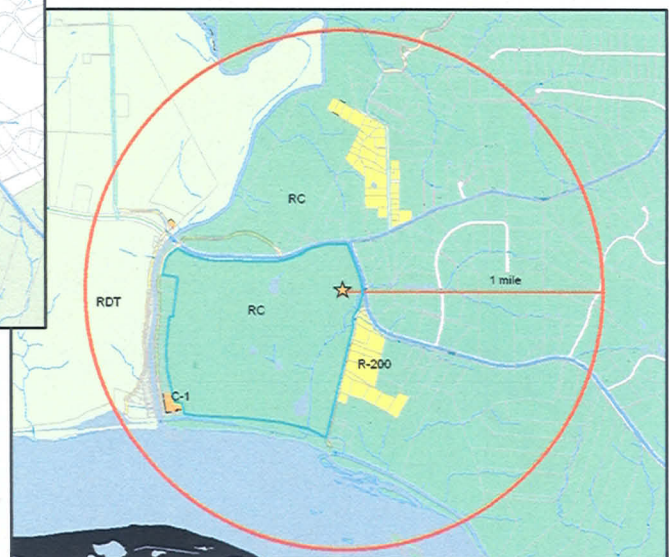
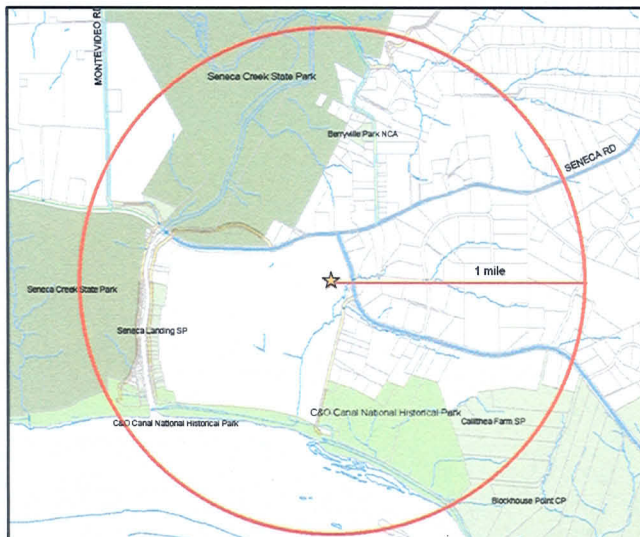
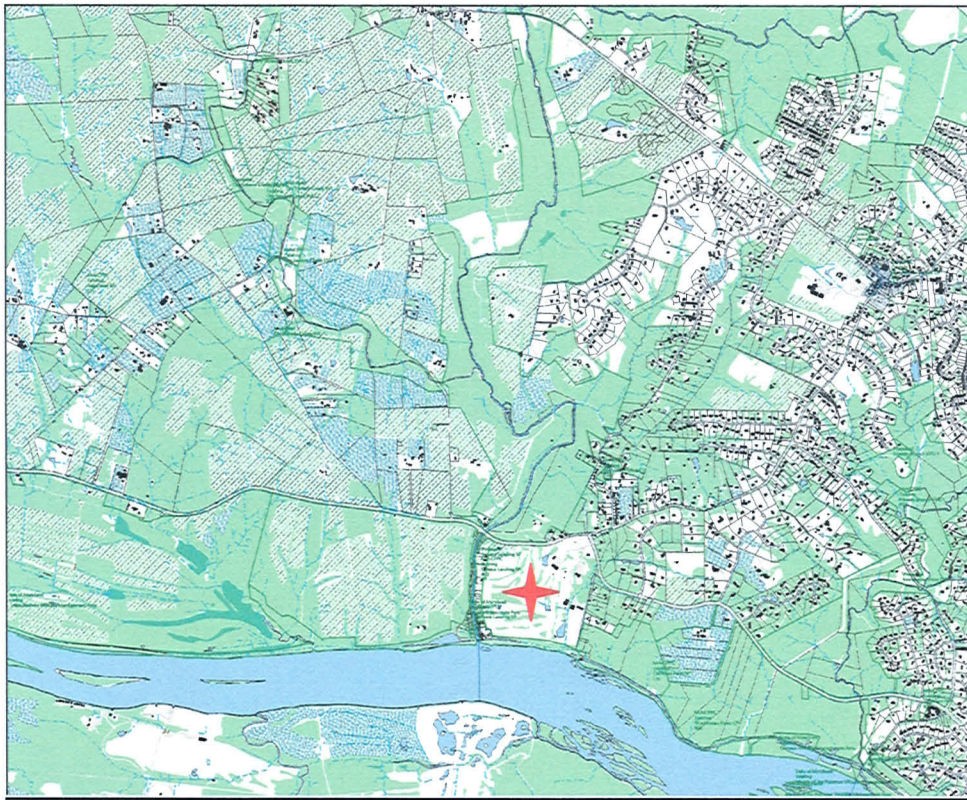
PROJECT DESCRIPTION

Surrounding Neighborhood

The Bretton Woods site lies at the westernmost reach of the Potomac Subregion Master Plan area, at the eastern edge of the Agricultural Reserve and the Seneca Creek State Park. The area’s character is expressed by contrasting lot patterns, varied scales, with narrow country roads which feed into major vehicular routes to reveal a thoughtful, well planned suburban to rural transition.

The Potomac River, lined on the north by the historic Chesapeake and Ohio Canal (Canal) and tow path, dramatically defines the southern boundary of the site. River Road rises more than 100 feet from the Potomac River. The Canal’s system of river-edge locks and their associated structures, richly define the vicinity and the site envelope, as do the abundant natural resources of Seneca Creek State Park, articulated by Seneca Landing and Riley’s Lock (No. 24), along with Blockhouse Point Park, bounded by Violette’s Lock (No. 23) on the eastern edge of Bretton Woods and Pennyfield Lock (No. 22), further down river. Other historic resources in the vicinity include the Seneca store, the Upton Darby House, Seneca Quarry, Aqueduct, Quarry Master’s House, the Overseer’s House at Montivideo, and the Seneca Stone School. The subject site, although located within the Seneca National Register Historic District, does not include any historical assets.

The roadways support substantial traffic loads along River Road, which joins Great Seneca Road at the site's northeast corner.



Site Description

The Potomac River to the south, Violette's Lock Road to the east, and River Road on the north and northeast form the boundaries of the site. The 282-acre site, features terrain that rises from the river, with steep slopes in the northeast quadrant of the site.

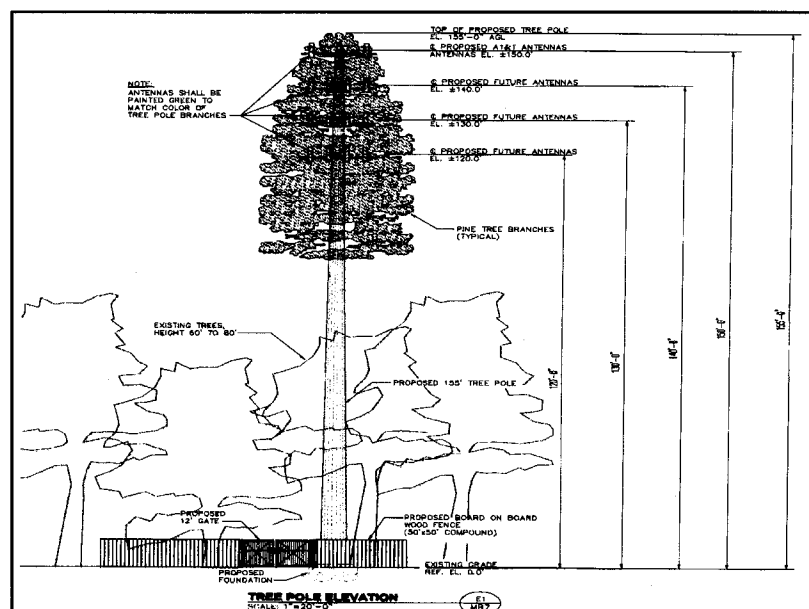
The site was acquired by the IMF during the 1960's and Special Exception approval was granted, in 1966, for the use and development of the site as a recreational club for IMF members. The first phase of development concerned the creation of the 18-hole golf course, accommodation of a future sewer system, a stream dam, swimming pool complex, baseball and soccer fields, a field house, athletic fields, and golf building. Subsequent amendments and Special Exceptions granted approval for additional tennis courts, surface parking, a maintenance building, a golf cart shed and expansion, a caretaker's house, and roof(s) for the tennis courts. (See list of Special Exceptions granted, below.) Currently, there are 12 structures shown on the site.

The Proposed Plan

Purpose: The applicant states that the purpose of the proposal is to improve service to motorists and residents near River and Seneca roads, the surrounding vicinity and Seneca Creek State Park; the applicant has also cited the necessity for IMF cellular coverage for use of the site for emergency evacuation.

Tower Design and Siting: The plan proposes to locate a 155-foot "tree" style monopole within the northeast quadrant of the Recreation Club, at the highest elevation point, to achieve enhanced transmission performance afforded by the topography. Drawings show the monopole's siting to be constructed amidst a stand of pine trees adjacent to the swim club parking lot, and between the pool and the caretaker's residence. Behind the site for the monopole, there is a wooded area that extends to near River Road. The natural tree line of the forested area reaches a height between 60-75 feet. The tower will measure about 5 feet in diameter at its base. The "pine tree" branches, as measured from the submitted drawings will be about 25 feet in diameter. (See set of submitted drawings, Attachment 17.)

Compound: The facility compound will be 50 feet by 50 feet, with concrete foundation and footings, enclosed by a board on board fence to conceal and secure the supporting ground equipment. The compound can accommodate four equipment cabinets, one for AT&T and three for future leases. The unmanned facility will be in operation 24 hours per day, 365 days per year, and



generating 1-2 trips per month for maintenance. Access to the facility will be provided via the existing driveway serving the swimming pool complex slightly to the south.

Cellular Coverage and Performance: The applicant has submitted radio frequency contour maps illustrating the calculated cellular coverage under (a) existing conditions, and with antennae at (b) +160 elevation, (c) +150 elevation, and (d) +140 elevation.

The *Coverage Map for Existing Conditions*, (Attachment 5) shows an area, three miles square and centered on the site, that is without any AT & T reception (shown in white); coverage shown for indoor levels (-77), automobile levels (-82) and outdoor levels (-87) increases markedly in concentric circles that envelope the other cell AT&T towers in Darnestown, Blockhouse Point, and Sugarland. The *Coverage Map for the Proposed Tower* shows future serviceable coverage at (-77) for an area approximate 2.5 square miles from the site's center; (-82) level coverage extending another ½ mile, and (-87) coverage levels a further ½ mile yet.

REGULATORY FRAMEWORK

Regulatory History of the Site

The property of Bretton Woods Recreation Club was developed by the IMF through the approval by the Board of Appeals of Special Exception BA-2114, December 6, 1966. (See Opinion, Amendment, Attachment 7.) Findings of facts and conclusions made by the Board of Appeals:

- *The main objective of the IMF is to promote a freer system of world trade and payments as a means of helping its members to achieve economical growth, higher levels of employment and improved standards of living;*
- *That there are presently 105 member nations, including the United States of America;*
- *That the Fund is in no way an agency of the United States Government, nor is the proposed project in anyway supported by Federal funds;*
- *The purpose of purchasing the 282-acre tract of land is for the use of members of the Fund, and that said use of a recreational area is necessary because most of the members of the fund come to American with their families and desire that recreational facilities be made available for them while in Washington, DC or its adjoining suburbs.*

The Board of Appeals hearing addressed immunity and conformance to local law(s):

The attorney for one of the adjoining property owners on the Violets Lock Road pointed out that under a provision of the Bretton Woods agreement, the applicant enjoyed immunity and requested that the Fund waive the same, but the Fund, by its attorney, indicated it would not be able to waive this immunity. Testimony was given that the Fund has conformed to the law in every country into which its operations reach and that it was the intention of the Fund to conform to the law as indicated by the filing of the subject petition.

Condition 1: That Petitioner shall, within twenty (20) days from the date hereof, file with the Board of Appeals a formal waiver of the right to claim immunity from any Federal, State or Montgomery County law or regulation pertaining to the use of the subject property;

The Board deleted Condition 1 upon the applicant's Petition for Amendment dated December 14, 1966 and amended paragraph 5, page 4 to read as follows:

Accordingly, and in accordance with the testimony and exhibits of record, the Special Exception for the use proposed is granted to the Petitioner only, with the understanding that the International

Monetary Fund shall observe all laws, rules and regulations of the State of Maryland and of Montgomery County in regard to the use of the subject property . .

In compliance with the above noted condition, the IMF submitted Special Exception Petitions for a series of development proposals:

Case No.	Opinion	Type	Use Approved	Status
BA 2114	12/6/66	SE	Established the site and use as a private club: 18-hole golf course; swimming pool, basketball court, pond field house, golf shop; landscaping; future sewer line; stream dam;	built
BA 2517	2/4/69	SE	Storage and Maintenance Building to replace Barn; 8,500 sf.	built
BA 3003	4/27/71	SE	Additional construction: tennis course, golf building extension, new swimming pool, snack bar additional and new caretaker's house.	built
S-473	5/19/76	SE Amend.	Additional construction: 4 tennis courts, 2 shuffleboard courts, two horse-shoe courts, additional parking facilities, extension of one shelter house, construction of a second shelter house, extension of a golf cart building, erection of a perimeter fence and entry gate.	built
S-473	6/16/76	S-473 Mod.	Deletion of Condition No. 9 regarding live music performance	built
S-473	2/11/81	S-473 Mod.	Golf cart storage expansion	
S-473	12/6/82	S-473 Mod.	Tennis bubble roof (seasonal use)	unbuilt
CBA 3003-A	6/29/83	SE-473 Amend.	Tennis bubble roof - permanent structure & butler building	unbuilt
CBA 3003-B	9/12/90	SE-473 Amend.	Seasonal air-supported tennis roof	

The proposal now before the Planning Board was initiated in Summer 2008 as Special Exception Petition S-2745, naming AT&T as the applicant. The Transmission Facility Coordinating Group (TGCG or "Tower Committee") reviewed the proposal on August 6, 2008, and conditioned its recommendation for approval upon the applicant, AT&T, being granted a Special Exception by the Board of Appeals.

The Mandatory Referral Application

The applicant pursued review by means of the Mandatory Referral process, The Office of General Counsel, Montgomery County Planning Board, reviewed the applicant's request in March 2010 and provided the following determination:

The Office of General Counsel (OGC) has been asked to determine whether the proposed telecommunications tower to be located on International Monetary Fund (IMF) property is subject to the Special Exception approval process as indicated by the Tower Committee, or whether it falls within the scope of a mandatory referral review as suggested by the Applicant. The OGC has determined that the project is appropriate for mandatory referral review. The Articles of Agreement of the IMF (Agreement) have been given the force and effect of federal and state law by virtue of Title 22, Section 286h of the United State Code, known as the Bretton Woods Agreements Act (Act). Specific provisions within Article IX of the Agreement provide that to the extent necessary to carry out their activities, all property and assets of the IMF shall be free from regulatory restrictions. In other words, IMF is to be treated as if it were a federal agency and its property as federal property. The IMF considers reliable telecommunications service

essential to its operations. As set forth in the attached letter dated December 17, 2009, from Mary Beth Kelly, Deputy Chief in Charge, Facilities Management Division, Technology and General Services Department of the IMF to the Planning Board, the telecommunications project is necessary for the Bretton Woods facility because it serves as a vital back-up headquarters facility to the IMF Headquarters in Washington, D.C.

(See Attachment 9: Title 22, Section 286h of the United State Code; Attachment 10: Articles of Agreement: Article IX-Status, Immunities, and Privileges.)

The treatment of the Bretton Woods Communications Facility as a Mandatory Referral has raised considerable questions by numerous entities, including the Rustic Roads Advisory Committee, the Montgomery Countryside Alliance (representing six groups), and the Tower Committee itself. Chair Royce Hanson's letter to the applicant, included with Attachment 10, encouraged the IMF to file the Special Exception,

The Mandatory Referral Review

Staff has initiated considerable coordination among civic groups concerning the Bretton Woods application, as well as communication with the Rustic Roads Advisory Committee and Historic Preservation groups and the National Park Service. Planning staff notified adjoining and abutting property owners within the past 30 days with notice of the hearing date; the notice was placed in the Planning Board meeting agenda and on the agency's website.

The applicant met with Michael Weill, of the National Capitol Planning Commission, but corresponded only by email or telephone with representatives of other groups: Sugarloaf Citizen Association, West Montgomery Citizen's Association, Rustic Road Advisory Committee, and National Park Service. (See Attachment 11: Applicant's letters, dated August 24 and September 1, 2010, outlining community contacts by telephone and email.)

ANALYSIS

The Transmission Facility Coordinating Group

On August 6, 2008, the Transmission Facility Coordinating Group (The Tower Committee) reviewed the subject application and recommended approval of this proposed facility, a support structure with external antennae concealed within a "pine tree" design that will accommodate antennae from at least two other carriers. The Committee's approval, along with the recommendations included in the technical report [Attachment 8], was conditioned on the applicant being granted a Special Exception for the monopole by the Board of Appeals. The tower committee concluded that there are no existing structures to which the antennas could be attached.

However, the report referenced by the Committee noted the existence of a fiber-optic based Distributed Antenna System (DAS) erected by NextG that currently provides coverage along the site's River Road frontage. Its description outlines the basic configuration of the DAS and its capacity to accommodate other carriers with those entities providing additional hub equipment and antennae. The report notes that spare capacity may be available within NextG's network. The applicant, however, advised the Committee and subsequently, Planning staff, that they will not consider the use of DAS technology in this geographic area. Committee members have, in communication with Planning staff, emphasized that the Committee and/or its consultants do not make recommendations for alternative telecommunications systems to applicants, as the Committee's charge is to evaluate the proposal as brought forth.

The technical analysis noted the implications to the surrounding area: the tower's proximity to Violette's Lock Road, a designated Rural Rustic Road. Although requested to provide distance surveys between the pole, and Violette's Lock Road and the nearest residence, the applicant did not provide this information to the Committee.

The report describes the natural tree line (at the proposed elevation) at a height of 60-75 feet high; whereas the tower height will be 155 feet, an extension of 80-95 feet above the tree line. The technical report also describes the visual impact of the pole, thus: "Based on our observation of a balloon test, the top of the monopole may also be visible to residents across River Road from the site, from the intersection of Seneca Road and River Road, and perhaps to some residents across Signal Tree Lane approximately one mile from the site. However, the visual impact may be minimized by the distance of the monopole from those locations . . . it is likely that the monopole may not be seen from other locations . . . due to the many tall trees in the vicinity and the hilly terrain of the area around the site and to the tower's disguise as a tree."

The RF contours submitted by AT&T show a need for antennae to serve the area, and the subject tower would provide the desired coverage. [See Attachments 5, 6] The applicant did not provide contour maps for antennae 20 feet and 40 feet lower than the proposed tower, stating that such tower height would not provide the desired coverage. The coverage map for the 140' level, however, indicates approximately half the coverage from what is shown for the 150' height; while almost the same level of coverage is achieved by the 150' height and the 160' height. Coverage to the northwest areas ½ mile beyond to the northwest shows little difference from what currently exists with or without the proposed antenna. Terrain change within the Seneca Creek State Park diminishes the signals in that direction.

Master Plan

Staff makes the following findings regarding consistency with the Potomac Subregion Plan:

- The proposed tower and compound are located in a relatively small area, and was sited to reduce the loss of existing trees; the applicant has located the facility to minimize the impact on the Subregion's environmental quality.
- Providing cellular service in this area will serve existing and future residents. Based upon the applicant's coverage map for a 160-foot tower, the proposed tower may provide in-building coverage for approximately 225 structures, of which about 120 are residences (the balance include Bretton Woods facilities, Poole's Store and park buildings).
- By the use of a "tree" design, the applicant seeks to protect C&O Canal, transportation corridors and residential communities from incompatible design of special exception uses. As noted in the submission, the existing mature trees are 60 to 80 feet tall, so the proposed "tree" will be 75 to 95 feet taller than the existing trees. A summertime balloon test shows that the tower will be visible from River Road; during the winter, the nearby deciduous trees will lose their leaves and the tower will almost certainly be visible from the C&O Canal, area roads and residential neighborhoods in the vicinity. To reduce the impact on the C&O Canal, nearby roadways and communities, staff recommends co-locating with the existing Distributed Antenna System (DAS) facility or using a unipole or thin pole design instead of a tree.
- This co-location or thin pole design would also address the Plan's recommendation for protecting Potomac's historic resources.

Regarding conformance with the Plan's policy for special exception uses, staff finds:

- This proposal in this location should have only limited impacts to the established neighborhoods, and it should receive increased scrutiny because of the adjacent C&O Canal National Historical Park. As above, summertime balloon tests show that the proposed tower will be visible from River Road and the residential area along it; in the wintertime, staff anticipates that it will be visible from the C&O Canal. Staff finds that a thin pole design or co-location with the existing DAS facility would have a lesser impact.
- Current, the applicant has coverage in this area from two monopoles on River Road (see attachment) and a "flagpole" facility on Route 28 at Seneca Road; there is a gap in this location. The most effective way to avoid over-concentration of telecommunications facilities, as directed by the Plan, is through co-location with the existing DAS facility.
- To protect the C&O Canal, major transportation corridors and residential communities from incompatible designs, the least obtrusive design should be used. Staff finds that co-locating with the existing facility is the least obtrusive, followed by a thin pole design.
- The applicable guidelines for design and review relate to screening and buffering; in the event that the applicant cannot co-locate with the existing DAS facility, or use a thin pole design, screening along the River Road frontages will be needed. Staff recommends a staggered double row of native trees from the DOT Approved Major Tree list, planted 40 feet on center or closer.

Staff additionally reviewed the proposal in the context of the Rustic Roads Functional Master Plan (RRFMP). The plan includes the following guidance on views:

The views from rustic and exceptional rustic roads are of particular interest. Where the roads go through forest areas, such as within parkland, probably little change will occur. When the roads go through pastures or open views to distant mountains or even through short views to farm

fields and stream valleys, any additional building has the potential to destroy such a view. It also has the potential to create and enhance scenic views (p. 36).

The RRFMP does not restrict development, but rather, it seeks to maintain scenic vistas, where practical, by recommending building placement (p. 36).

Because this site has rustic roads on three sides, a location in the center of the site might best conform to the RRFMP. The Rustic Roads Advisory Committee recommends thin pole designs for telecommunications facilities near rustic roads, and staff agrees that this recommendation reduces the impact on the roads and is consistent with the intent of the Plan.



Development Standards in the RC Zone

Bretton Woods Country Club - International Monetary Fund Cell Tower Installation 15700 River Road, Potomac MD					
Rural Cluster Zone	Special Exception Cit.	Development Data	RC Zone Std.	SE Telecom Std.	Proposed
§59-C-9.42	§59-G-2.58	Lot Size min.			
		Lot Area - acres	5 ac.		280.35 ac.
		Lot Area - sf	217,800 sf		12,212,046 sf
§59-C-9.43		Lot Width min.			
		Lot width at street [River Rd.]	300'		>1,000'
		Lot width at bldg line	300'		>1,000'
§59-C-9.46		Lot Coverage max.			
		Sum of building coverage	10%		0.21%
§59-C-9.44		Setbacks min.			
		Street (front)	50'		412.6'
		Side [one side]	20'		565.7'
		Side [sum of two]	40'		1,494.4'
		Side [public ROW: Violettes Lock Rd.]	50'		565.7'
		Rear	35'		3,034.5'
	59-G-2.58 (1)	Setbacks - Telecom Structure min.			
	59-G-2.58 (1)(a)	From Lot Line: equal to ea. foot in height		155'	412.6'
	59-G-2.58 (2)(b)	From Off-site Dwellings		300'	412.6'
§59-C-9.45		Setbacks - Accessory Bldg - [existing] min.			
		Street	80'		389.8'
		Side:			
		Interior lot	15'		n/a
		Abutting public ROW	50'		540.5'
		Rear	10		2,900.1'
§59-C-9.47		Building Height [existing] max.	50'		37.5'
	59-G-2.58 (1)(a)	Telecommunications Facility Dimensions			
	59-G-2.58 (1)(a)(3)	Support Structure & Antenna Height		155' ¹	155.0'
	59-G-2.58 (1)(a)(4)	Landscape/screening Height		6'	6'

¹ Antenna height may be extended to 199 feet if can be demonstrated that the additional height is needed for service, collocation or public safety communication.

Considerations Relevant to Special Exception Review

Planning staff and the Tower Committee reviewed the proposal with reference to Special Exception criteria, by which the use is allowed in the RC and RDT zones. The proposal conforms to the development standards for the RC zone and for the standards applicable to telecommunications facilities.

§59-G-1.2.1 Standard for Evaluation: The standard requires consideration of the inherent and non-inherent effects of the proposed use at the proposed location. Inherent adverse effects are the physical and operational characteristics associated with the particular use, regardless of the physical size or scale of operation. Inherent adverse effects alone are not a sufficient basis for denial of a special exception. Non-inherent adverse effects are the physical and operational effects not necessarily associated with the particular use, or adverse effects created by unusual characteristics of the site. Non-inherent adverse effects, alone or in conjunction with the inherent effects, are a sufficient basis to deny a special exception.

The physical characteristics associated with a telecommunications facility are the placement of antennae on a structure of substantial height above grade, supported by equipment and utility infrastructure on the ground. The significant operational feature is the transmission and reception of signal waves to and from the antennae. Periodic maintenance checks for the proposed use are typical, and although minimal there will be vehicular traffic to the site associated with routine maintenance performed on a monthly basis. There is typically no lighting associated with the use, nor noise generation. These are all inherent adverse effects.

“Stealth” design of telecom towers, a non-inherent effect, has been encouraged to the Tower Committee, the Planning Board and the Board of Appeals to mitigate adverse effects. The Zoning Ordinance encourages the employ of such design as well. The “tree” design, a non-inherent effect. Staff considers the unipole as more appropriate for the area.

The proposed structure’s height and the size of the equipment compound are non-inherent physical and operational characteristics associated with the proposed use. The equipment cabinets will be secured visually and physically by a board-on-board fence (6 feet tall), and not visible to the surrounding area. The height of the proposed “tree” pole will pose visual impact on the immediate area. While the “tree” will be visible to some residences along River Road and Great Seneca Road, and possibly from the Canal, its complete or full visibility from the surrounding environment will be somewhat mitigated by its proposed location amidst a stand of mature trees, 60-75 feet tall, intervening distance and varied terrain.

Siting of a telecom tower is problematic in and of itself. Functionally, to achieve superior performance levels, the structure must be sited on a high elevation. In order to achieve less obtrusive effect, staff believes that the installation of a unipole (with internally fixed antennae) instead of the tree pole, that disguises externally fixed antennae within its branches will provide a more compatible, visually-minimal structure. Trees of such scale are not indigenous to the Mid-Atlantic region, much more characteristic of California; such use calls more attention to the structure than a slender pole of neutral color that may blend with the sky. Staff also calls upon the applicant to verify that the support structure will allow co-location in the future. The applicant has referenced potential carriers to share the facility, but no documentation of such has been submitted.

Transportation

The proposed telecommunications tower will not increase the number of weekday peak period trips generated by the site. No Local Area Transportation Review is required. Policy Area Mobility Review does not require any trip mitigation. Transportation staff finds that the proposed installation of the tower will have no adverse effect on area roadway conditions. [See Attachment 12.]

Environmental

The proposed application is exempt from the requirements of the Montgomery County Forest Conservation Law per Exemption # 42010204E, issued by the Environmental Planning Division, August 16, 2010. [See Attachment 13.] The exemption is approved under Chapter 2-A (5(f), pertaining to governmental projects reviewed for forest conservation. The IMF cell tower application is considered to be a Federal (aka governmental) project and review authority for Federal projects is the Maryland State Department of Natural Resources. Physical impact on the environment consists of root zone disturbance to six trees.

The Maryland Department of Natural Resources has indicated that proposal is exempt from state forest conservation requirements. [See Attachment 14.]

Historic Preservation and Rustic Roads

Historic Preservation (HP) staff note that the site is located with the Seneca National Register Historic District, and may be required to initiate a review under the National Historic Preservation Act regarding undertakings approved by the Federal Communications Commission. Because of the historic significance of the site's setting and numerous historic properties, HP staff recommends, if co-location is not possible, the use of a narrow, slim monopole (unipole) with internal antennae, painted in a neutral color to mitigate the visual impact on the nearby historic sites. [See Attachment 15.] The Rustic Roads Advisory Committee additionally advises the use of a unipole for similar reasons. [See Attachment 16.]

The applicant submitted plans for review by the State Historic Preservation Office (SHIPO) and states that the no comments or conditions were received in response to the filing.

Compatibility

The challenge of achieving compatibility in the siting and construction of a cellular communications tower is significant, never more so than in a rural or naturalistic setting. Such is the case with the proposed plan for Bretton Woods. The very idea of inserting a piece of late 20th century architecture into a bucolic, historical landscape demands a discussion of defining the public good served by such action. The idea is further complicated by the moving, yet enticing targets of developing technologies: smaller, better, more efficient, leading to an array of evolving technological choices, striking in their performance variability or untested in the specific applications required by current needs.

There is no question that the site, and more particularly, its surrounding environment, is unique in its landscape and historicism—its physical, visual and functional beauty. The deep and rich role of the river upon the form of the land and the way in which its occupants plied their trades is felt by all, visitors and residents alike. Yet, it is interesting to observe that this historic setting was generated by river trade, the infrastructure of locks, landings and dams inserted to serve desired sources of commerce, such as the quarries and farms. So too, does a communications tower, intrusive object as it is, serve commerce, lifestyle, community service, and even safety: a balancing of need with aesthetics.

It has been demonstrated that enhanced cellular communications capacity is needed in this location, as noted by the Tower Committee's report. The task is to evaluate the intensity of need and the sensitivity of the setting, while parsing the technologies *feasible* at this point in time to a satisfactory level of understanding. While the applicant has proposed a "tree" monopole with external antennae disguised in

its branches, two other alternatives are available: the Distributed Antenna System (DAS) and the unipole. Vision Division staff recommend the DAS system as most compatible, as does Historic Preservation staff.

The DAS system is designed to provide services along roadways and residential areas near roadways. The system relies on a fiber optic cable network linked to antenna cabinets (approximately 36" x 32" x 25") mounted on utility poles that are located in the public right-of-way at 500 foot intervals. Each utility pole also supports a vertical antenna measuring between 24" and 57". Such systems can accommodate multiple carriers. The cable range is limited to 12 miles and the system requires construction of a service hub at each end of the cable run. Hub stations must be located outside of the right-of-way due to a large footprint that ranges up to 5,000 square feet. Montgomery County has adopted a Telecommunications Ordinance that requires carriers to obtain a franchise agreement to place DAS facilities, cables, antennas and related equipment in the right-of-way.

Members of the community have recommended, along with the Vision Division, that this applicant co-locate service using NextG's existing DAS system. The latter has indeed installed such a system utilizing 34 utility poles along River Road, the northern frontage of the Bretton Woods site. The cable system stretches from the Petrucelli property in Darnestown to the Fire Station on Falls Road in Cabin John.

Although use of the DAS to serve Bretton Woods site offers a seemingly facile solution to the problems of aesthetics, there are significant technical and logistical drawbacks to its employment: (1) as a system designed to serve roadways, the signal reach extends only ¼ mile radius from the antennae and the system would not provide service to the large southern portion of the IMF site; (2) some have suggested that utility service could be installed on the southern portion of the IMF site, providing poles (and power) for antennae that could be linked to the existing NextG system within the River Road right-of-way; wetlands and environmental conditions appear to preclude this alternative, which would require tunneling under downward sloping terrain; (3) recent conversation with the NextG representative for DAS installations has revealed that existing equipment cabinets are fully subscribed at dual band width, leaving little possibility that AT&T antennae could be accommodated; thus, use of a DAS system by the IMF would require a new, second set of utility poles erected in the right-of-way; (4) the question has been raised (an unanswered) that the IMF would not be eligible as a franchisee due to their exemption from county franchise taxes. It should be noted as well that

The detrimental aspects of the "tree" pole, as discussed above, and the difficulties with the DAS, lead to consideration of the second alternative: the unipole—a slender, flag pole design that houses internal antenna. While the tree pole can accommodate up to 9 external antennae per deck (and three+ carriers), the unipole accommodates three antenna per deck; to house additional carriers within the unipole, additional "decks" are fit inside the pole at lower levels. The difference in capacity to accommodate more carriers offers pros and cons: for the applicant, the unipole provides less revenue generated through leasing (although utilizing another carrier's DAS system would, presumably, provide far less revenue); with respect to compatibility concerns, the unipole is significantly less intrusive; however, its lesser housing capacity may generate the erection of another tower elsewhere in the vicinity to accommodate carriers who desire more service area.

The major tools used to address compatibility issues in the provision of cell towers include control of height, location, setbacks, screening, color and materials, along with co-location. Height, relates to functional performance of transmission quality. In this case, the Tower Committee found that tower heights of 150' and 160' provided virtually the same levels of coverage, while a tower at 140' resulted in a smaller coverage area, almost by half. The applicant initially had proposed a location more central to the site; however, the Tower Committee recommended the location point now proposed. The setbacks shown on plans conform to the development standards of the zoning ordinance and with those required

for telecommunications facilities under Special Exception criteria. The tower will be placed amid a grove of mature trees covering the 300' elevation height, obscuring the tower from a number of locations. Staff recommends substantial planting along the River Road frontage to screen the view of the tower for nearby residences. A neutral color, grey or brown is recommended as well, to allow the form to blend into sky views. The single slender metal unipole will allow such painting. Staff asks the applicant to verify arrangements for co-location of carriers on this tower.

OUTREACH

Staff has encouraged the applicant to schedule presentations with community and professional groups in the area. The applicant, however, has not presented the plans in any public forum. Rather, the applicant has communicated individually by email and telephone with representatives of certain groups. (See Attachment 11.)

Staff has heard directly from the Montgomery Countryside Alliance (representing six other community groups) the Darnestown Civic Association, and two adjoining property owners. The Alliance has expressed great concern over the review of the project as a Mandatory Referral, and the use of public land for a private entity, the tower height, the "tree" design, the ground elevation proposed, and finally, impacts of the tower on the natural and cultural sensitivity of the surrounding area. The Alliance strongly requests that the applicant co-locate the facility with other carriers. (See Attachment 18.)

CONCLUSION

Staff finds that proposed design of the tower, the "pine tree" design is not compatible with the surrounding environment. Staff recognizes the need for cellular transmission service for the site and recommends that the applicant employ a unipole design with internal antennae, painted a neutral color to minimize the effects of the structure on the neighboring area. Staff further recommends the planting of significant trees to screen the tower as much as possible.

BRETTON WOODS - IMF CELL TOWER



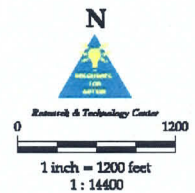
Map compiled on July 12, 2010 at 4:38 PM | Site located on base sheet no - 217NW16

NOTICE

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Property lines are compiled by adjusting the property lines to topography created from aerial photography and should not be interpreted as actual field surveys. Planimetric features were compiled from 1:14,400 scale aerial photography using stereo photogrammetric methods. This map is created from a variety of data sources, and may not reflect the most current conditions in any one location and may not be completely accurate or up to date. All map features are approximately within five feet of their true location. This map may not be the same as a map of the same area plotted at an earlier time as the data is continuously updated. Use of this map, other than for general planning purposes, is not recommended. - Copyright 1998

MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
8787 Georgia Avenue - Silver Spring, Maryland 20910-2700



ATTACHMENT 2



BRENTWOOD - BRETON WOODS COUNTRY CLUB
10011258 461G1192

SCOPE OF WORK:	NEW INSTALLATION OF UNMANNED TELECOMMUNICATIONS FACILITY	PROPERTY OWNER:	INTERNATIONAL MONETARY FUND 1800 K STREET, N.W. GERMANTOWN, MD 20874 (202) 623-6043
SITE ADDRESS:	15700 RIVER ROAD GERMANTOWN, MD 20874	APPLICANT:	NEW CINGULAR WIRELESS PCS, LLC. (G/P/S AT&T MOBILITY) 10000 WOODBURN PARKWAY HANOVER, MD 21076 (410) 712-7883
LATITUDE:	39° 04' 34.371"		
LONGITUDE:	41° 035"		
LOCAL NUMBER:	03246106		
MAP / PCECL:	DR14 / U231		
JURISDICTION:	MONTGOMERY COUNTY, MD		
CURRENT USE:	GOLF COURSE		
PROPOSED USE:	TELECOMMUNICATIONS & TELECOMMUNICATIONS FACILITY		
ZONING:	RC		
HEIGHT:	155'-0"		

MR1	TITLE SHEET	0
MR2	SITE SURVEY	0
MR3	ADJOINERS PROPERTY PLAT	0
MR4	ADJOINERS LIST	1
MR5	ADJOINERS PLAT PROUGH AND SENEWIT CONTROL PLAN	0
MR6	NATURAL RESOURCE INVENTORY, JUNE 2010	0
MR7	NRIFSDF PLAN, NOVEMBER 2001	0
MR8	TREE LIST, NOVEMBER 2001	0
MR9	PROFILE SECTIONS	0
MR10	COMPOUND PLAN AND TREE POLE ELEVATION	0
MR11	CONNECTION DETAILS	0
MR12	CIVIL DETAILS	0

AT&T CONSTRUCTION:	DATE:	AT&T RF:	DATE:
AT&T COMPLIANCE:	DATE:	AT&T REAL ESTATE:	DATE:

ADJ.	ADJUSTABLE	MCH	MECHANICAL	SPOT ELEVATION
CAB	CABINET	MFR	MANUFACTURER	CONTINUING
CLC	CEILING	MIN	MINIMUM	PLATE
CONC	CONCRETE	MTL	METAL	DETAIL NUMBER
CON	CONCRETE	NTS	NOT TO SCALE	SHEET NUMBER
CON	CONSTRUCTION	OC	ON CENTER	SH
DIA	DIAMETER	OPP	OPPOSITE	— G —
DWG	DRAWING	SF	SQUARE FOOT	GROUND WIRE
EGR	ELECTRICAL	SH	SHIELD	CONDUIT CABLE
EL	ELECTRICAL	ST	STAINLESS STEEL	ANTENNA
EQ	EQUAL	STL	STEEL	FUTURE ANTENNA
EQUIP	EQUIPMENT	TOP	TOP OF CONCRETE	
EXT	EXTERIOR	TOM	TOP OF MASONRY	
F	FLOOR	TP	TYPICAL	
FLR	FLOOR	TP	TYPICAL	
GA	GALVANIZED	VF	VOID IN FIELD	
GNLY	GALVANIZED	W	WELD	
GB	GROUND	W/	WELDED WIRE FABRIC	
GC	GENERAL CONTRACTOR	W	WELD	
GRD	GROUND	W/	WELDED WIRE FABRIC	
GRD	GROUND	W/	WELDED WIRE FABRIC	
HT	HORIZONTAL	W/	WELDED WIRE FABRIC	
LH	LONG LEAD	W/	WELDED WIRE FABRIC	
LH	LONG LEAD	W/	WELDED WIRE FABRIC	

DIRECTION: *FROM 7150 STANDARD DR. HANOVER, MD 21076 TAKE I-95 S. toward WASHINGTON. Merge onto I-495 W/ CAPITAL BELTWAY via EXIT 27 toward SILVER SPRING. Take the MD-187 exit. EXIT 36, toward OLD GEORGETOWN RD/ BETHESDA/ ROCKVILLE. Merge onto MD-187 N/ OLD GEORGETOWN RD toward ROCKVILLE. Turn LEFT onto DEMOCRACY BLVD. DEMOCRACY BLVD becomes S GLEN RD. Turn LEFT onto NORTON RD. Turn RIGHT onto RIVER RD/ MD-190. Arrive at 15700 River Rd Germantown, MD 20874-3534



SUBCONTRACTOR'S WORK SHALL COMPLY WITH ALL APPLICABLE NATIONAL, STATE, AND LOCAL CODES AS ADOPTED BY THE LOCAL AUTHORITY HAVING JURISDICTION (AHJ) FOR THE LOCATION. THE EDITION OF THE AHJ ADOPTED CODES AND STANDARDS IN EFFECT ON THE DATE OF CONTRACT AWARD SHALL GOVERN THE DESIGN.

BUILDING CODE:
[9c 2006]

ELECTRICAL CODE:
NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 70 - 1999, NATIONAL ELECTRICAL CODE, AS ADOPTED BY WASHINGTON, DC]

SUBCONTRACTOR'S WORK SHALL COMPLY WITH THE LATEST EDITION OF THE FOLLOWING STANDARDS:

AMERICAN CONCRETE INSTITUTE (ACI) 318, BUILDING CODE REQUIREMENTS FOR STRUCTURAL CONCRETE

AMERICAN INSTITUTE OF STEEL CONSTRUCTION (AISC), MANUAL OF STEEL CONSTRUCTION, ASD, NINTH EDITION

TELECOMMUNICATIONS INDUSTRY ASSOCIATION (TIA) 222-H, STRUCTURAL STANDARD FOR STRUCTURAL ANTENNA TOWER AND ANCHOR SUPPORTING STRUCTURES

INSTITUTE FOR ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE) B1, GUIDE FOR MEASURING EARTH RESISTIVITY, GROUND

RESISTANCE, AND GROUNDING PRACTICES FOR LOW VOLTAGE AC POWER CIRCUITS (FOR LOCATION CATEGORY C3 AND HIGH SYSTEM EXPOSURE.)

IEEE 1000 (1999), RECOMMENDED PRACTICE FOR POWERING AND GROUNDING OF ELECTRONIC EQUIPMENT

IEEE 682-A, RECOMMENDED PRACTICES ON SURGE VOLTAGES IN LOW VOLTAGE AC POWER CIRCUITS (FOR LOCATION CATEGORY C3 AND HIGH SYSTEM EXPOSURE.)

TIA 607 COMMERCIAL BUILDING GROUNDING AND BONDING REQUIREMENTS FOR TELECOMMUNICATIONS

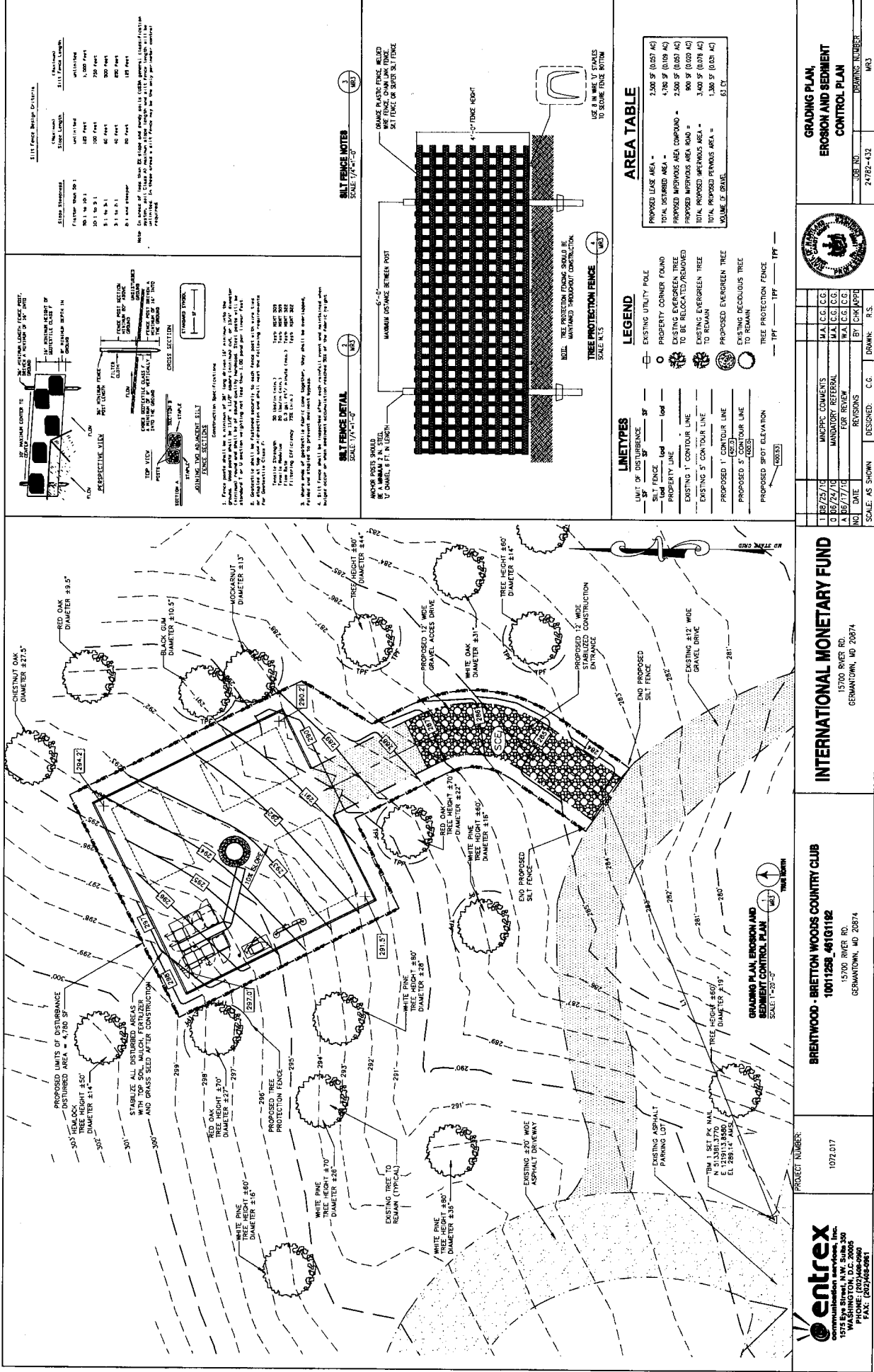
TELORDIAN GR-1501 COAXIAL CABLE CONNECTIONS

FOR ANY CONTACTS BETWEEN SECTIONS OF LISTED CODES AND STANDARDS REGARDING MATERIAL METHODS OF CONSTRUCTION OR SPECIFIC REQUIREMENTS, THE MOST STRINGENT SHALL PREVAIL. THERE IS NO CONFLICT BETWEEN A GENERAL REQUIREMENT AND A SPECIFIC REQUIREMENT. THE SPECIFIC REQUIREMENT SHALL GOVERN.

BRENTWOOD - BRETTON WOODS COUNTRY CLUB
10011258_461G1192
15700 RIVER RD.
GERMANTOWN, MO. 20874

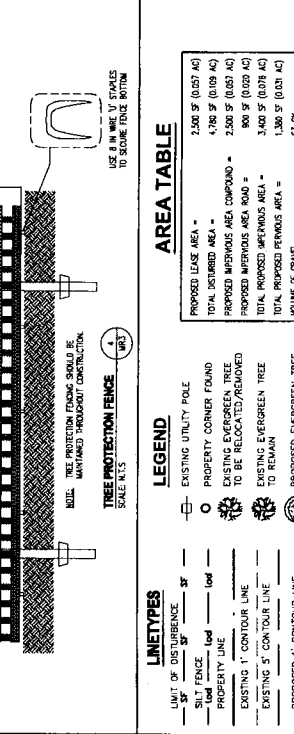
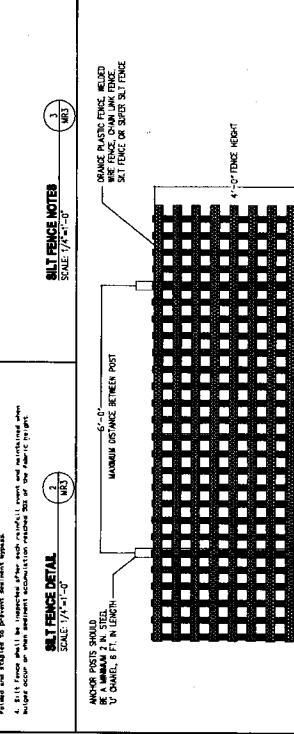
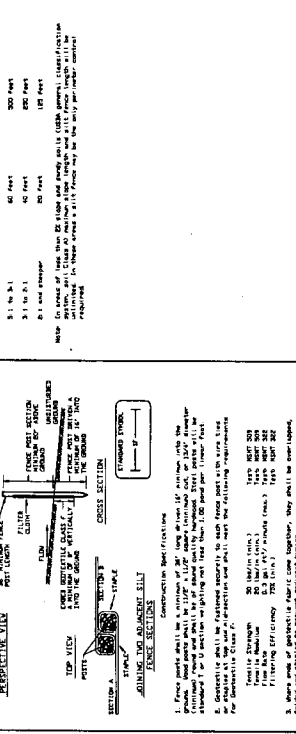
15700 RIVER RD.
GERMANTOWN, MD 20874

NO.	DATE	REVISIONS	BY	CHK	APPROV	DATE	REVISIONS	BY	CHK	APPROV	DATE
1	06/25/10	WINDPPC COMMENTS	W.A.	C.G.	C.G.						
2	06/24/10	MANDATORY REFERRAL	W.A.	C.G.	C.G.						
3	06/17/10	FOR REVIEW	W.A.	C.G.	C.G.						



3.1.1. Fence Material Data Table

Line Number	Material	Length	Notes
1	Galvanized Steel	1,000 Feet	1.000 Feet
2	Galvanized Steel	1,000 Feet	1.000 Feet
3	Galvanized Steel	1,000 Feet	1.000 Feet
4	Galvanized Steel	1,000 Feet	1.000 Feet
5	Galvanized Steel	1,000 Feet	1.000 Feet
6	Galvanized Steel	1,000 Feet	1.000 Feet
7	Galvanized Steel	1,000 Feet	1.000 Feet
8	Galvanized Steel	1,000 Feet	1.000 Feet
9	Galvanized Steel	1,000 Feet	1.000 Feet
10	Galvanized Steel	1,000 Feet	1.000 Feet



AREA TABLE

Line Number	Material	Length	Notes
1	Galvanized Steel	1,000 Feet	1.000 Feet
2	Galvanized Steel	1,000 Feet	1.000 Feet
3	Galvanized Steel	1,000 Feet	1.000 Feet
4	Galvanized Steel	1,000 Feet	1.000 Feet
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8	Galvanized Steel	1,000 Feet	1.000 Feet
9	Galvanized Steel	1,000 Feet	1.000 Feet
10	Galvanized Steel	1,000 Feet	1.000 Feet

entrex
 environmental services, inc.
 1575 Eye Street, N.W. Suite 300
 Washington, D.C. 20005
 Phone: (202) 462-0961
 Fax: (202) 462-0961

PROJECT NUMBER: 1072.017

BRENTWOOD - BRETON WOODS COUNTRY CLUB
 10011259 461G1182
 15700 RIVER RD.
 GERMANTOWN, MD 20874

INTERNATIONAL MONETARY FUND
 15700 RIVER RD.
 GERMANTOWN, MD 20874

GRADING PLAN, EROSION AND SEDIMENT CONTROL PLAN
 SCALE: 1" = 20'-0"

LEGEND

LINE TYPES

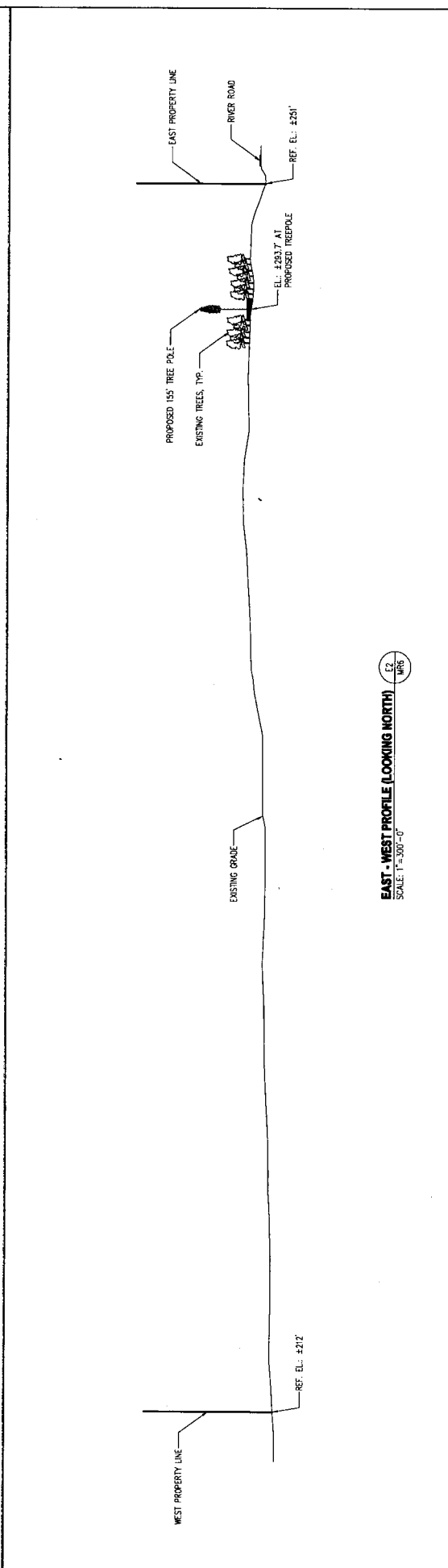
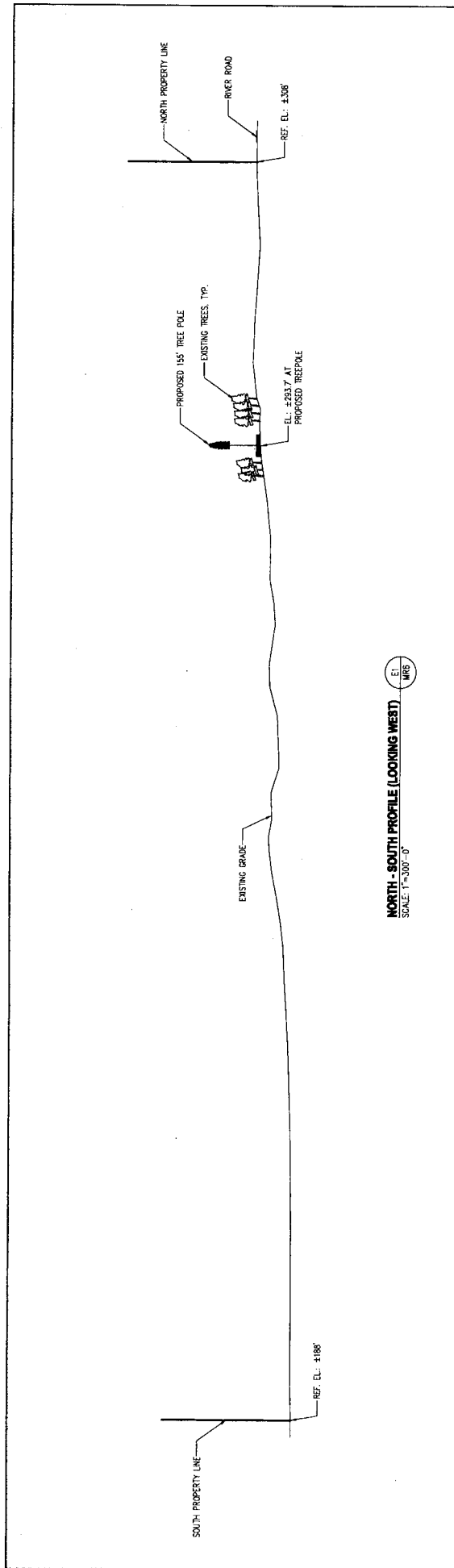
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 PROPERTY CORNER FOUND
 EXISTING EVERGREEN TREE
 EXISTING 1" CONTOUR LINE
 EXISTING 5' CONTOUR LINE
 PROPOSED 1" CONTOUR LINE
 PROPOSED 5' CONTOUR LINE
 PROPOSED SPOT ELEVATION

LEGEND

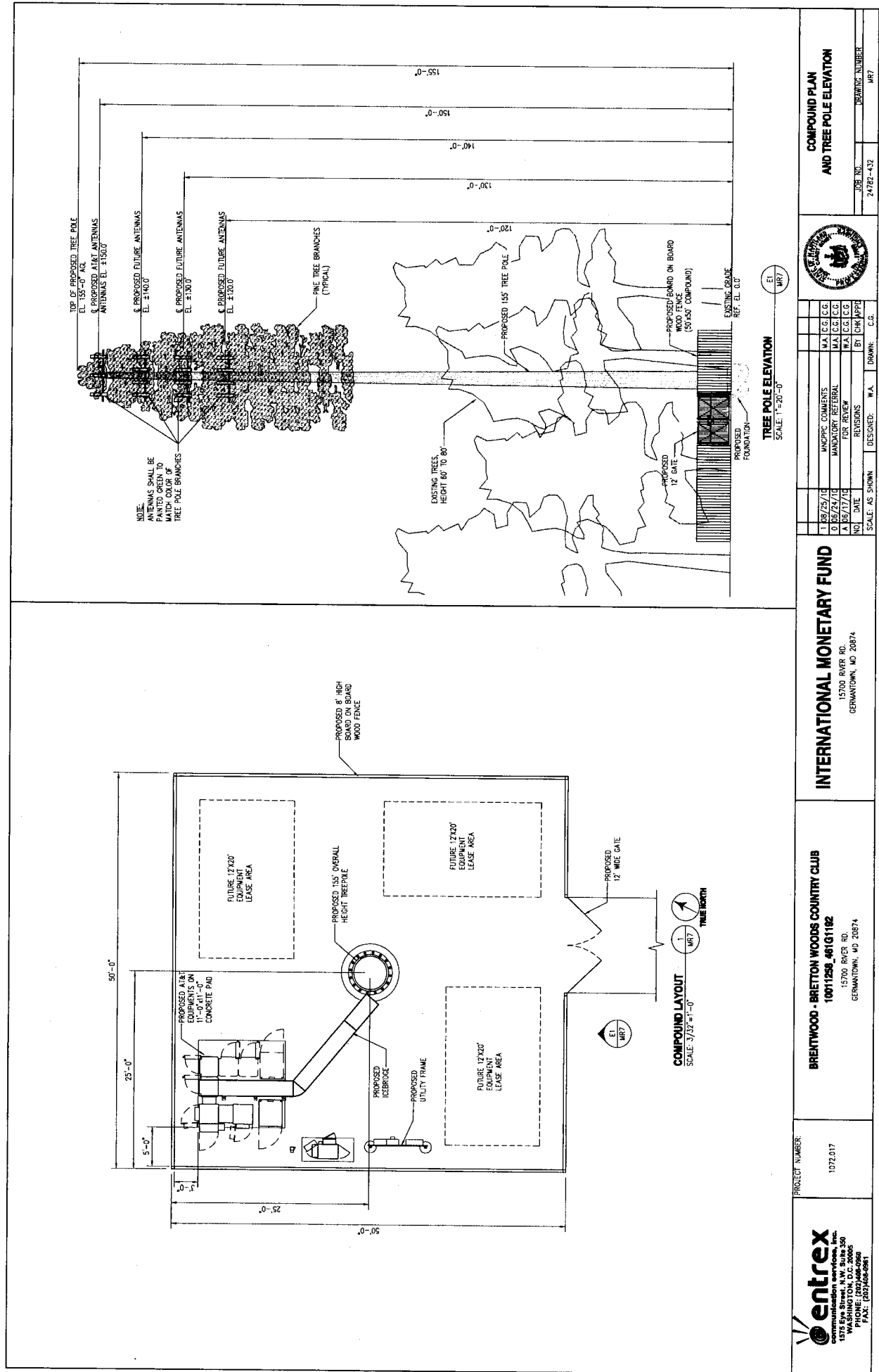
EXISTING UTILITY POLE
 PROPERTY CORNER FOUND
 EXISTING EVERGREEN TREE
 EXISTING 1" CONTOUR LINE
 EXISTING 5' CONTOUR LINE
 PROPOSED 1" CONTOUR LINE
 PROPOSED 5' CONTOUR LINE
 PROPOSED SPOT ELEVATION

AREA TABLE

Line Number	Material	Length	Notes
1	Galvanized Steel	1,000 Feet	1.000 Feet
2	Galvanized Steel	1,000 Feet	1.000 Feet
3	Galvanized Steel	1,000 Feet	1.000 Feet
4	Galvanized Steel	1,000 Feet	1.000 Feet
5	Galvanized Steel	1,000 Feet	1.000 Feet
6	Galvanized Steel	1,000 Feet	1.000 Feet
7	Galvanized Steel	1,000 Feet	1.000 Feet
8	Galvanized Steel	1,000 Feet	1.000 Feet
9	Galvanized Steel	1,000 Feet	1.000 Feet
10	Galvanized Steel	1,000 Feet	1.000 Feet



 entrex communication services, Inc. 1875 Eye Street, N.W. Suite 350 Washington, D.C. 20005 PHONE: (202) 462-2800 FAX: (202) 462-0881	PROJECT NUMBER: 1072.017	BRENTWOOD - BRETON WOODS COUNTRY CLUB 1001259_461G1192 15700 RIVER RD. GERMANTOWN, MD 20874	INTERNATIONAL MONETARY FUND 15700 RIVER RD. GERMANTOWN, MD 20874	 DESIGNED: W.A. DRAWN: C.G. CHECKED: BY CHK/APP DATE: 12/17/00 FOR REVIEW: 12/17/00 MANDATORY RETERRAL: W.A./C.G. MINOR COMMENTS: W.A./C.G. 12/17/00	PROFILES JOB NO.: 24782-432 DRAWING NUMBER: MR6
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BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258 461G1192
15700 River Road
Germantown, MD 20874
A1-Aerial View

4-2



Good



**BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258 461G1192
15700 River Road
Germantown, MD 20874
P1-View Looking East From
13501 Riley's Lock Rd
(NOT VISIBLE)**





**BRENTWOOD
BRETTON WOODS COUNTRY CLUB**
10011258_461G1192
15700 River Road
Germantown, MD 20874
P2-View Looking Southeast
From Montevideo Rd & River Rd
(NOT VISIBLE)





at&t

BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258_461G1192
15700 River Road
Germantown, MD 20874
P3-View Looking Southeast
From Seneca Rd & River Rd
(NOT VISIBLE)

4-5





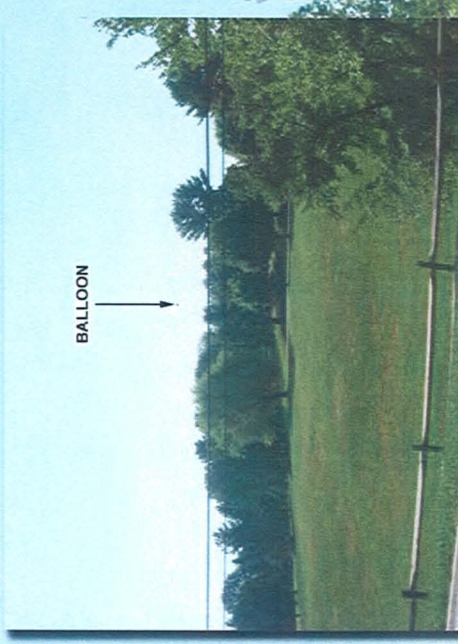
BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258_461G1192
15700 River Road
Germantown, MD 20874
P4-View Looking Southeast
From 15911 River Rd

4-6

BALLOON

ORIGINAL PHOTOGRAPH OF BALLOON

PROPOSED 155' HIGH TREE POLE





BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258, 461G1192
15700 River Road
Germantown, MD 20874
P5-View Looking South
From 15801 River Rd

ORIGINAL PHOTOGRAPH OF BALLOON

PROPOSED 155' HIGH TREE POLE

BALLOON





**BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258.461G1192
15700 River Road
Germantown, MD 20874**

**P6-View Looking South From
Eastern Intersection of
Seneca Rd & River Rd**

BALLOON

ORIGINAL PHOTOGRAPH OF BALLOON

PROPOSED 155' HIGH TREE POLE





4-9

**BRENTWOOD
BRETTON WOODS COUNTRY CLUB**
10011258 461G1192
15700 River Road
Germantown, MD 20874
**P7-View Looking Southwest
From 15701 Seneca Rd
(NOT VISIBLE)**





4-10

BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258_461G1192
15700 River Road
Germantown, MD 20874
P8-View Looking Southwest
From 15715 River Rd at Bretton
Woods Entrance

ORIGINAL PHOTOGRAPH OF BALLOON

PROPOSED 155' HIGH TREE POLE





**BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258 461G1192
15700 River Road
Germantown, MD 20874
P9-View Looking Northwest
From Manor Stone Dr & River Rd
(NOT VISIBLE)**





4-12





4-13

BRENTWOOD
BRETTON WOODS COUNTRY CLUB
10011258_461G1192
15700 River Road
Germantown, MD 20874
P11-View Looking North
From Parking Lot at end of
Violettes Lock Rd
(NOT VISIBLE)





4-14

**BRENTWOOD
BRETON WOODS COUNTRY CLUB**
10011258_461G1192
15700 River Road
Germantown, MD 20874
P12-View Looking Northeast
From Rileys Lock on C&O Canal
(NOT VISIBLE)





Brentwood

15700 River Road, Germantown, MD 20874

Network Objective: To enhance coverage on major commuter routes: River Road, State Hwy 112 and provide in-building coverage to the surrounding communities in Germantown. This will not only fill the coverage holes but also facilitate better handoff between existing Blockhouse point, Sugarland and Darnestown as shown below.

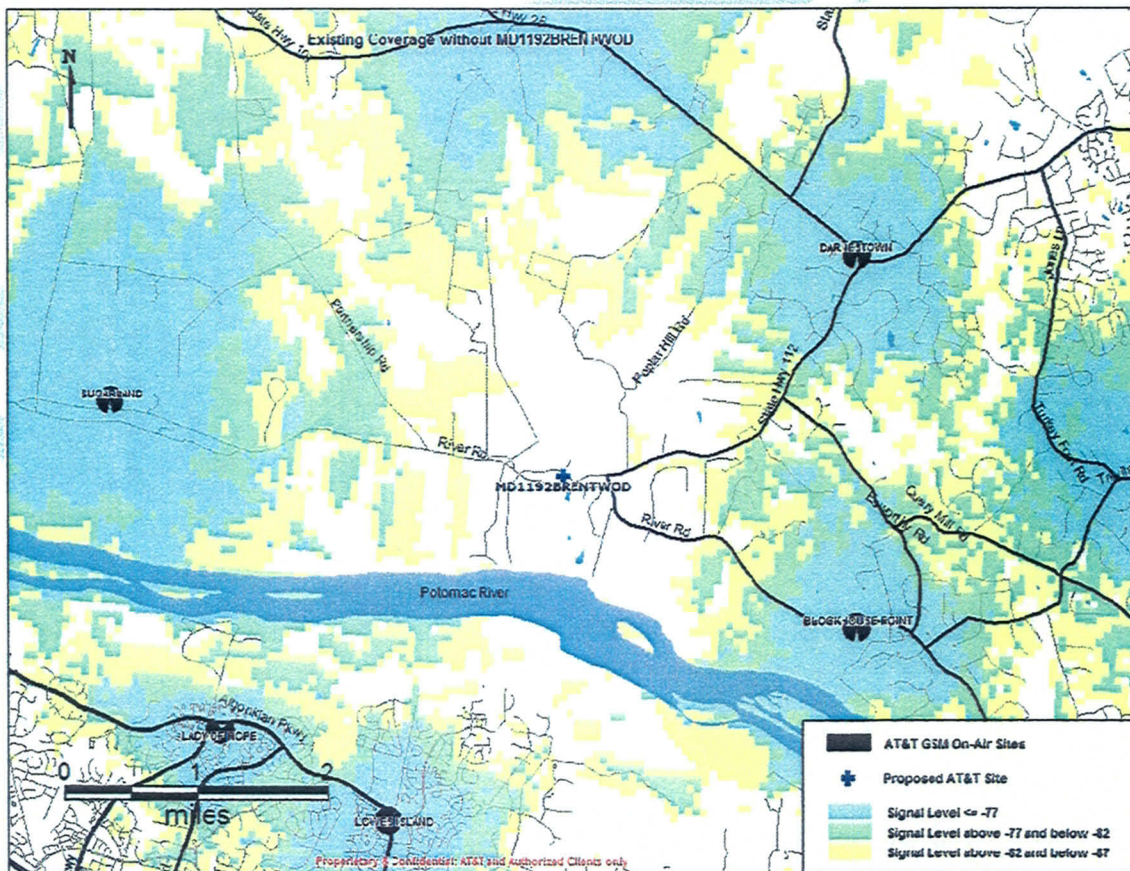


Figure 1: Coverage from Existing Sites

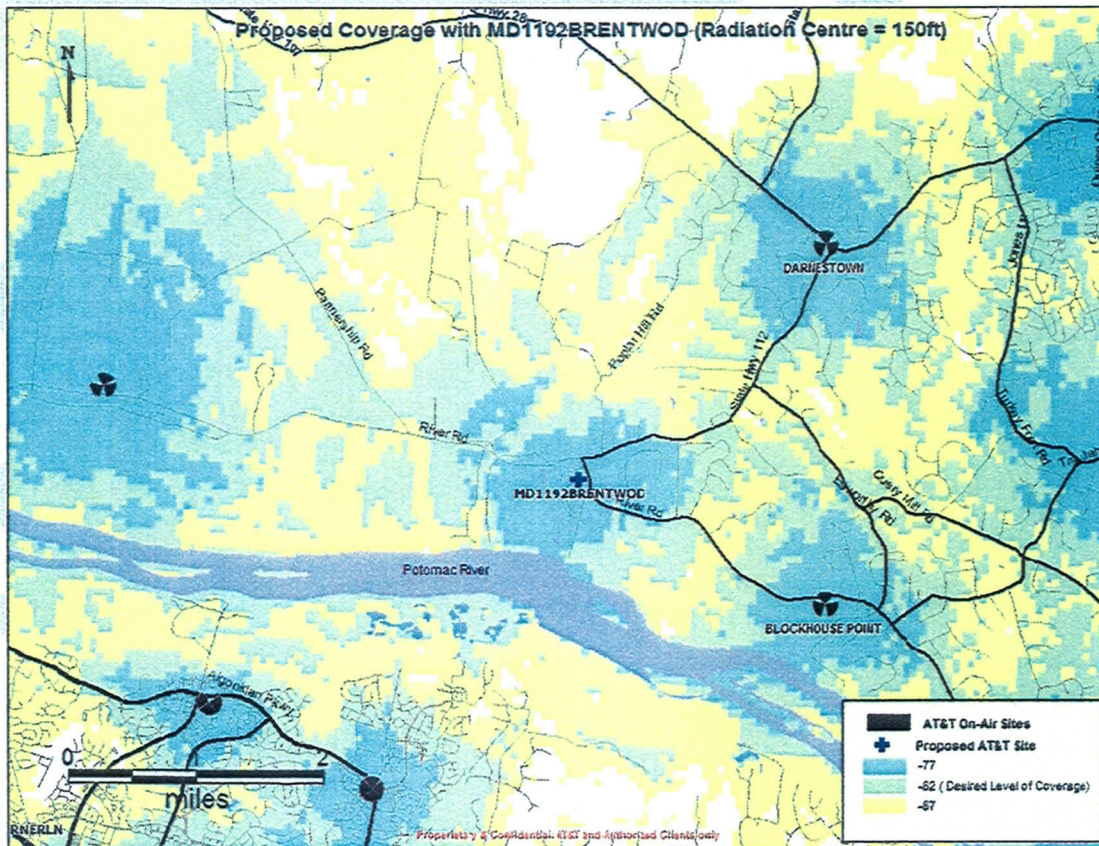


Figure 2: Coverage from Proposed Site

12/6/1966

BOARD OF APPEALS
for
MONTGOMERY COUNTY

Case No. 2114

PETITION OF INTERNATIONAL MONETARY FUND
(Hearing held November 17, 1966)

OPINION OF THE BOARD

This proceeding was on a petition for a Special Exception under Section 104-29. n. of the Zoning Ordinance to permit the construction and operation of a recreational area, including a swimming pool, baseball and soccer field, field house, golf shop and golf course, located on approximately 282 acres of land of which the International Monetary Fund is the contract purchaser. The subject property is bounded by the C & O Canal and Potomac River, River Road, Violets Lock Road, and the Riley Lock Road, in Montgomery County, Maryland, in an R-A Zone.

From the testimony and evidence adduced at the time of the public hearing, the Board makes the following findings of fact and conclusions:

The International Monetary Fund was granted by the Articles of Agreement which were formulated by the United Nations Monetary and Financial Conference held at Bretton Woods, New Hampshire, on July 1-22, 1944, where it was signed by twenty-nine governments, representing 80% of the original quotas of the Fund; that the main objective of the International Monetary Fund is to promote a freer system of world trade and payments as a means of helping its members to achieve economical growth, higher levels of employment and improved standards of living; that there are presently 105 member nations, including the United States of America; and that the Fund is in no way an agency of the United States Government, nor is the proposed project in any way supported by Federal funds.

The purpose of purchasing the 282 acre tract of land is for the use of members of the Fund, and that said use of a recreational area is necessary because most of the members of the Fund come to America with their families and desire that recreational facilities be made available for them while in Washington, D. C., or its adjoining suburbs.

A golf course engineer testified:

- A. That the proposed site was uniquely adapted for an 18-hole golf course because of its topography and

the abundant acreage whereon an 18-hole golf course could be located without crowding and without constituting a nuisance because of noise, traffic or number of people or type of physical activity.

- B. That there is presently a pond upon the property and because of the contours thereon, additional ponds can be built and, in addition, ~~wells can be~~ wells can be dug in order to obtain water for the proposed field house, swimming pool and golf shop.
- C. That the golf course would be more than appropriately landscaped, and that plans called for various holes to have plantings from various countries affiliated with the Fund, and that the landscaping would be for screening purposes in addition to aesthetic ones, and that plans do not call for the construction of any fence along the boundaries of the property.
- D. That the Dulles Interceptor has made it possible for a sewer line to be upon the property in the foreseeable future, and the Fund proposes to give to the Washington Suburban Sanitary Commission necessary easement rights in return for the right of the Fund to tap into the sewer. Meanwhile, suitable septic systems will be installed to meet the County requirements and to serve the needs of the proposed structures.
- E. That the stream running toward the river parallel to Violets Lock Road would be dammed, which would not effect its flow upstream from the property.
- F. That no lighting is calculated to become a nuisance, and no loud speakers or amplifiers or stadiums are contemplated being constructed or used, and the parking area will be made adequate, and in order to conform with the rustic design of the golf shop and field house, the parking area will be of an appropriate substance other than macadam.

The architect testified:

- a. That the swimming pool complex would include a main swimming pool of 25 by 50 meters, a wading pool, both will meet all the County requirements, and will have a lounging deck, bath house and a pavilion with a vending machine area, and that the buildings will be constructed of stone and brick with wood shingle roofs. The deck area will be a combination of concrete and flagstone.
- b. That a field house will be constructed of stone and brick with a wood shingle roof and will include men's and women's rest rooms with shower equipment, storage, snack bar and outdoor fireplace, and will generally serve the users of the athletic field and family picnic groups.
- c. That the golf building will include an entrance lounge, grill, administration room, appropriate locker rooms and shower facilities, and a display area for the golf professionals. It will accommodate approximately 200 golfers and have a maximum of 140 men's lockers and 50 lockers for women. Construction of the field house, the swimming pool complex and the other minor structures will begin as soon as possible with a view to putting them in use for the summer season of 1967. All the buildings will be one-story in height and will be constructed of approximately the same material in an effort to achieve a rustic atmosphere. Each complex will have an independent septic and well system until sewer and water become available on the site.

The attorney for one of the adjoining property owners on the Violets Lock Road pointed out that under a provision of the Bretton Woods agreement, the applicant enjoyed immunity and requested that the Fund waive the same, but the Fund, by its attorney, indicated it would not be able to waive this immunity. Testimony was given that the Fund has conformed to the law in every country into which its operations reach and that it was the intention of the Fund to conform to the law as indicated by the filing of the subject petition.

It was stipulated by the attorney for the Fund that the Fund recognized it would receive services from the County for fire and police protection, and that by purchasing the 282 acres, it took the same off of the Montgomery County tax rolls, but that the Fund

wanted to pay for the services received and would negotiate with the proper authorities of the County to arrange for proper compensation for the services received.

An adjacent property owner of twenty-four acres adjoining the property expressed concern about depletion of subterranean water because of the nature of the land. The Fund, through its attorney, indicated that it would comply with all rules and regulations relative to water.

The Fund, through its attorney, indicated that it would abide by all local laws and regulations in regard to the consumption and sale or purchase of intoxicating beverages.

The Board finds that the petition conforms with the views of the Federal Government with respect to the use of the land along the Potomac River, and that it also conforms to the 1964 General Plan of the Maryland National Capital Park and Planning Commission for the area.

The Board further finds that the proposed use will not constitute a nuisance because of noise, traffic, number of people or physical activity, and that the petitioner has met the burden of proof as set forth in Section 104-27 and Section 104-29. n. of the Ordinance.

Accordingly, and in accordance with the testimony and exhibits of record, the Special Exception for the use proposed is granted to the petitioner only, subject to the following conditions:

1. That Petitioner shall, within twenty (20) days from the date hereof, file with the Board of Appeals a formal waiver of the right to claim immunity from any Federal, State or Montgomery County law or regulation pertaining to the use of subject property; and
2. That when and if public sewer and water lines are available for use at subject property, that the proposed facility will be served by same and petitioner shall obtain approval of his plans from the State of Maryland and Montgomery County Health authorities before beginning operations; and
3. The proposed lights shall be geared away from the boundary lines of subject property and directed onto subject property so as to prevent glare to adjoining properties; and

4. Petitioner shall not erect spectator bleachers or viewing stands until the same has been approved by the Board of Appeals prior to the erection and installation of same; and
5. Any alcoholic beverages used in connection with subject facilities shall be purchased from Montgomery County, Maryland, in accordance with the agreement and stipulation of Petitioner at the time of the hearing on subject petition; and
6. That the petitioner shall cause to be recorded among the land records of Montgomery County an easement for storm drainage and sewer facilities to serve the subject property to the north, which is approximately at the location of River Road and Violets Lock Road; and
7. That prior to the installation of public sewer and water the petitioner shall not drill and use well water in a manner that will adversely affect wells and/or availability of well water on or at surrounding or adjacent property owners.
8. Petitioner shall at all times, following the grant of this Special Exception, maintain as a part of the record in this case the name and address of a designated agent of Petitioner who shall be a resident and citizen of Montgomery County with an office address therein representing petitioner so as the same may be contacted or served with process or orders by any Federal, State or Montgomery County body or official.

The Board adopted the following Resolution:

"Be it Resolved by the County Board of Appeals for Montgomery County, Maryland, that the Opinion stated above be adopted as the Resolution required by law as its decision on the above-entitled Petition."

The foregoing Resolution was proposed by Mr. Bernard D. Gladhill and concurred in by Mrs. Helen H. Burkart, Messrs. Charles R. Richey, Chairman, Calvin R. Sanders, Vice Chairman, and Kenneth E. denOuter, constituting all the members of the Board.

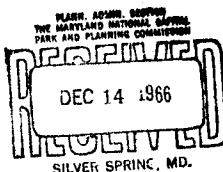
Case No. 1114

I do hereby certify that the foregoing Minutes were officially entered upon the Minute Book of the County Board of Appeals this 6th day of December, 1966.

Sollie H. Korte
Clerk to the Board

NOTE: Please see Section 104-24. c. of the Ordinance regarding the 12-months' period within which the right granted by the Board must be exercised.

This Opinion mailed to all persons who received notice of the hearing.



COUNTY BOARD OF APPEALS
For
MONTGOMERY COUNTY

Case No. 2114

PETITION OF THE INTERNATIONAL MONETARY FUND

MOTION FOR RECONSIDERATION AND MODIFICATION OF OPINION

The Board adopted the following Resolution:

Upon the motion of the Petitioner for a reconsideration and modification of the Opinion of the Board in this case, and the Board having reconsidered the evidence presented at the hearing thereon, and the Board being satisfied that the Opinion of the Board entered upon the Minute Book the 6th day of December, 1966, does not accurately reflect the intention of the Board, it is therefore Resolved as follows:

1. Condition No. 1 be, and the same is hereby, deleted from the Opinion of the Board entered upon the Minute Book the 6th day of December, 1966; and
2. That paragraph 5 on page 4 of said Opinion be, and the same is hereby, amended to read as follows:

"Accordingly, and in accordance with the testimony and exhibits of record, the Special Exception for the use proposed is granted to the Petitioner only, with the understanding that the International Monetary Fund shall observe all laws, rules and regulations of the State of Maryland and of Montgomery County in regard to the use of the subject property, subject to the following conditions:"

3. Condition No. 8 of said Opinion be, and the same is hereby, amended to read as follows:

"Petitioner shall at all times, following the grant of this Special Exception, maintain as a part of the record in this case the name and address of a designated agent of Petitioner who shall be a resident and citizen of Montgomery County, with an office

Case No. 2114

Page 2

address therein, representing Petitioner
so the same may be contacted or receive
notices."

The foregoing Resolution was proposed by Mr. Bernard D. Gladhill and concurred in by Mrs. Helen H. Burkart, Messrs. Charles R. Richey, Chairman, Calvin R. Sanders, Vice Chairman, and Kenneth E. denOuter, constituting all the members of the Board.

Entered upon the Minute Book of the
County Board of Appeals this 9th day
of December, 1966.

Lollie H. Kite
Clerk to the Board



DEPARTMENT OF TECHNOLOGY SERVICES

Isiah Leggett
County Executive

E. Steven Emanuel
Chief Information Officer

September 4, 2008

Allison I. Fultz, Esq - Chair
Board of Appeals, Montgomery County
Council Office Building
100 Maryland Avenue
Rockville, Maryland 20850

Re: Special Exception – AT&T/15700 River Road, Germantown
TFCG Application #200806-22 Bretton Woods

Dear Ms. Fultz:

This is to advise you that the Transmission Facility Coordinating Group (TFCG) reviewed the subject TFCG application on August 6, 2008. For your information, I have attached a copy of the material reviewed by the TFCG, the Tower Coordinator's Recommendation, excerpts from the minutes of the meeting at which the application was reviewed, and a copy of the Record of Action taken by the group.

Should you have any questions regarding this matter or need additional information please feel free to give me a call at 240-777-3724.

Sincerely,

Marjorie Williams
Acting TFCG Chairperson

Enclosures
cc: carrier

\\Mc-Tower\Special Exception_MR Ltrs\AT&T Bretton Woods_200806-22_090408.doc

Excerpt from August 6, 2008 TFCG Meeting Minutes
Application #200806-22

Action Item: AT&T application to construct a new 155' monopole on the Bretton Woods Golf Course property located at 15700 River Road in Germantown (Application #200806-22).

Bob Hunnicutt summarized the application noting that Next G has installed for Sprint a DAS system that is routed along Seneca and River Roads adjacent to the property proposed by AT&T. He said he had asked AT&T why they could not use that DAS system and noted AT&T had replied that since that system was built for another carrier they could not use it. He said he had noted that based on the NextG application filed for Sprint, other carriers could use the fiber optic cables to attach other antennas to other utility poles, but AT&T declined to pursue use of that DAS network.

Mr. Hunnicutt noted that, based on his site visit, there were few locations where the monopole may be seen because of the terrain and many tall trees in the area surrounding the property. He noted that the residents across the street from the property would have the most visible view of the monopole.

Motion: Steve Batterden moved the application be recommended conditioned on the applicant being granted a Special Exception for the monopole by the Board of Appeals. Kim Mayo seconded the motion and it was unanimously approved.



MONTGOMERY COUNTY, MARYLAND
TRANSMISSION FACILITY COORDINATING
GROUP
RECORD OF ACTION

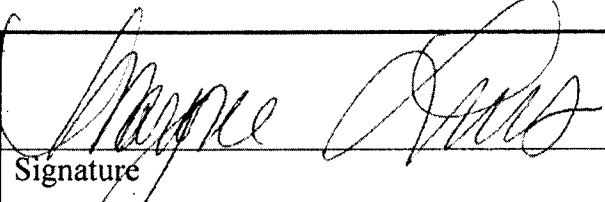
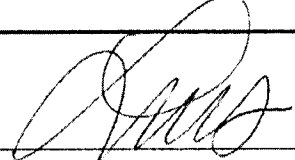
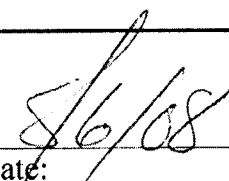
APPLICATION NUMBER: 200806-22

DATE: 6 August 2008

Application Review:	
Applicant:	AT&T Wireless
Description:	Construct a 155' high monopole and attach nine 54' high panel antennas at the 150' level.
Site Location:	Bretton Woods Golf Course 15700 River Road, Germantown
Property Owner:	International Monetary Fund
Group Comments:	

TFCG Action
Recommended <input type="checkbox"/> Not recommended <input type="checkbox"/> Recommended with Conditions <input checked="" type="checkbox"/>
Recommendation conditioned on: Applicant being granted a Special Exception for the monopole by the Board of Appeals

Vote on recommendation of approval:	For: 5	Against: 0	Abstain: 1
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Signature		Date: 8/6/08



MONTGOMERY COUNTY, MARYLAND
TOWER COORDINATOR
RECOMMENDATION

APPLICATION NUMBER: 200806-22

DATE: 15 May 2008

Application Information:		
Applicant:	AT&T Wireless	
Description:	Construct a 155' high monopole and attach nine 54' high panel antennas at the 150' high level.	
Site Location:	Bretton Woods Golf Course 15700 River Road, Germantown	
Property Owner:	International Monetary Fund	
Classification in accordance with Zoning Ordinance: R-C		
Private Property:	<input checked="" type="checkbox"/>	By right: <input type="checkbox"/>
Public Property:	<input type="checkbox"/>	Mandatory Referral: <input type="checkbox"/>
		Minor Modification <input type="checkbox"/>
		Special Exception: <input checked="" type="checkbox"/>
		Special Exception Modification: <input type="checkbox"/>
Impact on land-owning agency: N/A		
Existing or future public safety telecommunications facilities and plans: N/A		
<p>Co-location options: The applicant reports that there are no existing structures to which the antennas could be placed. Based on our site visit we agree. There is however, a distributed antenna system (DAS) which has been installed by Next G (TFCG #200704-24) to provide coverage in the same general area as the AT&T application.</p> <p>To interconnect the DAS, NextG constructed a fiber optic network along Seneca Road and River Road. We questioned AT&T regarding the use of DAS technology in lieu of constructing the monopole. AT&T responded that they had met with NextG and determined the DAS was designed for Sprint/Nextel and was not compatible with the AT&T network requirements. Based on our review of the NextG application (copy of our recommendation is attached for reference), it is our understanding that although the system was designed for Sprint/Nextel and it uses a different technology for cellular coverage than a typical monopole which places antennas at a height sufficient to cover a wide area from a single location, the DAS fiber optic network can also be used by carriers to link antennas designed for the radio spectrum on different poles (than used by Sprint) along the fiber optic route as long as they provide the hub equipment and antennas. While there appears to be adequate spare fiber capacity in the fiber optic cables along Seneca and River Roads to support AT&T, they have advised us that they will not further consider use of the DAS technology in this area. Accordingly, we have no basis to further comment on that as an alternative to a new monopole.</p> <p>Once constructed, the monopole is designed to accommodate antennas from at least two other carriers.</p> <p>Implications to surrounding area: The site is situated on the property near Violettes Lock Road, a designated Rural Rustic Road and we were asked by Planning Commission staff to ask the applicant indicate on the plans the distance the from that road as well as if the Darnestown Citizens Association has been advised of the proposal. We also asked if the</p>		

United States Park Service has been advised of the proposal to place the monopole near their property along the C&O Canal. With past TFCG applications along River Road, there has been interest by the TFCG in also knowing if the Park Service has objections to the proposal. The applicant reports that those matters will be addressed by others as part of the overall process of siting the monopole.

We also asked the applicant to provide revised plans that show the distance to the nearest off-site dwelling but the applicant did not provide that information to us.

Based on our site visit and the plans submitted with the application the monopole is proposed to be constructed amid a stand of pine trees adjacent to the swim club parking lot and between the swim club pool area and a nearby residence for one of the club's staff members. Behind the site for the monopole there is a wooded area that extends to near River Road. The trees appear to be in the range of from 60' to 75' high.

Based on the photo simulations that were provided with the application, the monopole will be visible from the clubhouse area as well as other locations on the property. However, since the monopole is designed to be disguised as a tree, the impact may be minimized.

Based on our observation of a balloon test on July 18, the top of monopole may also be visible to residents across River Road from the site, from the intersection of Seneca Road and River Road, and perhaps to some residents along Signal Tree Lane approximately a mile from the site (see attached photos). However, the visual impact may be minimized by the distance of the monopole from those locations and that it will be disguised as a tree. Other than those areas, it is likely that the monopole may not be seen from other locations off of the Bretton Woods property due to the many tall trees in the vicinity and the hilly terrain of the area around the site for the monopole.

Attachments: Application

Comments: The initial application was for a 160' high monopole. After we advised the applicant that the County's most recent zoning ordinance text amendment for special exceptions (59-G-2.58) limited the maximum height for a monopole is 155' high unless it could be demonstrated that additional height was needed for service, colocation, or public safety purposes, the applicant changed the proposed height to 155' with antennas at the 150' level.

AT&T submitted RF contour maps illustrating the calculated coverage with and without antennas at the 160' 150' and 140' height above ground. The applicant declined to our request for maps with antennas at 20' and 40' below the proposed elevation of 155' as required by the application requirements. The applicant stated reason for not providing those maps is that "as the 140' elevation provides unacceptable coverage, AT&T's engineers will not analyze coverage at lower levels."

The stated coverage objective for this site is to improve service to the motorists and residents near River and Seneca Roads, the surrounding vicinity and Seneca Creek State Park and Bretton Woods Recreational Center.

Based on our review of the map illustrating existing coverage, we agree that there is a need to improve coverage in those areas to bring signals to the stated target level of -82dB.

Based on our review of the calculated coverage illustrated with antennas at the 160' level, coverage for approximately a half mile around the site and slightly farther to the northwest along Partnership Road appears to meet the target signal levels. Areas beyond that appear to be little different than what exists today without the proposed antennas, including most of the Seneca State Park area to the west of the site.

We found that the map illustrating coverage with antennas at the 150' elevation was based on a site for the antennas that appeared to be approximately 1,500' to the northwest of the proposed site. We asked for a corrected map which was provided and the coverage was significantly different than the original map. It appears that antennas at the 150' level may cover approximately the same area at the target signal levels as with antennas at the 160' level.

Based on our review of the RF contour maps illustrating the calculated coverage with antennas at the 140' high level, it appears that the area covered at the target levels is shown to be perhaps half of what is shown with antennas at the 150' level and does not appear to provide the target signal levels to some areas to the northwest along Seneca Road that may be otherwise met with antennas at the 150' level.

None of the RF maps submitted appear to improve signal levels from what is presently shown to be, to the target signal strength for the Seneca State Park area west of the site past Violets Lock Road. This may be due to the terrain which rises to higher levels beyond Seneca Creek and diminishes signals in that direction.

Equipment will be placed in a 50' x 50' area at the base of the monopole enclosed within an 8' high wooden fence.

Tower Coordinator Recommendation:

Recommended: ☐

Recommended with conditions: ☒

Not recommended: ☐

Conditions: Recommendation conditioned on being granted a special exception by the Board of Appeals.

Signature

Date

[Handwritten Signature]

7/30/08



MONTGOMERY COUNTY, MARYLAND
APPLICATION FOR WIRELESS COMMUNICATIONS
SITE COORDINATION

JUN 27 2008

DATE: _____

NUMBER: 200806-22

(To be filled in by County)

Applicant Name: **AT&T Mobility (New Cingular Wireless PCS, LLC) REVISED 6/18/2008**

DBA: **AT&T Mobility**

Address: **7150 Standard Drive, Hanover, MD 21076**

Contact Person **Hillorie S. Morrison, Network Building & Consulting**
and Phone No.: **443-570-0014**

AT&T proposes building a 155' high telecommunications facility at Bretton Woods, disguised as a tree. Antennas for up to four carriers will be installed among the branches of the "tree." A 50' x 50' compound at the base of the tree will accommodate related equipment for the carriers. The compound will be surrounded by a twelve foot high board-on-board fence.

Address/City: **15700 River Road, Germantown, MD 20874 (Bretton Woods Country Club)**

Site Name: **Brentwood**

Zoning: **RC**

Site Owner/Landlord: **International Monetary Fund SAME AS SITE ADDRESS**

Structure Owner: **AT&T Mobility**

Latitude/Longitude (NAD27 degrees/minutes/seconds: **39 04 34.371/77 10 41.035**

Ground Elevation AMSL in feet: **293.7**

Antenna Height AGL in feet: **160' centerline**

Frequency bands to be used: Rx **824.04-834.99, 845.01-846.48, 1870-1885, 1905-1910** Tx **869.879.99,890.01-891.48, 1950-1965, 1985-1990**

Maximum Effective Radiation Power (ERP): **40 watts per antenna**

Federal Communication Commission (FCC) Emission Designator: Cellular-A, A', A" Bands – **KNKA243-(824.04-834.99/ 869.04-879.99, 845.01-846.48/890.01-891.48)**

PCS-B band- **KNLF220 (1870-1885, 1950-1965) & C5 Band – WPZY690 – (1905-1910, 1985-1990)**

FCC Antenna Structure Registration Number: **N/A**

Description of antenna(s), including physical size, patterns, gain and orientation (include copy of spec sheet or drawings): Cellular-A, A', A" Bands – **KNKA243-(824.04-834.99/ 869.04-879.99, 845.01-846.48/890.01-891.48)**
PCS-B band- **KNLF220 (1870-1885, 1950-1965) & C5 Band – WPZY690 – (1905-1910, 1985-1990)**

Describe area to be served by the proposed installation. Attach a map of the general area showing the location of the site. Upon request, attach RF propagation studies showing service area coverage surrounding the proposed site with and without the proposed site. **The area to be served is south of Darnestown and north of the Potomac River. This is an area where the existing coverage is very poor. The site is proposed to service the motorists and residents near River Road and Seneca Road and the surrounding area. The site will benefit users of the recreational facilities are Seneca Creek State Park and Bretton Woods Recreational Center.**

Will antennas be installed on an existing structure? **No**

If not, describe results of investigation about possible co-location. Include a listing of alternative sites considered and an explanation as to why each possible alternative was not selected. If a site was ruled out because of radio frequency (RF) issues, provide RF propagation maps documenting inadequate coverage: **AT&T first sought an existing structure for co-location but none was available. AT&T considered DAS but the coverage objectives were not met. The surrounding area is rural and includes hundreds of acres of parkland.**

Justification of why this site was selected: **The site was selected because it is well centered between existing rings and because a tree pole can blend with the existing use of the property.**

Will site be used to support government telecommunications facilities or other equipment for government use? **The tree pole can be made available for government installations.**

If yes, describe:

Attach a site plan of the proposed facility showing location of monopole, tower, or structure on the property, location of existing and proposed equipment buildings or cabinets, and distance of any new structures or buildings from property lines and other buildings or residences within 300 feet. Clearly identify existing versus proposed facilities by carrier. Also provide an elevation sketch of the structure showing major dimensions, existing attachments, and mounting height of proposed antennas. If a balloon test has been performed, please provide copies of the photographs.

Will the antenna installation be in compliance with the maximum permissible RF exposure limits set forth in §1.1310 of the FCC Rules and Regulations? Yes ☒ No ☐

If the answer is no, please attach an explanation.

Type of compliance study required under §1.1307 of the FCC Rules and Regulations:

Categorically Excluded ☐

Routine Environmental Evaluation ☒

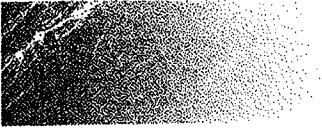
Environmental Assessment ☐

If antennas will be located on a rooftop, please attach a description of any steps that have been or will be taken to prevent the aggregate RF from exceeding exposure limits. **N/A**

Montgomery County Code, Chapter 2-58E requires applicants to submit a facility location plan indicating the location of every existing telecommunications transmission facility and the general location of facilities that are anticipated to be built in the near future. Has a new or updated plan been filed with the County within the last year? Yes ☒ No ☐ If the answer is no, please submit a plan with this application.

If an application for an FAA review has been submitted or an FAA determination has been issued, please attach a copy.

Submit the application fee, with a copy of this Application Form, to:



JUL 14 2008

July 10, 2008

Mr. Robert Hunnicutt
Columbia Telecommunications Corporation
10613 Concord Street
Kensington, MD 20895

Subject: AT&T Brentwood 15700 River Road

Dear Mr. Hunnicutt:

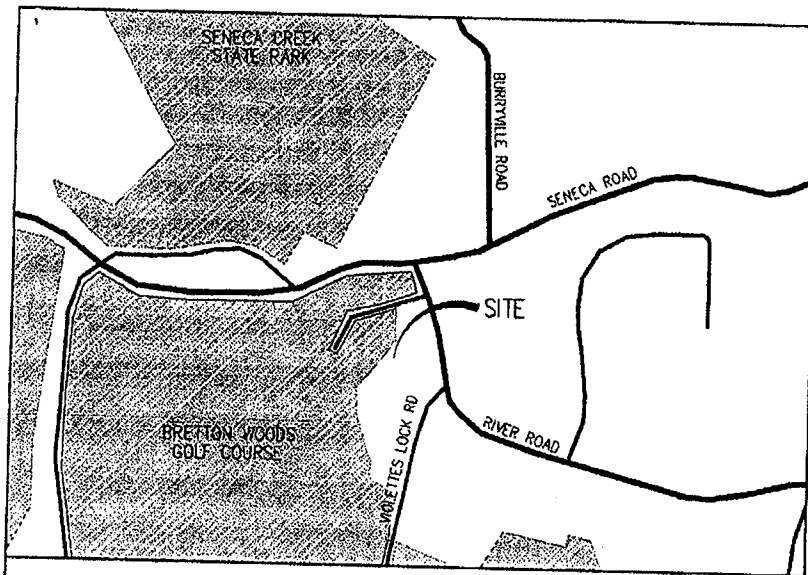
I am responding to your June 25 comments on the AT&T Application for a 155' high tree pole at 15700 River Road.

1. I already transmitted hard and soft copies of the revised application and the revised plans, showing a tree pole height of 155 feet with a radiation center (RC) of 150 feet.
- 2a. The coverage maps show a significant difference in coverage between 140 foot and 150 foot elevation. The 140 foot elevation will not meet AT&T's needs. You have requested contour maps at the 115 and 135 foot levels. As the 140 foot elevation provides unacceptable coverage, AT&T's RF engineers will not analyze coverage at lower elevations.
- 2b. The AT&T RF Manager for Montgomery County met with NextG representatives. NextG's system is designed for one carrier. The company explained that it is not possible to co-locate the AT&T system on the same DAS. AT&T's coverage objective, which includes a large, non-linear gap in coverage, can be met with the tree pole site. AT&T is not giving further consideration to a DAS for this area.
- 2c. Enclosed are copies of the photos showing the balloon test, with the actual balloon. The photos were taken at points where the tree pole would be visible. There would be less visibility one mile from the site.
- 2d. No drive tests were conducted for the site.
- 2e. AT&T is licensed by the FCC. As part of the FCC requirements, AT&T is required to notify the Maryland Historical Trust and all interested parties as part of the Section 106 programmatic agreement. The "SHPO" process has not been completed for this site but will be completed prior to licensure by FCC.

Sincerely,



Hillorie S. Morrison
Senior Land Use Consultant



VICINITY MAP
SCALE: 1" = 2000' - 0"



GRAPHIC SCALE



(IN FEET)
1 inch = 500 ft

entrex
communication services, inc.
1575 Eye Street, N.W. Suite 350
WASHINGTON, D.C. 20005
PHONE: (202) 408-0960
FAX: (202) 408-0961

PROJECT NUMBER:

1072.917

BRENTWOOD • BRETTON WOODS COUNTR
10011258_461G1192
15700 RIVER RD.
GERMANTOWN, MD 20874

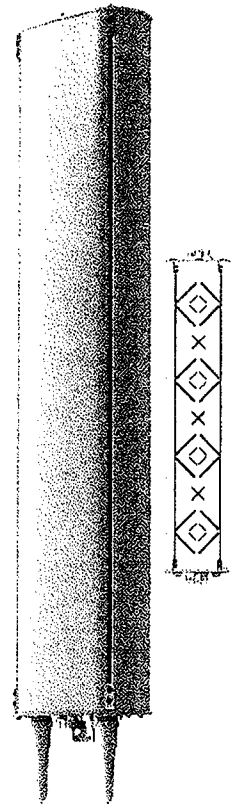
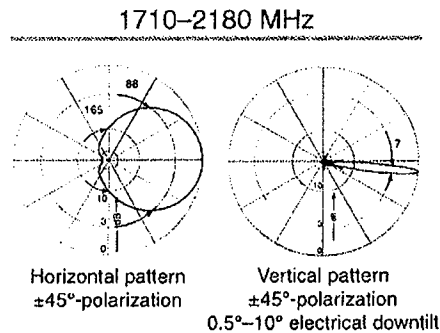
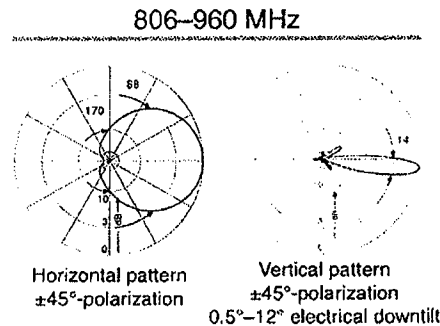
Kathrein's dual band antennas are ready for 3G applications, covering all existing wireless bands as well as all spectrum under consideration for future systems, AMPS, PCS and 3G/UMTS. These cross-polarized antennas offer diversity operation in the same space as a conventional 800 MHz antenna, and are mountable on our compact sector brackets.

- Wide band operation.
- Exceptional intermodulation characteristics.
- Remote control ready.
- Various gain, beamwidth and downtilt ranges.
- AISG compatible.
- High strength pultruded fiberglass radome.

General specifications:

Frequency range	806–960 MHz 1710–2180 MHz
VSWR	<1.5:1
Impedance	50 ohms
Intermodulation (2x20w)	IM3: -150 dBc
Polarization	+45° and -45°
Connector	4 x 7/16 DIN female
Isolation	intrasytem intersystem
	>30 dB >45 dB (806–960 // 1710–2180 MHz)
Weight	44.1 lb (20 kg)
Dimensions	54.5 x 10.3 x 5.9 inches (1384 x 262 x 149 mm)
Equivalent flat plate area	5.58 ft ² (0.518 m ²)
Wind survival rating*	120 mph (200 kph)
Shipping dimensions	67.6 x 12 x 8 inches (1716 x 304 x 204 mm)
Shipping weight	48.5 lb (22 kg)
Mounting	Fixed mount options are available for 2 to 4.6 inch (50 to 115 mm) OD masts.

See reverse for order information.



Specifications:	806–866 MHz	824–896 MHz	880–960 MHz	1710–1880 MHz	1850–1990 MHz	1920–2180 MHz
Average gain (dBi)	13.4 13.4 13.1	13.6 13.6 13.4	13.9 13.8 13.5	16.4 16.4 16.2	16.4 16.5 16	16.4 15.9 15.3
Tilt	0.5° 6° 12°	0.5° 6° 12°	0.5° 6° 12°	0.5° 5° 10°	0.5° 5° 10°	0.5° 5° 10°
Front-to-back ratio	>23 dB (co-polar)	>23 dB (co-polar)	>23 dB (co-polar)	>23 dB (co-polar)	>23 dB (co-polar)	>23 dB (co-polar)
Maximum input power	250 watts (at 50°C)	250 watts (at 50°C)	250 watts (at 50°C)	200 watts (at 50°C)	200 watts (at 50°C)	200 watts (at 50°C)
+45° and -45° polarization horizontal beamwidth	88° (half-power)	86° (half-power)	88° (half-power)	82° (half-power)	85° (half-power)	90° (half-power)
+45° and -45° polarization vertical beamwidth	15° (half-power)	14.5° (half-power)	13.5° (half-power)	7.1° (half-power)	6.8° (half-power)	6.5° (half-power)
Electrical downtilt continuously adjustable (manual or optional remote control)	0.5°–12°	0.5°–12°	0.5°–12°	0.5°–10°	0.5°–10°	0.5°–10°
Sidelobe suppression for first sidelobe above horizon average	0.5° 6° 12° T 16 16 16 dB 17 17 19 dB	0.5° 6° 12° T 16 16 16 dB 17 17 19 dB	0.5° 6° 12° T 14 14 13 dB 17 16 16 dB	0.5° 5° 10° T 17 17 16 dB 20 20 18 dB	0.5° 5° 10° T 17 18 16 dB 21 22 17 dB	0.5° 5° 10° T 18 16 16 dB 20 20 16 dB
Cross polar ratio (typical)						
Main direction	0°	0°	0°	0°	0°	0°
Sector	±60°	±60°	±60°	±60°	±60°	±60°
average	>10 dB >16 dB	>10 dB >16 dB	>13 dB >19 dB	>10 dB >17 dB	>12 dB >19 dB	>10 dB >19 dB

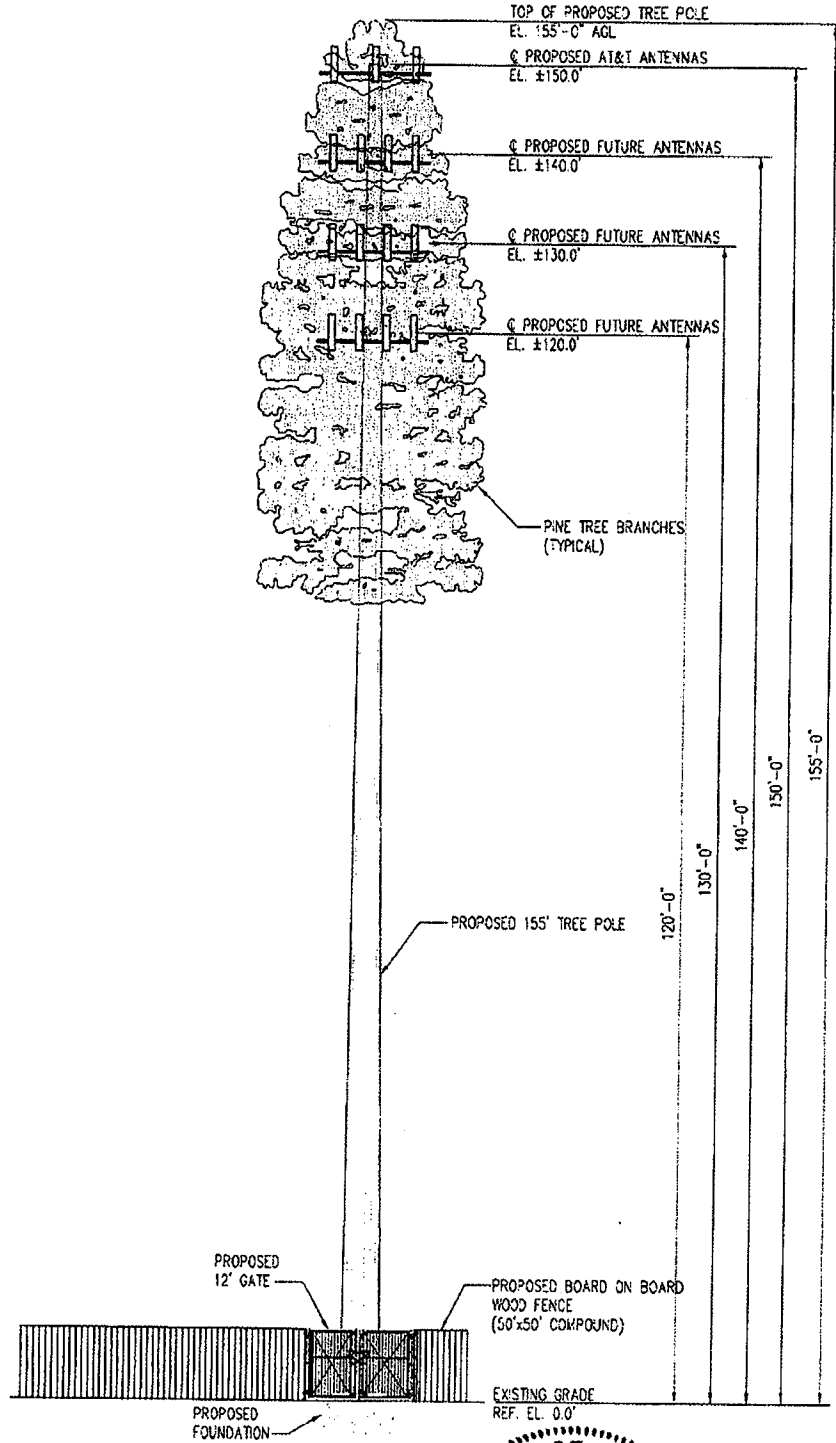
* Mechanical design is based on environmental conditions as stipulated in EIA-222-F (June 1996) and/or ETS 300 019-1-4 which include the static mechanical load imposed on an antenna by wind at maximum velocity. See the Engineering Section of the catalog for further details.



10724-C
936.A2017/I

PROPOSED
UNDGROUN
POWER

PROPOSED
SIDE GATE



TREE POLE ELEVATION
SCALE: 1"=20'-0"

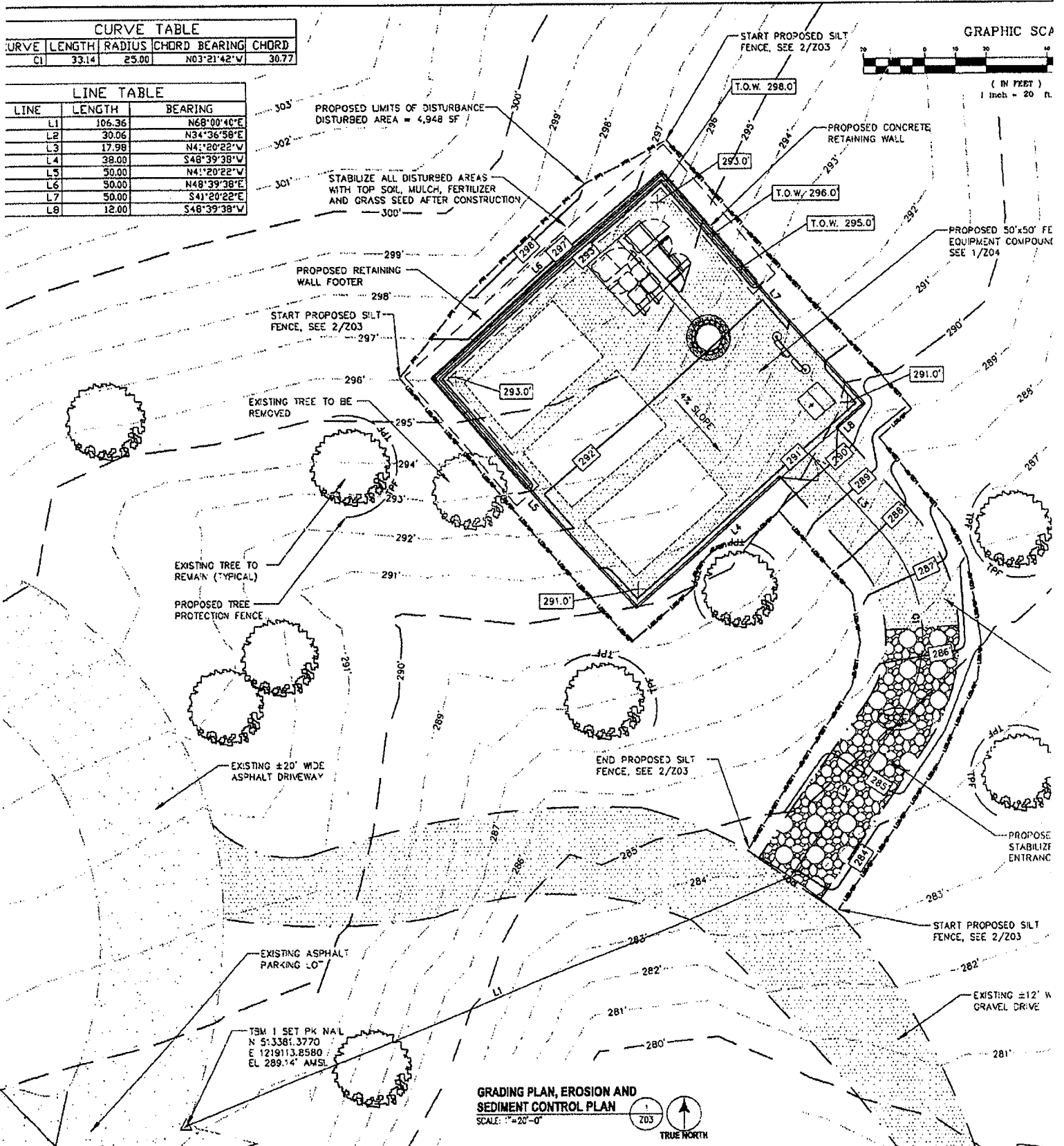
at&t
10 STANDARD DRIVE
BLOOMINGDALE, MD 21076

NO.	DATE	REVISIONS	BY	CHK	APPD	JOB NO.	DRAWING NUMBER
1	06-05-08	ZONING	NB	CG	CG	24782-432	Z04
0	05/08/08	ZONING	NB	CG	CG		
A	05/01/08	ZONING REVIEW	RS	CG	CG		
SCALE: AS SHOWN	DESIGNED: R.S	DRAWN: C.G.					

COMPOUND PLAN
AND TREE POLE ELEVATION

CURVE TABLE				
CURVE	LENGTH	RADIUS	CHORD BEARING	CHORD
C1	33.14	25.00	N03°21'42"V	30.77

LINE TABLE		
LINE	LENGTH	BEARING
L1	106.36	N68°00'40"E
L2	30.06	N34°36'58"E
L3	17.98	N41°20'22"V
L4	38.00	S48°39'38"V
L5	50.00	N41°20'22"V
L6	50.00	N48°39'38"E
L7	50.00	S41°20'22"E
L8	12.00	S48°39'38"V



entrex
communication services, inc.
1575 Eye Street, N.W. Suite 350
WASHINGTON, D.C. 20005
PHONE: (202)408-0960
FAX: (202)408-0961

PROJECT NUMBER:

1072.017

BRENTWOOD - BRETTON WOODS COUNTRY CLUB

10011258_461G1192

15700 RIVER RD.
GERMANTOWN, MD 20874

at&t
7150 STANDARD DRIVE
HANOVER, MD 21076

LINE TYPES

BOUNDARY LINE - PARENT PARCEL

UNSURVEYED LINE - BOUNDARY OF ADJOINERS

TIE LINE FOR DIMENSIONS

EASEMENT BOUNDARY

RIGHT OF WAY BOUNDARY

EDGE OF ASPHALT

EDGE OF GRAVEL

CURB

FENCE LINE - CHAIN

1' CONTOUR LINE

5' CONTOUR LINE

OVERHEAD UTILITY LINE

TREE OR VEGETATION LINE

(E) UNDERGROUND
TELCO SERVICE

EXISTING ASPHALT DRIVEWAY

PROPOSED UNDERGROUND
TELCO FEED TO SITE

EXISTING ASPHALT PARKING LOT

EXISTING SNACK BAR

EXISTING CHANGING ROOMS BUILDING

PROPOSED UNDERGROUND
POWER FEED TO SITE

NEW PEPCO POLE

EXISTING TREE (TYPICAL)

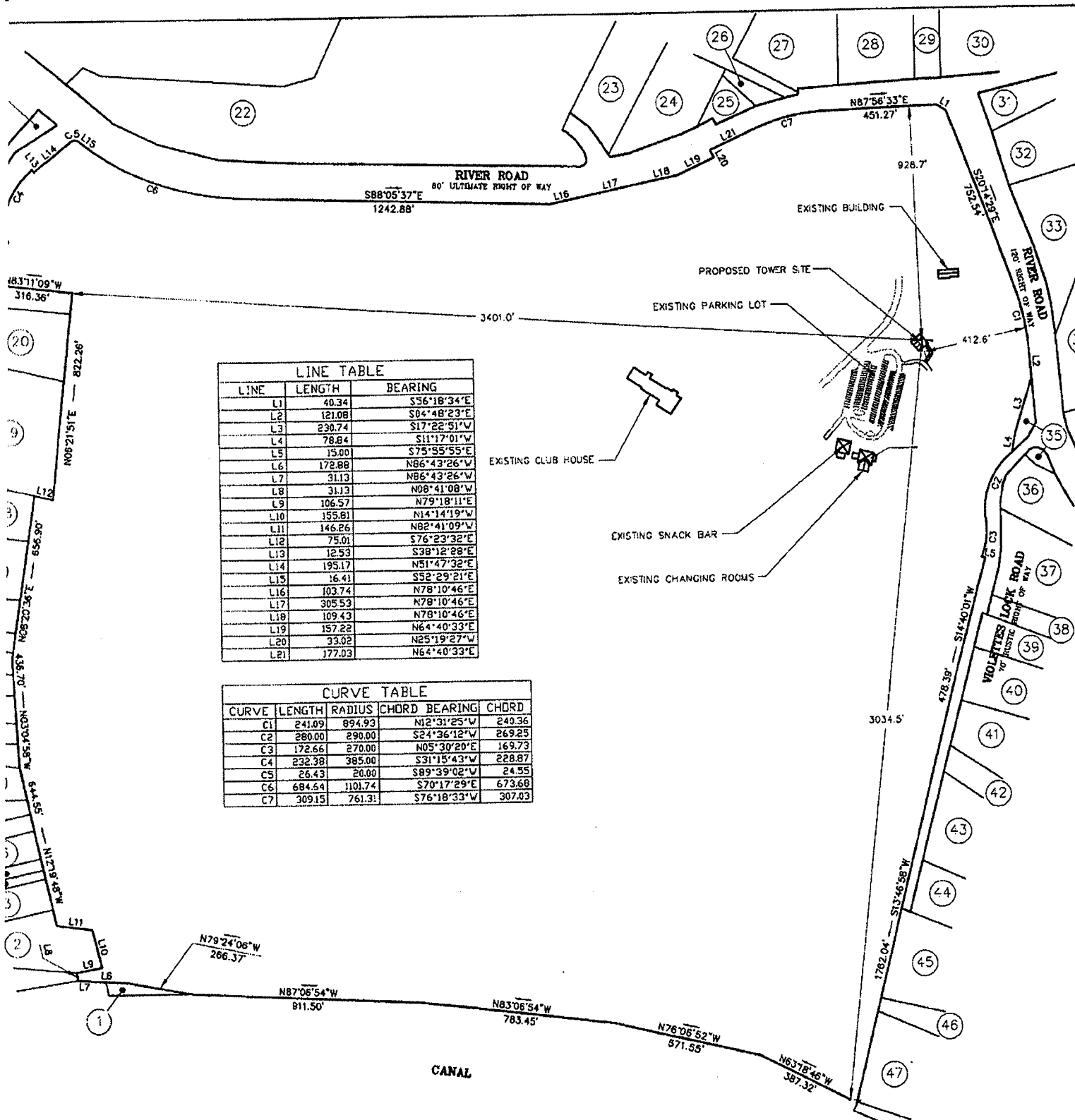
SITE SURVEY
SCALE: 1"=80'-0"



BRENTWOOD - BRETTON WOODS COUNTRY CLUB
10011258 461G1192
15700 RIVER RD.
GERMANTOWN, MD 20874

at&t
7150 STANDARD DRIVE
HANOVER, MD 21076

NO.	DATE	REVISIONS
1	06-05-08	ZONING
0	05/08/08	ZONING
A	05/01/08	ZONING REVIEW
SCALE: AS SHOWN	DESIGNED: R.S	

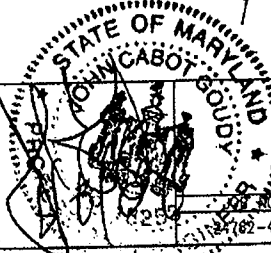


SITE SURVEY
SCALE: 1"=300'-0"



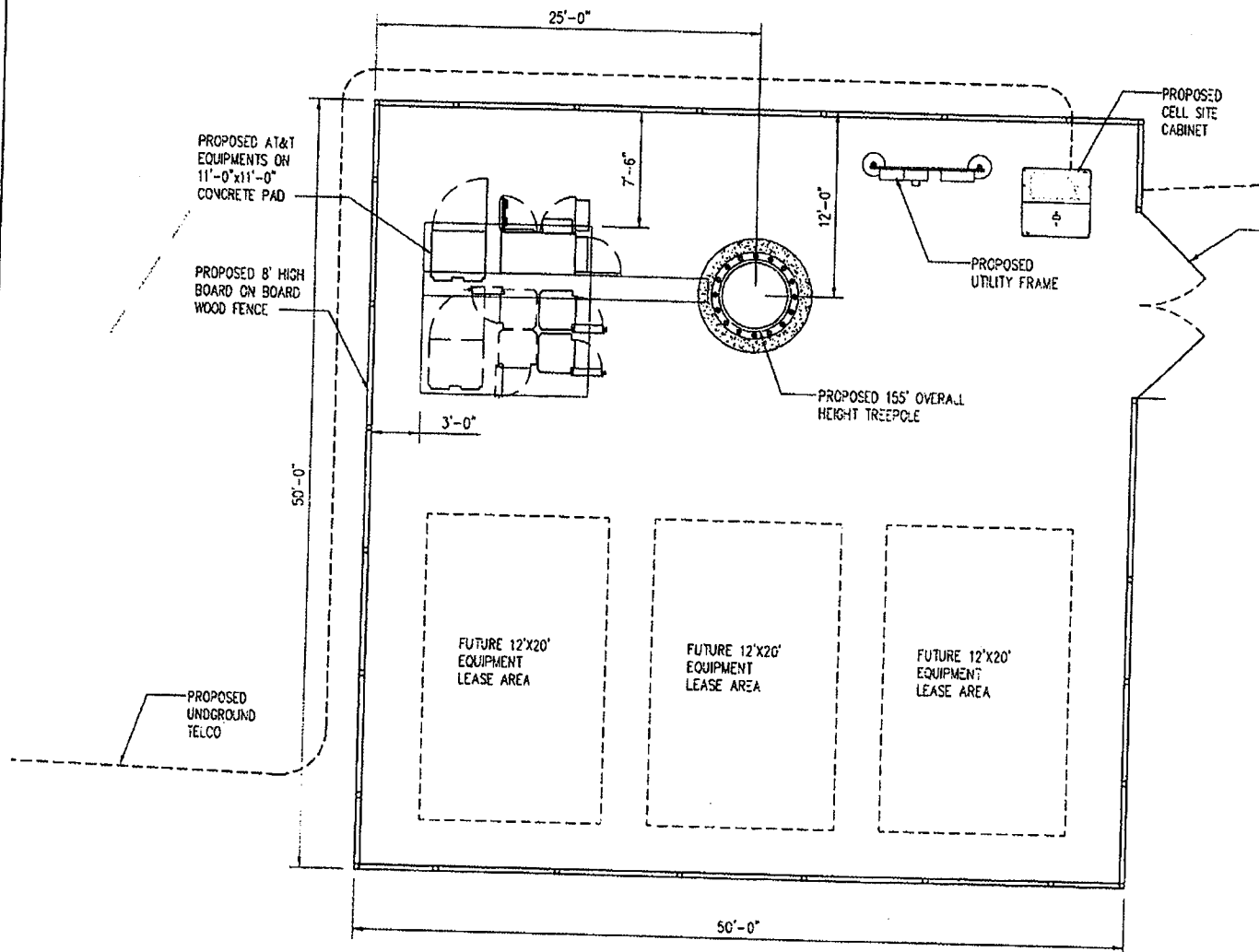
at&t
7150 STANDARD DRIVE
HANOVER, MD 21076

1	06-05-08	ZONING	NB	CG	CG
0	05/08/08	ZONING	NB	CG	CG
A	05/01/08	ZONING REVIEW	RS	CG	CG
NO.	DATE	REVISIONS	BY	CHK	APPD
SCALE: AS SHOWN		DESIGNED: R.S.	DRAWN: C.G.		



PROPERTY PLAT

DRAWING NUMBER
202A



COMPOUND LAYOUT
 SCALE: 3/32"=1'-0"



TRUE NORTH

entrex
 communication services, inc.
 1575 Eye Street, N.W. Suite 350
 WASHINGTON, D.C. 20005
 PHONE: (202) 468-0960
 FAX: (202) 468-0981

PROJECT NUMBER:

1072.017

BRENTWOOD - BRETTON WOODS COUNTRY CLUB
10011258_461G1192
 15700 RIVER RD.
 GERMANTOWN, MD 20874

22 § 286g**FOREIGN RELATIONS Child**

or the Bank in accordance with the Articles of Agreement of the Fund or the Articles of Agreement of the Bank, the Fund or the Bank as the case may be, shall be deemed to be an inhabitant of the Federal judicial district in which its principal office in the United States is located, and any such action at law or in equity to which either the Fund or the Bank shall be a party shall be deemed to arise under the laws of the United States, and the district courts of the United States shall have original jurisdiction of any such action. When either the Fund or the Bank is a defendant in any such action it may, at any time before the trial thereof, remove such action from a State court into the district court of the United States for the proper district by following the procedure for removal of causes otherwise provided by law.

(July 31, 1945, c. 339, § 10, 59 Stat. 516.)

CROSS REFERENCES

Removal from State to district court, see 28 USCA § 1441 et seq.

LIBRARY REFERENCES

American Digest System
Federal Courts § 79.
United States § 131 to 132.
Key Number System Topic Nos. 170B, 393.

Research References

Forms
Federal Procedural Forms § 32:1, Scope of Division.
Federal Procedural Forms § 32:12, Scope of Division.
Federal Procedural Forms § 32:23, International Monetary Fund; International Bank for Reconstruction and Development.
Federal Procedural Forms § 32:26, Allegation in Complaint Jurisdiction Based on Membership in International Bank or Other Agency. (22 U.S.C.A. §§ 283f, 284f, 285f, 286g; Fed R Civ P Rule 8(A)(1)).

Treaties and Practice Aids

Federal Procedure, Lawyers Edition § 36:251, International Monetary Fund; International Bank for Reconstruction and Development.
Wright & Miller: Federal Prac. & Proc. § 3571, Banks and Other Corporations.
Wright & Miller: Federal Prac. & Proc. § 3721, Removal Jurisdiction-In General.

WESTLAW ELECTRONIC RESEARCH

See WESTLAW guide following the Explanation pages of this volume.

§ 286h. Status, privileges, and immunities of the United States

The provisions of article IX, sections 2 to 9, both inclusive, and the first sentence of article VIII, section 2(b), of the Articles of Agreement of the Fund, and the provisions of article VI, section 5(i), and article VII, sections 2 to 9, both inclusive, of the Articles of Agreement of the Bank, shall have full force and effect in the United States and

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Child INTERNATIONAL ORGANIZATIONS**22 § 286j**

territories and possessions upon acceptance of membership by the United States in, and the establishment of, the Fund and the Bank, respectively.

(July 31, 1945, c. 339, § 11, 59 Stat. 516.)

LIBRARY REFERENCES

American Digest System
International Law § 10:45(2).
Key Number System Topic No. 221.

Research References

Forms
Federal Procedural Forms § 32:1, Scope of Division.
Federal Procedural Forms § 32:12, Scope of Division.

WESTLAW ELECTRONIC RESEARCH

See WESTLAW guide following the Explanation pages of this volume.

§ 286i. Stabilization loans by Bank; amendment to Articles of Agreement

The governor and executive director of the Bank appointed by the United States are directed to obtain promptly an official interpretation by the Bank as to its authority to make or guarantee loans for programs of economic reconstruction and the reconstruction of monetary systems, including long-term stabilization loans. If the Bank does not interpret its powers to include the making or guaranteeing of such loans, the governor of the Bank representing the United States is directed to propose promptly and support an amendment to the Articles of Agreement for the purpose of explicitly authorizing the Bank, after consultation with the Fund, to make or guarantee such loans. The President is authorized and directed to accept an amendment to that effect on behalf of the United States.

(July 31, 1945, c. 339, § 12, 59 Stat. 516.)

LIBRARY REFERENCES

American Digest System
International Law § 10:45.
Key Number System Topic No. 221.

WESTLAW ELECTRONIC RESEARCH

See WESTLAW guide following the Explanation pages of this volume.

§ 286j. Use of fund resources**Official interpretation of authority of Fund**

The governor and executive director of the Fund appointed by the United States are directed to obtain promptly an official interpretation

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Articles of Agreement of the International Monetary Fund

Article IX - Status, Immunities, and Privileges

Section 1. Purposes of Article

To enable the Fund to fulfill the functions with which it is entrusted, the status, immunities, and privileges set forth in this Article shall be accorded to the Fund in the territories of each member.

Section 2. Status of the Fund

The Fund shall possess full juridical personality, and in particular, the capacity:

- (i) to contract;
- (ii) to acquire and dispose of immovable and movable property;
and
- (iii) to institute legal proceedings.

Section 3. Immunity from judicial process

The Fund, its property and its assets, wherever located and by whomsoever held, shall enjoy immunity from every form of judicial process except to the extent that it expressly waives its immunity for the purpose of any proceedings or by the terms of any contract.

Section 4. Immunity from other action

Property and assets of the Fund, wherever located and by whomsoever held, shall be immune from search, requisition, confiscation, expropriation, or any other form of seizure by executive or legislative action.

Section 5. Immunity of archives

The archives of the Fund shall be inviolable.



MONTGOMERY COUNTY PLANNING BOARD
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

OFFICE OF THE CHAIRMAN

November 23, 2009

The Honorable Dominique Strauss-Kahn
Managing Director
International Monetary Fund
700 19th Street, N.W.
Washington, D.C. 20431

Re: Proposed Telecommunications Facility
15700 River Road, Germantown, Maryland 20874

Dear Dr. Strauss-Kahn:

The purpose of this correspondence is to request that the International Monetary Fund continue the pursuit of its plans to construct a telecommunication facility on the Bretton Woods Property through the special exception process. The Fund filed a petition for special exception for this purpose on December 10, 2008, but subsequently withdrew it claiming to be exempt from the process.

In addition to ensuring that the proposed structure is suitable for the location, the special exception process also provides the community with the opportunity to express its support, or concerns, as the case may be. If you will recall, in 1966, the Fund followed the special exception process for the original development of the Bretton Woods golf course. The utilization of this process evinced respect for local expectations and substantially contributed to the Fund's reputation as a good neighbor.

I hope the Fund will continue to consider the community's standards as it contemplates the proposed changes to its Bretton Woods facility.

Should you determine that this matter requires additional discussion or detail, please do not hesitate to contact me. Thank you for your kind consideration in this regard, I am

Very truly yours,


Royce Hanson
Chairman



INTERNATIONAL MONETARY FUND

WASHINGTON, D.C. 20431

Facsimile Number
1-202-623-4661

March 10, 2009

The Honorable Royce Hanson
Chairman, Montgomery County Planning Board
Maryland National Capital Parks and Planning Commission
8787 Georgia Avenue
Silver Spring, MD 20910

Dear Mr. Chairman:

Pursuant to Article 28 ¶7-112 of the Annotated Code of Maryland, the International Monetary Fund ("IMF") requests Mandatory Referral Review by the Montgomery County Planning Board, acting as the Maryland National Park and Planning Commission, of a proposed telecommunication project (the "Project") to be constructed on IMF's property located at 15700 River Road (the "Property").

The proposed Project involves the installation of a wireless telecommunication facility to be constructed and operated by New Cingular Wireless PCS, LLC (AT&T Mobility). Copies of the site drawings are attached for your review.

As you may be aware, Article IX of the Articles of Agreement of the International Monetary Fund, as incorporated into the laws of the United States and the State of Maryland by the Bretton Woods Agreements Act (22 United States Code Section 286h), provides that the International Monetary Fund, its property and its assets, wherever located and by whomsoever held, are immune from every form of judicial process. Article IX, Section 6 specifically provides that "to the extent necessary to carry out the activities provided for in this agreement, all property and assets of the IMF shall be free from restrictions, regulations, controls, and moratoria of any nature." Copies of the relevant sections of the IMF Articles of Agreement and U.S. Code are attached.

The IMF considers reliable wireless communications an important service for its operations. Such reliable service does not currently exist on the Property and its surrounding areas. Accordingly, it is in the interest of the IMF, and the general public that the planned wireless telecommunication project proceed.

Please undertake to have the Mandatory Referral Review process initiated and completed in a timely manner, including any public hearing which the Commission deems appropriate. Our

point of contact will be AT&T Mobility's counsel, James R. Michal, Esq. of Jackson & Campbell, P.C. TEL: (202) 457-1652, FAX: (202) 457-1625.

Thank you for your attention to this request.

Very truly yours,

A handwritten signature in cursive script that reads "George Brookings".

George Brookings
Assistant Director
Technology and General Services Department

Attachments (2)

September 1, 2010

Ms. Marybeth O'Quinn
Senior Planner
M-NCPPC
8787 Georgia Avenue
Silver Spring, MD 20910

**Re: Mandatory Referral – Proposed Telecommunications Facility on
International Monetary Fund Property at 15740 River Road**

Dear Marybeth:

Per your request, I am providing the following chronology of contacts to various persons/groups relating to the proposed telecommunications facility on the IMF property located at 15740 River Road.

1. Telephone calls with Michael Weill, NCPC, Lynne Wigfield/Scott Bell, NPS, Sarah Navid, Rustic Road Advisory Committee and George Barnes, West Montgomery Citizen Association, during the period June 1, 2010 – July 31, 2010, relating to the proposed facility.
2. Email to Lynne Wigfield, NPS on June 9, 2010 with site documentation.
3. Email to George Barnes on June 16, 2010 with site documentation.
4. Meeting with Michael Weill, NCPC at his office and provide site documentation.
5. Letter dated July 9, 2010 to Anne Sturm, President of Sugarloaf Citizen Association with site documentation.
6. Emails to Leslie Saville, MNCPPC; Sarah Navid, Rustic Road Advisory Committee, Lynne Wigfield/Scott Bell, NPS, Michael Weill, NCPC, and George Barnes, West Montgomery Citizen Association relating to the initial scheduled balloon test for July 8, 2010.
7. Emails to Leslie Saville, MNCPPC; Sarah Navid, Rustic Road Advisory Committee, Lynne Wigfield/Scott Bell, NPS, Michael Weill, and NCPC, George

Ms. Marybeth O'Quinn
September 1, 2010
Page 2

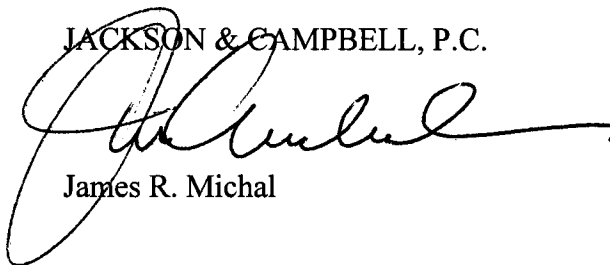
Barnes, West Montgomery Citizen Association relating to the rescheduled balloon test on July 24, 2010.

8. Emails on August 25, 2010 to Scott Bell, NPC and Michael Weill, NCPC requesting any further comment.

In addition to the foregoing, I have made known my availability to all interest groups for any further information.

Very truly yours,

JACKSON & CAMPBELL, P.C.

A handwritten signature in black ink, appearing to read "James R. Michal", is written over the printed name. The signature is fluid and cursive, with a large loop at the beginning and end.

James R. Michal



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MEMORANDUM:

DATE: September 21, 2010

TO: Marybeth O'Quinn
Urban Design Division

FROM: Ki H. Kim, Planner/Coordinator
Transportation Planning Division *KKH*

SUBJECT: Mandatory Referral No: 10716-IMF-1
Bretton Woods Cell Tower
Rural West Policy Area

SEP 21 2010

This memorandum is Transportation Planning staff's Adequate Public Facilities (APF) review of the subject mandatory referral application. The proposed installation of the telecommunication facility (monopole) in the IMF property will not increase the number of weekday peak period trips generated by the site. Therefore, no Local Area Transportation Review is required. The site is located in Rural West policy area where the Policy Area Mobility Review does not require any trip mitigation. Staff finds that the proposed installation of the telecommunication facility under the subject mandatory referral application will have no adverse effect on area roadway conditions.

KK:tc



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

August 16, 2010

Scott McMillan
700 19th Street NW
Washington, D.C. 20431

RE: Natural Resources Inventory/Forest Stand Delineation (NRI/FSD) 42011014E
Cellular Facility on IMF River Road Property

Dear Mr. McMillan:

This letter is to inform you that your request for an exemption from submitting a forest conservation plan 42010204E is approved under section 22A-5(f) of the Montgomery County Forest conservation Law.

Any changes from the approved exemption request may constitute grounds to rescind or amend any approval actions taken and to take appropriate enforcement actions. If there are any subsequent modifications planned to the approved plan, a separate amendment must be submitted to M-NCPPC for review and approval prior to those activities occurring.

If you have any questions regarding these actions, please feel free to contact me at 301-495-4546 or joshua.penn@mncppc-mc.org.

Sincerely,

Joshua Penn
2010.08.16
09:02:12 -04'00'

Josh Penn, Senior Planner

Cc: NRI/FSD 42011014E



Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor
John R. Griffin, Secretary
Joseph R. Gill, Deputy Secretary

June 22, 2010

Mr. Brian Bartell
Ecotone, Inc.
PO Box 5
1204 Baldwin Mill Rd.
Jarrettsville, MD 21084

RE: Bretton Woods Cell Tower Site
FCA #C11-01

Dear Mr. Bartell:

I received your letter dated June 15, 2010, requesting an exemption from the requirements of the Maryland Forest Conservation Program for the Bretton Woods Cell Tower project in Montgomery County, Maryland. Because this project disturbs less than 40,000 square feet:

This project is not subject to the requirements of the State Forest Conservation Program.

If you have any questions, please contact me at 410-836-4568.

Sincerely,

A handwritten signature in black ink that reads "Tod Ericson". The signature is written in a cursive, flowing style.

Tod Ericson
Urban & Community Forester



MONTGOMERY COUNTY PLANNING DEPARTMENT

THE MARYLAND NATIONAL CAPITAL PARK AND PLANNING COMMISSION

To: Mary Beth O'Quinn, Urban Design and Historic Preservation Division
 From: Scott Whipple, Historic Preservation Section
 Date: September 16, 2010
 Re: Mandatory Referral No10716-NCPS-1: IMF
 Bretton Woods Country Club Communications Tower
 15700 River Road, Germantown

Background:

The installation site is located within the Seneca National Register Historic District. As a result, the applicant may be required to initiate a review under section 106 of the National Historic Preservation Act consistent with the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission.

The site of the proposed installation, at 15700 River Road, Germantown, is not designated in the Master Plan for Historic Preservation or identified in the Locational Atlas. Therefore, the Historic Preservation Commission has no regulatory role under Chapter 24A of the County Code. However, the Historic Preservation Section notes that the following Master Plan (MP) and Locational Atlas (LA) historic resources are within an approximately one mile radius of the proposed installation:

- Seneca Store (MP#17/62)
- Upton Darby House (MP#17/61)
- Montevideo (MP#17/58)
- Seneca Quarry (MP#17/50)
- Riley's Lock House & Lock #24 (MP#24-26)
- Seneca Aqueduct, and Violettes Lock (MP#24/27)
- Quarry Master's House (LA#17/54)
- Overseer's House at Montevideo (LA#17/59-1A)
- Seneca Stone School (LA#17/56-1A).

Recommendation:

If communications requirements cannot be met through the co-location of this facility on an existing installation, the Historic Preservation section would recommend that the installation employ an alternative stealth technology in place of a stealth tree design, preferably a narrow/slim monopole with internal antennas, painted a neutral color such as brown or grey to mitigate any impact on historic sites and resources and their broader setting.

TELECOMMUNICATION TOWER PROPOSAL AND EXAMPLES

The descriptive language of telecommunication design is not entirely self-explanatory, so a brief survey of the types, with illustrations, follows.

In this application, AT&T proposes a **cellular tree pole tower** as they have illustrated at the right:

This is an existing **130' tree pole** at Avenel (right). These poles can fit into the landscape in some instances, but they can be difficult to disguise in deciduous forests such as those in Montgomery County, where the towers are taller than the surrounding trees, and where large native evergreens are unusual.



Monopoles form the working core of the cellular tree pole. Without the added branches, they are commonly seen along our highways (I-270 shown here).

Co-location appears as one or several arms below the original installation, as seen here. When reviewing a monopole, co-located antennas are not always shown on the application but should be expected.



This **monopole** is located on River Road, about two miles from the proposed site; the base of the tower is within a native forest, but the top is much higher than the surrounding trees. The tower can be readily seen from about a mile away.



Towers are sometimes disguised as flagpoles. This is the flagpole facility AT&T uses for coverage to the north of the site.

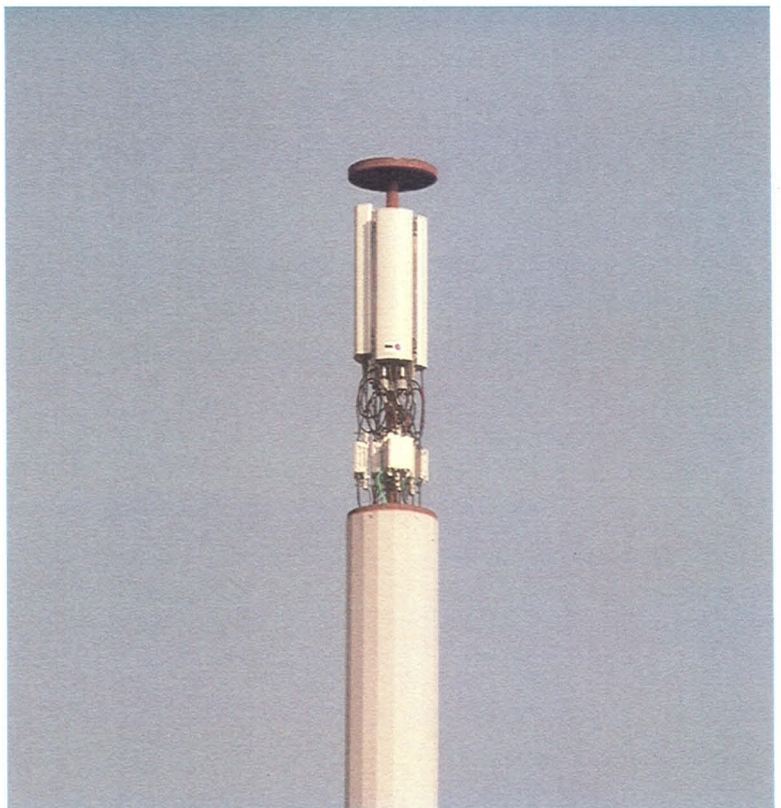
The motion of the flag can draw attention to towers, and the thickness of the pole is considerably in excess of normal flagpoles.



Unipoles are functionally similar but lack the visual drawbacks of flagpole disguises.



Antennas on **unipoles** visually blend with the pole. Unipoles and flagpoles do not have the ability to hold as many antennas at the same height as monopoles can hold; this can result in a taller pole.



This example of a **distributed antenna systems (DAS)** has omnidirectional antennas that can be placed on top of existing or new telephone poles. This one is located on MacArthur Boulevard.

This type of installation currently exists along the road at Bretton Woods; staff recommends co-location with this existing system.



Oquinn, Marybeth

Subject: FW: Cell Tower Proposal Private Golf Course - Bretton Woods corner of Violet's Lock and River Road

From: Caroline Taylor [mailto:caroline@mocoalliance.org]

Sent: Monday, September 20, 2010 4:44 PM

To: Oquinn, Marybeth

Cc: Saville, Leslie; Murray, Callum

Subject: Cell Tower Proposal Private Golf Course - Bretton Woods corner of Violet's Lock and River Road

Dear Ms. O'Quinn,

In reviewing the above referenced application we offer the following specific comments and ask that include them in your decision making process and include them in the record.:

1. The host property is a private golf club and therefore the process should not be rendered a mandatory referral. This is not an application for tower on public ground for public purpose. In fact, the tower as proposed seems to largely serve those recreating on the grounds of the private club. The full special exception process should therefore be undertaken.
2. The proximity to the gateway to the Ag Reserve and National parkland and historic resources dictates the need for additional sensitivity to the protected viewshed in terms of placement and setbacks. This facility presents conflict with the Potomac Subregion Master Plan for this region and with the master plan for preservation of rustic/rural roads.
3. An artificial tree that finds no natural model either in species or height (155') in the subject forest and therefore renders the tower more visible.
4. On over 250 acres of property, is there no better (less visible) location for this tower? Perhaps a location near existing structures further away from roadways would be a better choice.
5. Applicant should be required to explore co-location. There is an existing tower to the west on River Road that may provide co-location opportunity.

Moreover, as we understand that this application represents one of perhaps 10 or more sites that carriers hope to pursue in or near treasured rustic and scenic roadways and resources in or near Montgomery County's nationally recognized Ag Reserve, we offer the following general suggestions and promise our vigilance:

1. The primary land use in the Reserve is agriculture and resource preservation and, as such, facilities such as cell towers represent a potential conflict with the purpose of the rural density transfer (RDT) zone. It is therefore critical that proactive measures be required when siting cell towers, including: **Co-location whenever possible: applicant should be required to demonstrate that they have sought to co-locate with existing facilities and, if this remedy is discounted, rationale should be made public.**
2. Provision should be made that: Facilities shall be disassembled and removed from site within ninety (90) days of the date its use for wireless telecommunications purposes is discontinued. Enforcement of this provision is critical and a financial penalty structure should be established.

3. The utmost care in siting and up-to-date stealth pole technology should be undertaken. Applicant should accept the special conditions and the cost to address them as a necessary part of siting these facilities in a protected area.

Thankyou for taking these comments into consideration.

Respectfully submitted,

Caroline Taylor
Montgomery Countryside Alliance

Dolores Milmo
Audubon Naturalist Society

David Hauck
Montgomery County Sierra Club

Ginny Barnes
West Montgomery Civic Association

Peg Coleman
Sugarloaf Regional Trails

Anne Sturm
Sugarloaf Citizen's Association

Patty Cooper
Historic Medley Association

Bishop Sheehan
Barnesville

Jean Findlay
Dickerson

Diana Conway
Potomac

L.Oakley Johnson
Darnestown

Mike Rubin
Boys

Chris Kendrick
Poolesville

David Bowen
Comus

Caroline Taylor, Executive Director
Montgomery Countryside Alliance
P.O. Box 120, Boyds, Maryland 20841
301-349-5021 ~ 301-461-9831 (c)
<http://mocoalliance.org/>

"Whether we and our politicians know it or not, Nature is party to all our deals and designs, and she has more votes, a larger memory, and a sterner sense of justice than we do." ~ Wendell Berry



MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

October 6, 2010

MEMORANDUM

TO: Mary Beth O'Quinn
Design Division

FROM: ^{CM} Callum Murray, Team Leader, Potomac and Rural Area (301-495-4733)
Leslie Saville, Senior Planner (301-495-2194) ✓
Vision Division

SUBJECT: New Cingular Wireless PCS, LLC, dba AT&T Mobility
Bretton Woods Country Club, 15700 River Road, Germantown
Mandatory Referral
Master Plan Conformance

RECOMMENDATION

AT&T proposes a 155-foot tall "cellular tree pole" tower on the Bretton Woods property. The Potomac Subregion Master Plan provides guidance for special exception uses, and protecting residential communities and historic sites, including the C&O Canal, while the Rustic Roads Functional Master Plan provides guidance for protecting views. To conform to the master plans and for community compatibility, staff recommends an alternative design for this facility; two alternatives are available.

MASTER PLAN CONFORMANCE

Two master plans guide proposals for this property: the 2002 Potomac Subregion Master Plan and the 1996 Rustic Roads Functional Master Plan (RRFMP).

Potomac Subregion Master Plan (2002)

The Bretton Woods property is in the Darnestown community area of the Potomac Subregion Master Plan. It is in the Rural Cluster (RC) zone. The property is surrounded by established residential and agricultural areas, and six parks, including the C&O Canal National Historical Park. It is also located within the Seneca National Register Historic District, and it is surrounded by six sites designated in the Master Plan for Historic Preservation and three sites designated in

Vision Division, 301-495-4555, Fax: 301-495-1304
8787 Georgia Avenue Street, Silver Spring, Maryland 20910
www.MontgomeryPlanning.org

the Locational Atlas.

As described in the Plan Highlights, the Potomac Subregion Master Plan focuses on “new development and redevelopment” that:

- “respect[s] and enhance[s] the Subregion’s environmental quality, while helping to build communities and resources that will serve existing and future generations of residents” (p. 1);
- “protect[s] the Chesapeake & Ohio Canal National Historical Park, major transportation corridors, and residential communities from incompatible design of special exception uses” (p. 2); and
- “protect[s] Potomac’s historic resources, [which] contribute to the area’s unique sense of place” (p. 2)

This master plan provides the following guidance for telecommunications facilities and special exception uses (Special Exception Policy, pp. 35-36):

“This Plan endorses guidelines for locating special exception uses in residential areas and recommends a re-examination of the approval process for telecommunication facilities, particularly monopolies....The Master Plan seeks to provide guidelines that will protect residential areas while also attempting to meet important policy goals.

“Recommendations:

- “Limit the impacts of existing special exceptions in established neighborhoods. Increase the scrutiny in reviewing special exception applications for highly visible sites and properties adjacent to the Chesapeake & Ohio Canal National Historical Park.
- “Avoid an excessive concentration of special exceptions along major transportation corridors.

“Sites along these corridors are more vulnerable to over-concentration because they have high visibility....

- “Protect the Chesapeake & Ohio Canal National Historical Park, major transportation corridors and residential communities from incompatible design of special exception uses.

“In the design and review of special exception uses, the following guidelines should be followed in addition to those stated for special exception uses in the Zoning Ordinance:

- a. “Adhere to Zoning Ordinance requirements to examine compatibility with the architecture of the adjoining neighborhood...
- b. “Parking should be located and landscaped to minimize commercial appearance...
- c. “Efforts should be made to enhance or augment screening and buffering as viewed

from abutting residential areas and major roadways.”

Regarding consistency with the Potomac Subregion Plan Highlights, staff analysis finds the following:

- The proposed tower and compound are located in a relatively small area, and was sited to reduce the loss of existing trees; the applicant has located the facility to minimize the impact on the Subregion’s environmental quality.
- Providing cellular service in this area will serve existing and future residents. Based upon the applicant’s coverage map for a 160-foot tower, the proposed tower may provide in-building coverage for approximately 225 structures, of which about 120 are residences (the balance include Bretton Woods facilities, Poole’s Store and park buildings).
- By the use of a “tree” design, the applicant seeks to protect C&O Canal, transportation corridors and residential communities from incompatible design of special exception uses. As noted in the submission, the existing mature trees are 60 to 80 feet tall, so the proposed “tree” will be 75 to 95 feet taller than the existing trees. A summertime balloon test shows that the tower will be visible from River Road; during the winter, the nearby deciduous trees will lose their leaves and the tower will almost certainly be visible from the C&O Canal, area roads and residential neighborhoods in the vicinity. To reduce the impact on the C&O Canal, nearby roadways and communities, staff recommends co-locating with the existing Distributed Antenna System (DAS) facility or using a unipole or thin pole design instead of a tree.
- This co-location or thin pole design would also address the Plan’s recommendation for protecting Potomac’s historic resources.

Regarding conformance with the Plan’s policy for special exception uses, staff analysis finds the following:

- This proposal in this location should have only limited impacts to the established neighborhoods, and it should receive increased scrutiny because of the adjacent C&O Canal National Historical Park. As above, summertime balloon tests show that the proposed tower will be visible from River Road and the residential area along it; in the wintertime, staff anticipates that it will be visible from the C&O Canal. Staff finds that a thin pole design or co-location with the existing DAS facility would have a lesser impact.
- Current, the applicant has coverage in this area from two monopoles on River Road (see attachment) and a “flagpole” facility on Route 28 at Seneca Road; there is a gap in this location. The most effective way to avoid over-concentration of telecommunications facilities, as directed by the Plan, is through co-location with the existing DAS facility.
- To protect the C&O Canal, major transportation corridors and residential communities from incompatible designs, the least obtrusive design should be used. Staff finds that co-locating with the existing facility is the least obtrusive, followed by a thin pole design.
- The applicable guidelines for design and review relate to screening and buffering; in the event that the applicant cannot co-locate with the existing DAS facility, or use a thin pole design, screening along the River Road frontages will be needed. Staff recommends a staggered double row of native trees from the DOT Approved Major Tree list, planted

40 feet on center or closer.

Rustic Roads Functional Master Plan (1996)

This property is located on River Road with six rustic and exceptional rustic roads abutting the property and in the vicinity:

- Violettes Lock Road (rustic) abuts the property and is about 566 feet from the proposed tower; it provides access to the C&O Canal Park and related historic sites.
- Rileys Lock Road (rustic) abuts the property to the west; it also provides Canal and historic site access.
- Tschiffeley Mill Road (rustic) parallels Rileys Lock Road on the opposite side of Seneca Creek from the property; it too provides Canal and historic site access.
- Old River Road (rustic) is believed to follow a trail established by Native Americans. Now, it connects Tschiffeley Mill Road and the Canal to Poole's Store and the Upton Darby House.
- Montevideo Road (exceptional rustic) has provided access to the Canal from Dawsonville since 1837.
- Berryville Road (exceptional rustic) provided Canal access for the 1810 Montanverde Estate; it currently follows the alignment established in 1879.

The Rustic Roads Functional Master Plan (RRFMP) includes the following guidance on views:

"The views from rustic and exceptional rustic roads are of particular interest. Where the roads go through forest areas, such as within parkland, probably little change will occur. When the roads go through pastures or open views to distant mountains or even through short views to farm fields and stream valleys, any additional building has the potential to destroy such a view. It also has the potential to create and enhance scenic views" (p. 36).

The RRFMP does not restrict development, but rather, it seeks to maintain scenic vistas, where practical, by recommending building placement (p. 36).

Because this site has rustic roads on three sides, a location in the center of the site might best conform to the RRFMP. The Rustic Roads Advisory Committee recommends thin pole designs for telecommunications facilities near rustic roads, and staff agrees that this recommendation reduces the impact on the roads and is consistent with the intent of the Plan.

Rustic Roads Advisory Committee

The applicant has not brought this proposal to the Rustic Roads Advisory Committee (RRAC), but the committee has discussed scenic views in general and cell tower placement and design in specific, and has consistently recommended cell tower designs with internal antennas. Sarah Navid, staff to the committee, has reviewed the plan on behalf of the committee and recommended that the tree design be replaced by a thin pole design with internal antennas. A thin pole or unipole design would be consistent with the RRAC's recommendation.

Community Comments

To date, the comments have been received from staff to the Rustic Roads Advisory Committee and one letter co-signed by multiple groups (Montgomery Countryside Alliance, Audubon Naturalist Society, Montgomery County Sierra Club, West Montgomery Civic Association, and others) and residents with the following points:

- This facility is a private club; the application should follow the special exception procedure
- This is a sensitive location, adjacent to the Ag Reserve, a historic park, and several historic resources
- The proposal conflicts with the Potomac and Rustic Roads Plans
- A 155-foot artificial tree has no native equivalent in this area; it will not look natural and thus will increase the visual impact of the tower
- The tower should be moved away from the roads to reduce the impact
- Co-location consideration should be required

SUMMARY AND RECOMMENDATION

Vision staff finds that the proposed facility would be consistent with the applicable master plans and be compatible with the surrounding community, C&O Canal, historic sites, parks and rustic roads if it were co-located with a Distributed Antenna System, or if it were a thin pole or unipole design. Substantial screening along both River Road frontages will also be needed.

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Saville, Leslie

From: Navid, Sarah [Sarah.Navid@montgomerycountymd.gov]
Sent: Thursday, September 16, 2010 3:03 PM
To: Oquinn, Marybeth
Cc: Saville, Leslie; Murray, Callum
Subject: Bretton Woods Cell Tower

Hi Marybeth,

I recently received an e-mail from the attorney for the proposed cell tower on the Bretton Woods golf course enclosing balloon test photos for Violettes Lock Road. Although the photos did not indicate visibility of the tower from Violettes Lock Road, the closest rustic road to the site; these photos were taken when the leaves were still on the trees. Further, one of the photos included clearly showed the simulated tree "towering" above the tree line. Because this proposed tower is so high (155'), it will not naturally blend in with the existing tree line. In winter, it will look even worse. It would be OK if this was the Pacific Northwest where the evergreen trees are naturally that high. There are several other rustic and exceptional rustic roads besides Violettes Lock Road within visual proximity of the site – Montevideo Road, Old River Road, Tschiffely Mill Road, Rileys Lock Road and Berryville Road. In similar cases, the Rustic Roads Advisory Committee has gone on record recommending a monopole design with internal antennae in an unobtrusive color. I recommend that be used in this case as well. I plan to discuss this item at the next meeting of the Committee on September 28 and will let you know if they have any further recommendation prior to the mandatory referral hearing before the Planning Board in October.

Sarah R. Navid

***Rustic Roads Advisory Committee Coordinator
Department of Permitting Services
255 Rockville Pike, Rockville, MD 20850***

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