



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

#9

MEMORANDUM

DATE: September 6, 2002
TO: Montgomery County Board of Appeals
VIA: John Carter, Chief, Community-Based Planning *JAC*
FROM: *JD* Judy Daniel, AICP, Team Leader, Rural Area

REVIEW TYPE: **Special Exception**
APPLYING FOR: **Telecommunications Facility**
CASE NUMBER: **S-2515**

APPLICANT: Sprint PCS and Realty Equipment Company
ZONE: RDT
LOCATION: 21410 Beallsville Road, Dickerson
MASTER PLAN: Preservation of Agricultural and Rural Open Space
MCPB HEARING: September 12, 2002
BOA HEARING: September 25, 2002

STAFF RECOMMENDATION: APPROVAL with the following conditions:

1. The applicant is bound by all submitted statements and plans.
2. The monopole must be removed at the cost of the applicant when the telecommunication facility is no longer in use by any telecommunication carrier.
3. Approval of a Tree Protection Plan by the Environmental Planning staff prior to release of sediment and erosion control or building permit, as appropriate. An M-NCPPC inspector must be contacted for pre-construction inspection of tree protection measures and authorization to begin any tree clearing.

PROJECT DESCRIPTION: Surrounding Neighborhood

This is an application for a cellular communications tower for Sprint PCS to be located on Beallsville Road, near Beallsville (with a Dickerson mailing address) MD. It is a rural area, near the CSX/MARC rail station at Beallsville. The area is a mix of agricultural and very low density residential uses.

PROJECT DESCRIPTION: Site Description

The subject property is identified as Parcel P907 on Tax Map CV 52, at 21410 Beallsville Road. It consists of 25.05 acres of land in the RDT Zone. The property is located approximately 1/4 mile southwest of the Barnesville MARC train station, 1 1/4 miles from the intersection of Beallsville Road and Big Woods Road.

The proposed facility will be setback approximately 550 feet from Beallsville Road. The portion of the property to be used is heavily forested with trees ranging 80-100 feet in height, although with few large trees. Therefore the chosen site, although in a wooded area, will require few trees to be removed.

Existing structures on the property include the Lloyd residence (located nearest the public road) and farm structures. The proposed site is approximately 390 feet from the closest adjacent property line and over 390 feet from any off-site residence.

PROJECT DESCRIPTION: Proposal

The applicant, Sprint PCS, has requested a special exception to construct a telecommunications facility on the property. The applicant proposes to lease a 60x60 foot portion of property, and the property owners (Terry Hunter Lloyd, Nerissa Bea Lloyd, Frank Hardy Lloyd, and Eric Zachary Lloyd) are co-applicants for the facility.

Sprint proposes to erect a 150-foot high monopole with 9 panel antennas and 6 equipment cabinets set on a 10x20 concrete pad. The facility will be freestanding, and able to accommodate at least 2 additional carriers. The equipment cabinets are approximately 6 feet high x 3 feet wide x 3 feet deep. They are to be contained in a 58 foot x 58-foot gravel compound, surrounded by a 6-foot high chain link fence. The compound is screened by existing forest surrounding the equipment site.

Access to the facility will be via an existing gravel drive from Beallsville Road. In normal operation, there will be periodic visits of one to two times per month to check or repair the equipment.

The application has been reviewed by the Telecommunications Transmission Facilities Coordinating Group (the Tower Committee [TC]), which recommended approval of the facility. The applicant stated in the petition that the proposed site is necessary to provide "seamless coverage" for its Personal Communications Services (PCS) system.

ANALYSIS

Telecommunication facilities are an allowable special exception within the RE-2 zone. A telecommunications facility is defined in Section 59-A-2.1 as "*Any facility*

established for the purpose of providing wireless voice, data and image transmission within a designated service area. A telecommunication facility must not be staffed. A telecommunication facility consists of one or more antennas attached to a support structure and related equipment..."

Master Plan

The Functional Master Plan for the Preservation of Agricultural and Rural Open Space is silent on special exceptions. The RDT Zone allows certain special exceptions including public utility structures.

Transportation

The proposed use is located off Beallsville Road, which is designated as a Rustic Road with an 80-foot right-of-way. There are no major transportation issues related to this special exception since there will be no on-site personnel and only periodic visits to check or repair the equipment. Access to the site will be from a gravel road veering off the main driveway into the property from Beallsville Road.

Environmental

This application is exempt from the Forest Conservation Law. The Natural Resources Inventory (#4-02211E) has been approved. However a Tree Protection Plan must be approved before release of building permits so that nearby trees will be protected from construction equipment.

Historic Preservation

The applicant submitted a letter to the Maryland Historic Trust requesting an evaluation of this site for possible historic concerns. The letter (attached) has a stamp from the Office of Preservation Services of the Maryland Historic Trust, dated June 8, 2001, indicating no concerns with the proposed use.

The M-NCPPC Historic Preservation staff also evaluated the site, since Historic Medley owns an immediately adjacent property. Because the tower would be up the hill, well off the road, and out of people's immediate view at the Medley property or the railroad station, they have no objection. It will unavoidably be in the long-range view, but not in the short-range view at the historic site.

Required Findings for Special Exception

As outlined in the attached full review, the application meets, as much as an intrinsically visually intrusive use can, the standards for a telecommunications public utility use in the zoning ordinance.

Community Concerns

As of the date of this report, the staff has received no comments regarding this application. Notices were sent to adjoining and confronting property owners (including CSX Railroad) and several area citizen groups including the Dickerson-Beallsville Coalition, Sugarloaf Citizens Association, Committee for the Up-County, the Western Upper Montgomery County Citizens Group, and the Northern Montgomery County Alliance.

Inherent and Non-Inherent Effects

Section 59-G-1.2.1 of the Zoning Ordinance provides that:

"A special exception must not be granted absent the findings required by this Article. In making these findings, the Board of Appeals, Hearing Examiner, or District Council, as the case may be, must consider the inherent and non-inherent adverse effects of the use on nearby properties and the general neighborhood at the proposed location, irrespective of adverse effects the use might have if established elsewhere in the zone. Inherent adverse effects are the physical and operational characteristics necessarily associated with the particular use, regardless of its physical size or scale of operations. Inherent adverse effects alone are not a sufficient basis for denial of a special exception. Non-inherent adverse effects are physical and operational characteristics 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 staff believes that the only significant inherent effect for this type of use is that the monopole is tall and thus visible. The mechanical equipment is located within small buildings in fenced compounds that can be easily screened, they rarely require employee visits, and they are accessed via a standard paved drive.

But because of the necessity of the tower, they "inherently" have significant negative visual impact. Given this inherent intrusive visual nature, the object in finding sites for these towers is to find the location which best balances the need to provide service with a site that offers the least visual intrusion upon the fewest area residents.

The staff does not believe there are any significant non-inherent effects for this use at this location because the level of use anticipated will not impact the rural character of this area. The size of the property and infrequency of maintenance access indicate a use with little potential for non-inherent effects or impacts.

Tower Committee Report

The Tower Committee (TC) reviewed this application for a 150-foot tall tower on

May 6, 2002. They established that there are no existing structures that could be used to meet their service requirements. A site visit determined that the site will be somewhat concealed by trees from areas to the north of this site, although it will be visible from the rear of the homes located along the west side of Barnesville Road.

The submitted Radio Frequency (RF) plots show a need for antennas from 120 to 150 feet in height to cover the areas identified. The TC asked Sprint to submit RF plots for this location at 120 feet in height for comparison. These indicated that this height results in a slight reduction of reliable coverage, primarily to the north. In its final analysis the TC was in agreement that the proposed height of 150' appeared to be necessary to ensure the desired coverage.

However, the TC also agreed that a stealth design might be a possibility for this site if a shorter pole is used. The shorter length is necessary because the limitation on the number of antennas used in a "flagpole" design would adversely impact coverage and consequently, tend to diminish the potential interest of other carriers in using the site. Also, the TC felt that a "flagpole" design for a monopole of this height would appear out of place in a rural setting. The Tower Coordinator noted that although no other carriers have yet specifically targeted this area as one in need of coverage in their annual plans, it could undoubtedly be an attractive site for co-location as other carriers expanded their networks into this area.

The TC also noted the location next to what might be a historic building (the MARC commuter rail station) and asked if the Maryland Historical Trust had reviewed the site. The applicant informed the TC that the Trust had reviewed the site and presented the letter with the Maryland Historical Trust approval stamp. The TC ultimately recommended approval of the proposed site, conditioned upon the approval of the Maryland Historical Trust.

CONCLUSION

The staff believes that the proposed special exception satisfies all general and specific requirements for the use found in Sections 59-G-1.21 and 59-G-2.43 of the Zoning Ordinance. However, the staff agrees with the assessment of the Tower Committee that the monopole could be somewhat shorter with little loss of coverage. Consequently, if there are objections to the construction of this monopole from area residents, the staff believes that the applicant will need to present stronger evidence of need for the 150-foot tall pole, since a shorter pole could allow a "stealth" design.

If there is no opposition to this monopole, the staff supports the applicant's proposed 150-foot tall monopole, and approval is recommended with the conditions noted at the beginning of this report.

Attachments

General Conditions

Sec. 59-G-1.21 of the Zoning Ordinance (General Conditions) provides:

(a) A special exception may be granted when the board, the hearing examiner, or the district council, as the case may be, finds from a preponderance of the evidence of record that the proposed use:

(1) Is a permissible special exception in the zone.

The use is so allowed in the RDT Zone.

(2) Complies with the standards and requirements set forth for the use in division 59-G-2.

The use complies with these standards as noted below.

(3) Will be consistent with the general plan for the physical development of the district, including any master plan or portion thereof adopted by the Commission.

The proposed use is not inconsistent with the Master Plan for the Preservation of Agricultural and Rural Open Space (AROS), which is silent in regard to special exceptions.

(4) Will be in harmony with the general character of the neighborhood considering population density, design, scale and bulk of any proposed new structures, intensity and character of activity, traffic and parking conditions and number of similar uses.

The use is no more or less in harmony with the general character of the neighborhood because than any other similar use, as this type of use is inherently visually intrusive.

(5) Will not be detrimental to the use, peaceful enjoyment, economic value or development of surrounding properties or the general neighborhood; and will cause no objectionable noise, vibrations, fumes, odors, dust, glare or physical activity.

This use will have a visual impact on the surrounding neighborhood but will not cause objectionable noise, vibrations or other detrimental physical activity. And it will be no more detrimental to the use, peaceful enjoyment, and economic value of the general neighborhood than any similar use.

(6) Will not, when evaluated in conjunction with existing and approved special exceptions in the neighboring one-family residential area, increase the number, intensity or scope of special exception uses sufficiently to affect the area adversely or alter its predominantly residential nature.

The use will not create a surfeit of special exception uses in the area, and will not alter its predominantly residential nature.

- (7) Will not adversely affect the health, safety, security, morals or general welfare of residents, visitors or workers in the area.

The use will not have such adverse affect on the area or its residents.

- (8) Will be served by adequate public services and facilities including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage and other public facilities.

The existing public facilities are sufficient for the proposed use. Subdivision is not required.

Special Findings for a Telecommunications Facility

Section 59-G-2.43 of the Zoning Ordinance (Public utility buildings, public utility structures, and telecommunication facilities) provides:

- (a) A public utility building or public utility structure, not otherwise permitted may be allowed by special exception. The Board must make the following findings:

- (1) The proposed building or structure at the location selected is necessary for public convenience and service.

The Tower Committee has determined that additional telecommunication service is necessary for public convenience and service and the location is appropriate.

- (2) The proposed building or structure at the location selected will not endanger the health and safety of workers and residents in the community and will not substantially impair or prove detrimental to neighboring properties.

The use will have a visual impact, but it will not endanger the health and safety of area residents. It will have no more detrimental to neighboring properties than any similar use.

- (b) Public utility buildings in any permitted residential zone, shall, whenever practicable, have the exterior appearance of residential buildings and shall have suitable landscaping, screen planting and fencing, wherever deemed necessary by the Board.

The base of the proposed facility will be adequately screened by existing and proposed vegetation but will be partially visible from some adjacent properties especially during the winter months.

- (c) Any proposed broadcasting tower shall have a setback of one foot from all property lines for every foot of height of the tower.

The proposed tower is 150 feet high and is set back from over 300 feet from the property lines on all sides, and thus meets this requirement.

- (d) Examples of public utility buildings and structures for which special exceptions are required under this section are buildings and structures for the occupancy, use, support or housing of switching equipment, or television transmitter towers and stations; telecommunication facilities.

The proposed use is a telecommunications facility.

- (e) The provisions of section 59-G-1.21(a) shall not apply to this subsection. In any residential zone, overhead electrical power and energy transmission and distribution lines carrying in excess of 69,000 volts.

Not applicable for this use.

- (f) In addition to the authority granted by section 59-G-1.22, the Board may attach to any grant of a special exception under this section other conditions that it deem necessary to protect the public health, safety or general welfare.

Recommended conditions are given.

- (g) Petitions for special exception may be filed on project basis.

Not Applicable.

- (h) A petitioner shall be considered an interested person for purposes of filing a request for a special exception if he states in writing under oath that he has made a bona fide effort to obtain a contractual interest in the subject property for a valid consideration without success, and that he intends to continue negotiations to obtain the required interest or in the alternative to file condemnation proceedings should the special exception be granted.

Not Applicable.

- (i) Any telecommunication facility must satisfy the following standards

- (1) The minimum parcel or lot area must be sufficient to accommodate the location requirements for the support structure under paragraph (2), excluding the antenna(s), but not less than the lot area required in the zone. The location requirement is measured from the base of the support structure to the property line. The Board of Appeals may reduce the location requirement to not less than the building setback of the applicable zone if the applicant requests a reduction and evidence indicates a support structure can be located on the property in a less visually unobtrusive location after considering the height of the structure, topography, existing vegetation, adjoining and nearby residential properties, if any and visibility from the street.

The proposed tower is located within the RDT zone, which requires a 1-acre minimum lot size, and the subject site is over 25 acres in size.

- (2) A support structure must be located as follows:

a. In agricultural and residential zones, a distance of one foot from property line for every foot of height of the support structure.

The proposed monopole is 150-feet high, and will retain a minimum 150-foot setback from the property line. The monopole will satisfy this requirement.

b. In commercial and industrial zones.

Not applicable for this use.

- (3) A freestanding support structure must be constructed to hold not less than 3 telecommunication carriers.

The proposed tower is designed to hold three carriers.

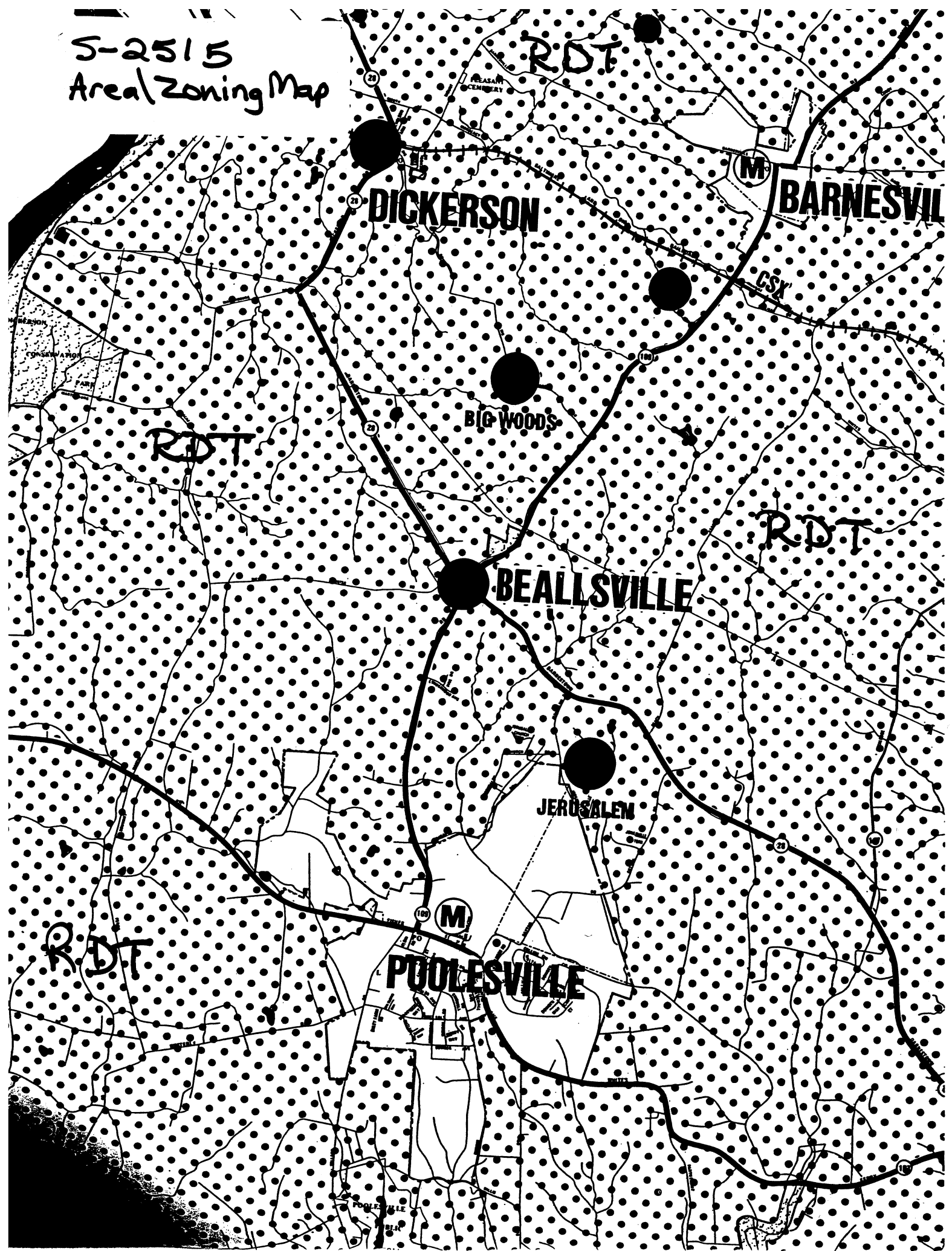
- (4) No signs or illumination are permitted in the antennas or support structure unless required by the Federal Communications Commission, the Federal Aviation Administration, or the County.

No signs or illumination are proposed.

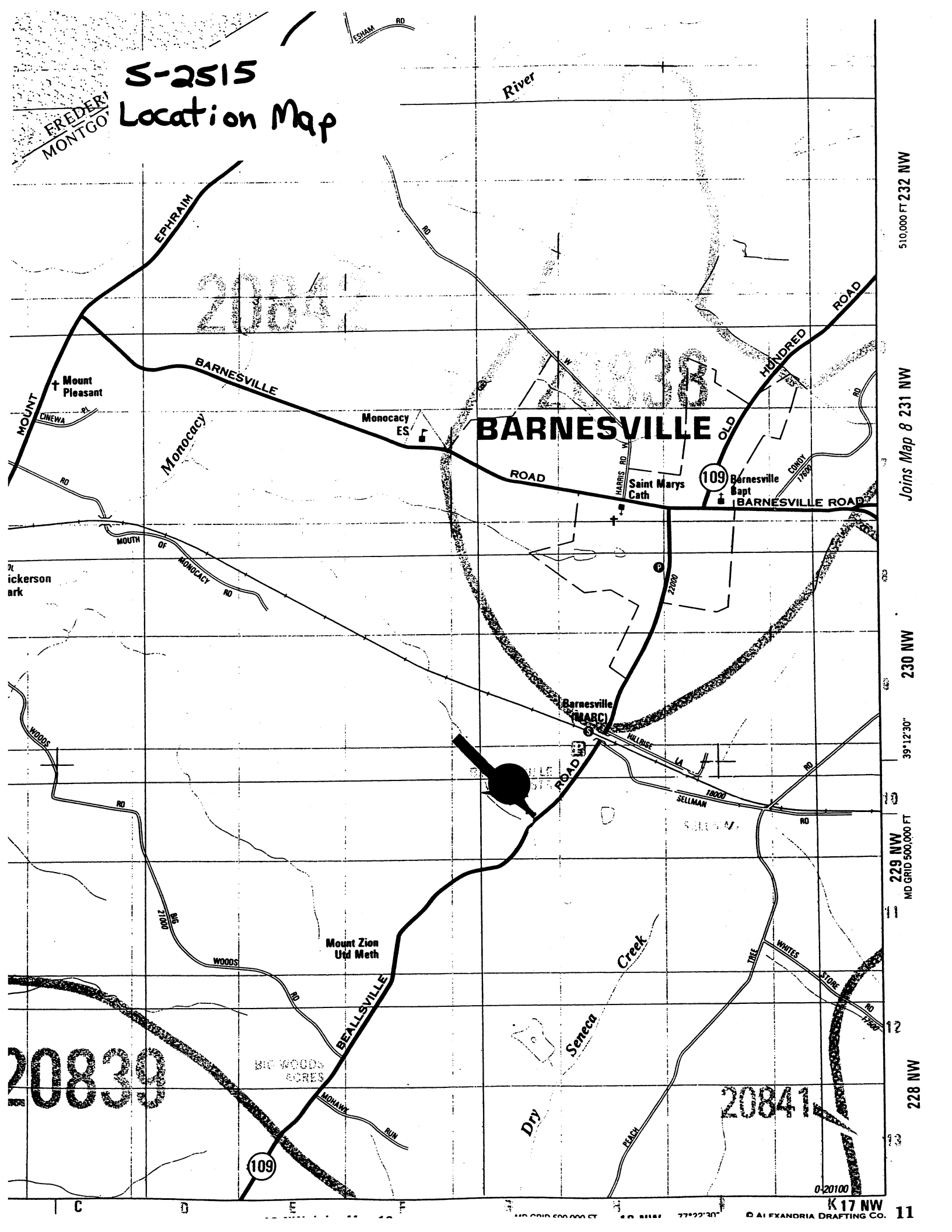
- (5) Every freestanding support structure must be removed at the cost of the applicant when the telecommunication facility is no longer in use by any telecommunication carrier.

This is a condition of approval that is accepted by the applicant.

S-2515
Areal Zoning Map



S-2515 Location Map



510,000 FT 232 NW

Joins Map 8 231 NW

230 NW

39°12'30"

229 NW
MD GRID 500,000 FT

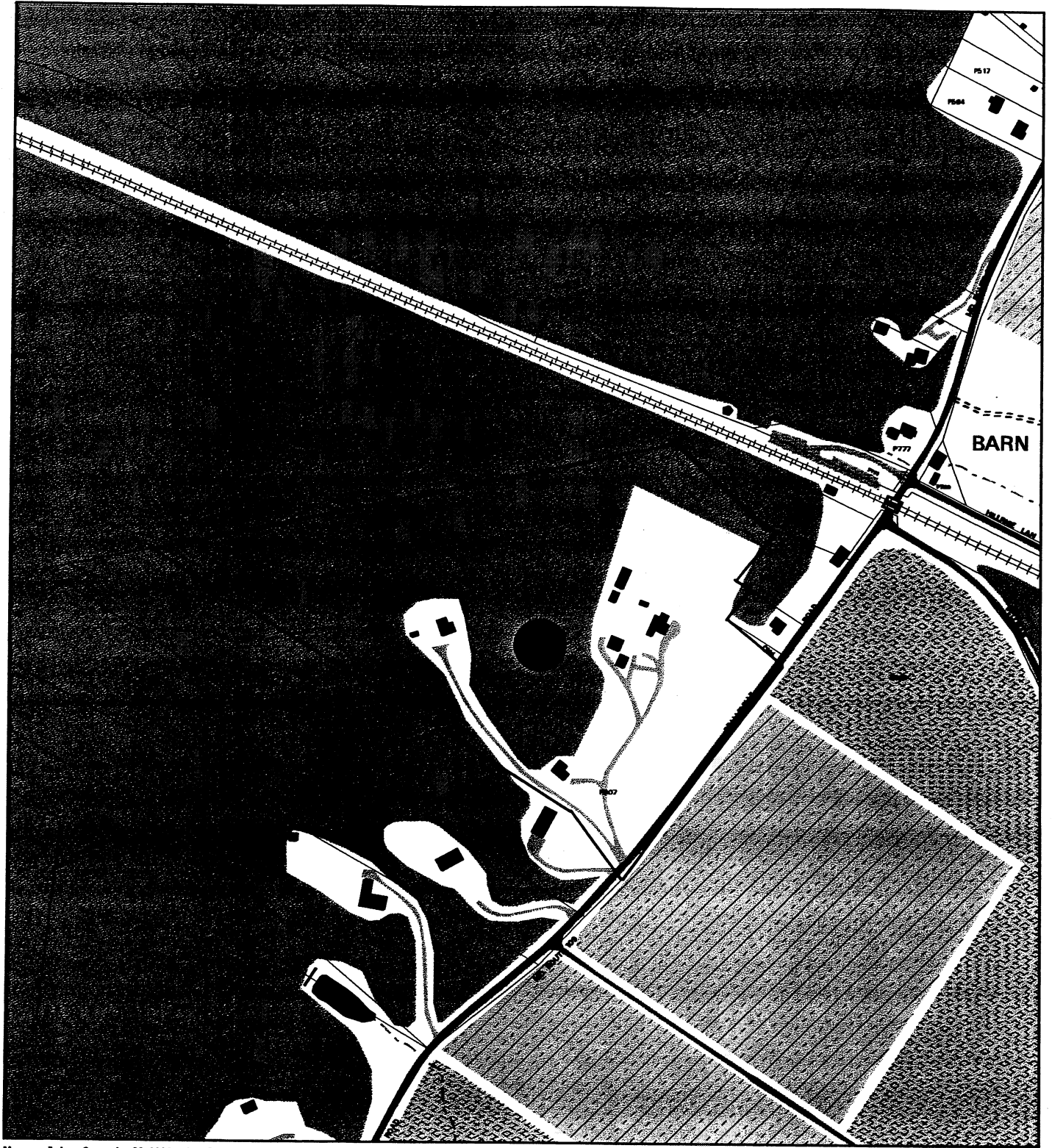
228 NW

0-20100

K 17 NW

© ALEXANDRIA DRAFTING CO.

VICINITY MAP FOR
S-2515 PROPOSED CELL TOWER



Map compiled on September 03, 2002 at 2:04 PM | Site located on base sheet no - 228NW18

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 1:14400 scale aerial photography using stereo photogrammetric methods.

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Key Map



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Research & Technology Center

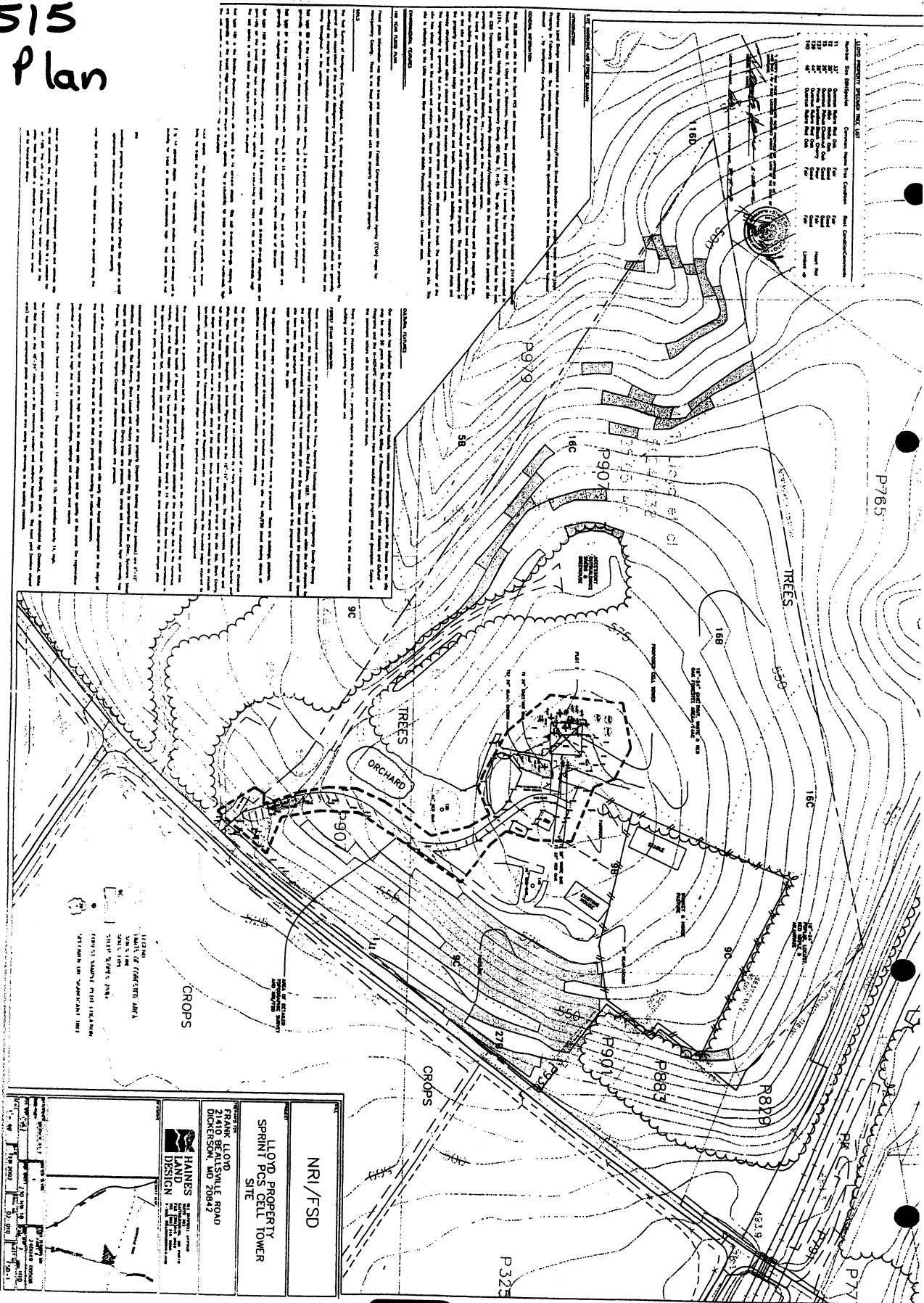


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MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING
 THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

8787 Georgia Avenue - Silver Spring, Maryland 20910-3760

U-2515 Site Plan

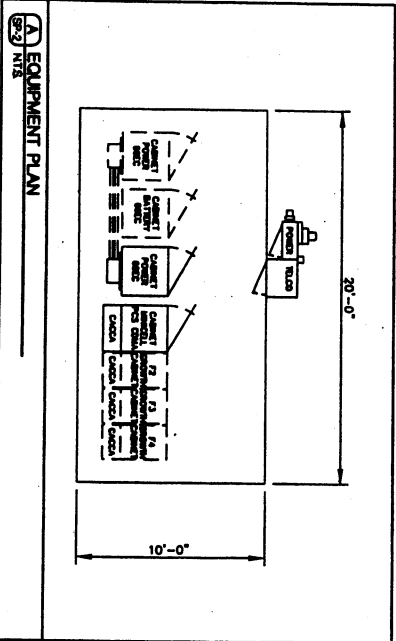
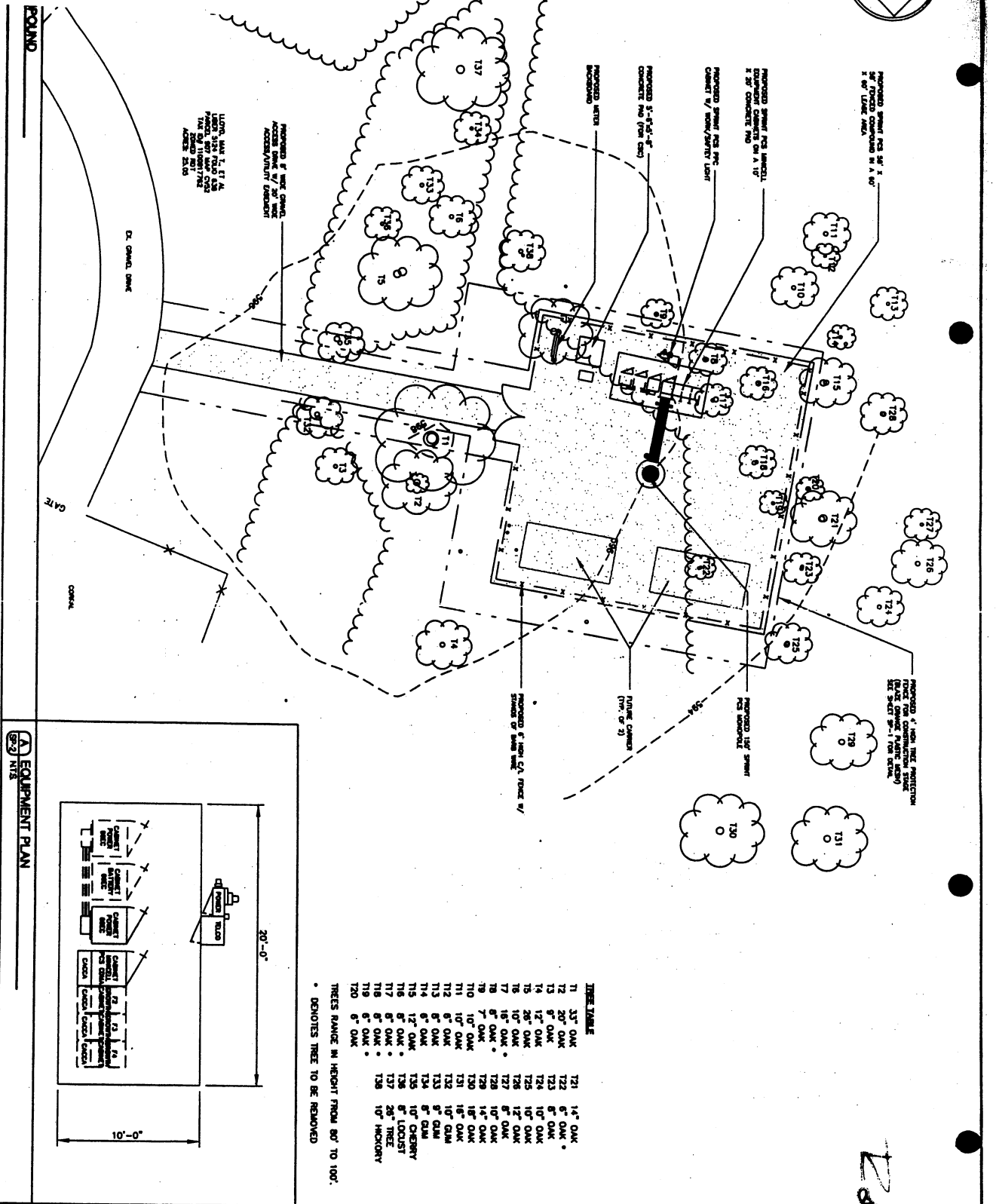


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EXHIBIT

F

S-2515 Site Plan



TREE TABLE

11	33" OAK	121	14" OAK
12	20" OAK	122	6" OAK
13	6" OAK	123	6" OAK
14	12" OAK	124	10" OAK
15	25" OAK	125	10" OAK
16	10" OAK	126	12" OAK
17	16" OAK	127	6" OAK
18	6" OAK	128	10" OAK
19	7" OAK	129	15" OAK
20	10" OAK	130	18" OAK
21	10" OAK	131	6" OAK
22	6" OAK	132	6" OAK
23	6" OAK	133	10" OAK
24	6" OAK	134	6" OAK
25	17" OAK	135	10" CHERRY
26	6" OAK	136	6" LOCUST
27	6" OAK	137	28" TREE
28	6" OAK	138	10" HICKORY
29	6" OAK		
30	6" OAK		

TREES RANGE IN HEIGHT FROM 60" TO 100".
* DENOTES TREE TO BE REMOVED

SP-2

EXHIBIT

D

LLOYD PROPERTY
WAS54XC683-C

7400 BEAULVALE ROAD
DICKERSON, MD 20842

AWC REALTY CO. LLC
20000 WOODBURN ROAD
FARMERS BRANCH, MD 21051
TEL: (301) 981-4000

WOODS REALTY INC.
10000 WOODBURN ROAD
FARMERS BRANCH, MD 21051
TEL: (301) 981-4000

BOYD & ASSOCIATES, P.C.
10000 WOODBURN ROAD
FARMERS BRANCH, MD 21051
TEL: (301) 981-4000

S-2515 Tower Rendering

Rd

NO.	DATE	REVISIONS FOR DRAWING
1	04-24-02	ISSUED FOR PERMITS
2	04-24-02	ISSUED FOR PERMITS
3		
4		
5		
6		
7		
8		
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10		

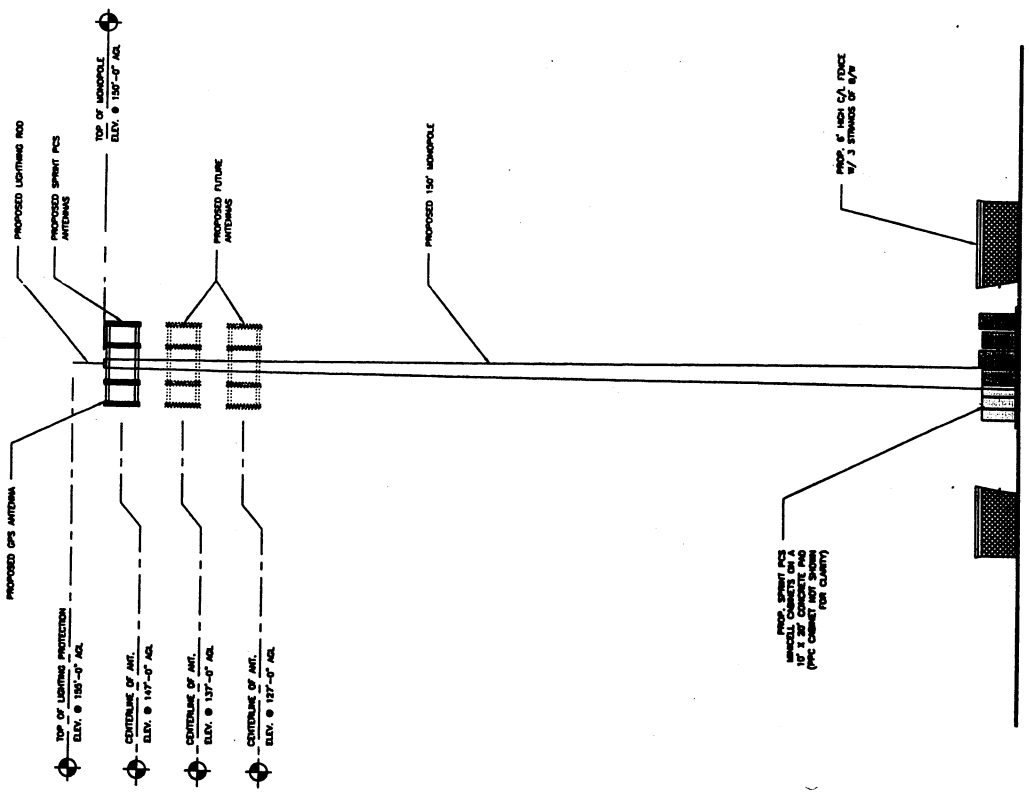
EXHIBIT
F

PROJECT NO. _____
DATE _____
PROJECT _____

LLOYD PROPERTY
WA54XC683-C
2110 BEALLSVILLE ROAD
DICKERSON, MD 20842

SHEET TITLE
SITE ELEVATION

SHEET NUMBER
SP-3





MONTGOMERY COUNTY, MARYLAND
TELECOMMUNICATIONS TRANSMISSION
FACILITY COORDINATING GROUP
RECORD OF ACTION

APPLICATION NUMBER: 200205-02

DATE: 3 July 2002

Application Review:	
Applicant:	Sprint PCS
Description:	Construct a new 150' monopole.
Site Location:	Lloyd Property 21410 Beallsville Road, Dickerson
Property Owner:	Terry, Nerissa, Frank & Eric Lloyd
Tower Coordinator Recommendation:	Recommended: <input checked="" type="checkbox"/> Not recommended: <input type="checkbox"/>
Land-owning Agency input:	Attached: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Group Comments: In its review of this application, the TIFCG noted several specific aspects of its review that they believed important and which they wanted to be clearly reflected in the record.</p> <p>First, they noted that the Tower Coordinator compared the RF contour maps with the confidential database that lists all sites from the annual plan information provided by all the carriers. That information, coupled with the site visit, revealed several possibilities that were presented to the carrier as potential alternatives for attachment on existing structures. The carrier was asked to provide additional RF contours to document why those sites were ruled out as locations where their antennas could be attached.</p> <p>The alternatives included: 1) replacing an existing County antenna pole to the east of the site, with a stronger structure which could accommodate the Sprint antennas; and 2) the use of existing PEPCO transmission line towers to the west of the proposed site.</p> <p>The Tower Coordinator reviewed the RF contours for those locations and agreed that coverage from either of those locations would leave some areas without reliable signals at -85dB, the signal level desired by the carrier. These areas, although they appeared small, would likely require additional antenna locations to provide more complete coverage, and since there are no other existing structures in the area, that could perhaps require additional new towers.</p> <p>The group also discussed the possibility of using a shorter structure at the proposed site to minimize the visual impact of the monopole. To further minimize the visual impact, the group discussed whether the site could be designed as a stealth facility like a "treepole" or a "flagpole" design. In its final analysis, the group was in agreement that the proposed height of 150' appeared to be necessary to ensure the desired coverage. They agreed that a stealth design may be a possibility for this site if a shorter pole was used. They also agreed that the limitations on the number of antennas used in a "flagpole" design would adversely impact coverage and consequently, perhaps diminish the potential interest of other carriers to use the site given the limitations imposed by the stealth "flagpole" design. The group also commented that a stealth "flagpole" design for a monopole of this height would appear unreasonably out</p>	

of place for this rural setting.

The group was notably disappointed at the lack of community outreach the carrier had conducted to notify the surrounding residents of this proposed siting. They strongly urged the carrier to contact the town of Barnesville to solicit any input that community may have with regard to the impact of this facility on the surrounding area.

The group asked if the annual plans of other carriers targeted this area as one in need of coverage. The Tower Coordinator replied that although no other plans included sitings at this particular location, undoubtedly it could be an attractive site for collocation as others expand their networks into this area.

Since the proposed site was next to a historical building (the commuter railroad station) and the Sugarloaf Historic District, the TIFCG was interested to know the status of the Maryland Historical Trust's review of this site. The carrier representative assured the group that the Trust has already signed off on the site, though the Trust's approval notation on an attachment to the application was illegible. Sprint agreed to provide a legible copy of the approval. The group also noted that the site is in an agricultural preservation area in which a monopoly is not necessarily compatible.

The recommendation is conditioned upon the approval of the Special Exception and the approval of the Maryland Historical Trust.

Vote on recommendation of approval: For: 4 Against: 1 Abstain: 0

Results: Recommended Not recommended

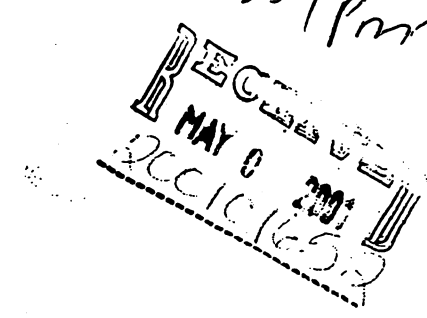
[Handwritten Signature]
Chairman Signature Date 8/5/02

[Handwritten Signature]
Tower Coordinator Signature Date 8-20-02



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FCC

6:55 / pm 3



April 28, 2001

Ms. Anne Bruder
State Historic Preservation Officer
Maryland Historic Trust
100 Community Place
Crownsville, MD 21032

RE: NEPA Screening
Sprint PCS
Lloyd Property Proposed Wireless Facility
21410 Beallsville Road
Dickerson, Montgomery County, MD 20842
MM&A Project No. E66674
Sprint SAR #: WA54XC683

Dear Ms. Bruder,

As the authorized representative of Sprint PCS and pursuant to 36 C.F.R. § 800 et seq., Marshall Miller & Associates, Inc. (MM&A) hereby requests a review of impacts to cultural resources that may result from the installation of the above referenced wireless telecommunications facility.

asmille
eh-neba
(14)
5-15-01

The planned wireless facility will be located on a 50' x 50' area of land. The proposed structure is a monopole of approximately 190-feet. The site is located in area that consists of undeveloped woodland at an elevation of approximately 590-feet above mean sea level in a rural area of Dickerson, Maryland. The general topography of the area consists of rolling hills.

trud
BG/8/01
pmB

An Area of Potential Effect (APE) was established based on the topography of the area, the height of existing treelines, and the height of existing buildings. For this site, an APE of one mile in all directions of the site was established.

A search of the National Register of Historic Places found no National Register sites within the APE. A search of the historical architectural inventories at the Maryland Historical Trust found numerous sites within the APE, Sugarloaf Mountain Historic District (M12-44), William T. Poole Farm (M12-15), Moses Tibbs Family House (M12-42-35), Mt. Zion M.E. Church and Cemetery (M12-42-04), Robert Vinton Hutchinson House (M12-42-14), Louisa Hutchinson Family House (M12-42-13), Awkard Family Cemetery (M12-42-01), Spencer Family Cemetery (M12-42-34), Mt. Zion Sellman School (M12-17), and Mary Smith Log House (M12-42-33). (Please refer to attached photographic record.) Based on the topography of the area consisting of rolling hills and the areas of dense foliage surrounding the site, MM&A believes that the monopole facility should not be visible from the historic properties identified.

3913 Hartzdale Drive, Suite 1306 / Camp Hill, PA 17011 / Tel 717.730.7810 / Fax 717.730.7812

Web Site — <http://www.mma1.com> • E-mail — pennsylvania@mma1.com

With Other Offices in Bluefield, VA / Richmond, VA / Bristol, VA / Charleston, WV / Lexington, KY / Raleigh, NC

Based on field observations and a review of the above-mentioned inventories, MM&A concludes the 190-foot facility should not be visible from the cultural resources identified by the Maryland Historic Trust. Therefore, we do not anticipate the proposed monopole to have an adverse effect on the cultural resources listed within the APE, and requests concurrence with this opinion.

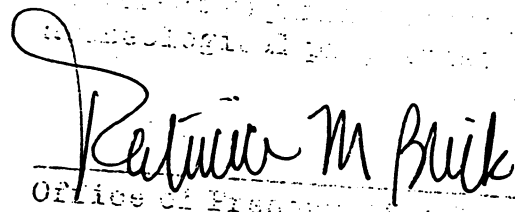
Attached are copies of relevant photographs and the APE map. Feel free to contact us at (717) 730-7810 if you have any questions.

Respectfully submitted,



Melissa M. Luke
Environmental Technician

A review of the APE for the proposed monopole
indicates that the proposed monopole
will not be visible from the cultural resources
within the APE.

 6/8/01

Office of Professional Services
Maryland Historical Trust

Date

