



November 17, 2023  
Job Number 2017748.70

**Brenda Delbert**  
**Director of Building and Planning**  
**City of Wheeling**  
**1500 Chapline Street**  
**Wheeling, WV 26003**

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**RE: AT&T Mobility – W047 Wheeling College**  
**908 National Road**  
**Wheeling, WV 26003**

Dear Ms. Delbert,

GPD Group is in receipt of the review letter from Center for Municipal Solutions dated August 17, 2023. Below are our responses to that letter addressing the concerns therein:

1. Per §1363.08.g The Applicant must provide documentation to verify it has the right to proceed as proposed on the Site. This would require an executed copy of the lease with the landowner or landlord or a signed letter acknowledging authorization. If the applicant owns the site, a copy of the ownership record is required.

**Response:** Please see the included memorandum of lease demonstrating AT&T's right to proceed on the Site.

2. Per §1363.08.j.2 Documentation that demonstrates and proves the need for the Wireless Telecommunications Facility to provide service primarily and essentially within the City. Such documentation shall include propagation studies of the proposed site and all adjoining planned, proposed, in-service or existing sites that demonstrate a significant gap in coverage and/or if a capacity need, including an analysis of current and projected usage.

Your letter states in the second paragraph, "AT&T Mobility is proposing to install a new wireless telecommunications facility to increase capacity/coverage in the area." The narrative further states, "The site is intended to increase capacity around Wheeling College and provide additional coverage in the neighborhoods of Edgewood and Woodsdale. Coverage would be enhanced along WV88 and US40."

In that this is a new facility, requirements for this section are listed in detail in attached exhibits 1-3.

**Response:** Please see the included propagation maps demonstrating the need for additional coverage at the proposed site. The first two maps show the existing and proposed coverage in the area, and it can be seen comparing the maps that a large area of marginal and unreliable coverage is improved to reliable coverage, essentially improving everything up to the surrounding hills. Exhibit 2 is also included with this response showing the propagation data used for creating the propagation maps. Regarding the need for capacity relief of surrounding sites, W008 Sector B is the sector that is at the highest percent of its utilization, and the proposed W047 will be providing relief for that site/sector. A chart has been included showing the utilization of W008 Sector B. The utilization percent is determined on a monthly basis and is based on an average of the top ten busy hours for a given month. The chart shows actual

historical utilization figures for the past three months as well as projections for the future. In most cases, AT&T plans to provide capacity relief for a given site/sector when utilization based on the busy hour criteria defined above reaches 60 percent. As shown in the provided chart, the historical utilization for W008 Sector B is nearly 100 percent and is projected to exceed the capacity of the sector by the end of the year. As can be seen in the third included propagation map, W008 Sector B (pointing east) provides the best service to a large portion of Wheeling College and the areas to the north and east of the proposed site, and the fourth propagation map shows that the proposed site will be the best service for the majority of the area to the north and east that was previously covered by W008 Sector B in addition to providing the best service to portions of Wheeling College.

3. Per §1363.08.j.16 The actual intended transmission power stated as the maximum effective radiated (ERP) in watts is required. Please see Exhibit 2.

**Response:** The transmission power stated as ERP is included in the attached Exhibit 2.

4. Per §1363.08.j.17 Signed documentation such as the "Checklist to Determine Whether a Facility is Categorically Excluded," to verify the proposed Wireless Telecommunications Facility will be in full compliance with the current FCC RF Emissions guidelines (NIER) is required. If the site is not categorically excluded, a full RF Emissions study is required. The letter dated 3/25/21 from Joseph Spiecha, RF Engineer for AT&T, describes the RF Emissions policies of AT&T and not an RF Emissions compliance study.

**Response:** Please see the included checklist demonstrating that the proposed facility is categorically excluded.

5. Per §1363.08.j.20 A copy of the geotechnical sub-surface soils investigation, evaluation report foundation for the proposed Tower site. No geotechnical information for the proposed site has been submitted.

**Response:** We would like to request temporary relief from this requirement to defer the cost associated with performing a geotechnical investigation until after we have an approval contingent on providing the items for which temporary relief is granted.

6. Per §1363.08.k The applicant will provide a written copy of an analysis, completed by a qualified individual or organization, to determine if the proposed new Tower or existing structure intended to support wireless facilities is in compliance with Federal Aviation Administration Regulation Part 77 and if it requires lighting. This requirement shall also be for any existing structure or building where the application increases the height of the structure or building. If this analysis determines that an FAA determination is required, then all filings with the FAA, all responses from the FAA and any related correspondence shall be provided with the application. The statement in the zoning narrative will not satisfy this requirement.

**Response:** Please see the included analysis demonstrating compliance with FAA Part 77 and demonstrating that lighting is not required.

7. Per §1363.08.l.1 In the case of a new Tower, the Applicant shall be required to submit a written report demonstrating its meaningful efforts to secure shared use of existing Tower(s) or the use of alternative buildings or other structures within the City by including:

- A. The names, addresses, and telephone numbers of all owners of other towers or usable antenna support structures within a one-half mile radius of the proposed new tower site, including City-owned property. The applicant must notify such property owners in

writing and supply the city with copies of such notices.

- B. An affidavit attesting to the fact that the applicant made diligent, but unsuccessful, efforts to obtain permission to install or collocate the applicant's telecommunication facilities on another usable antenna support structures located within a one-half mile radius of the proposed tower site.
- C. An affidavit attesting to the fact that the applicant made diligent, but unsuccessful, efforts to install or co-locate the applicant's telecommunications facilities on towers or usable antenna support structure owned by other persons located within a one-half mile radius of the proposed tower site.
- D. Written technical evidence from an engineer that the proposed tower or telecommunications facilities cannot be installed or collocated on another person's tower or usable antenna support structures owned by other persons located within one-half mile radius of the proposed tower site.

Copies of written requests and responses for shared use shall be provided to the City in the Application, along with any letters of rejection stating the reason for rejection.

The letter from Springhill Suites declining the roof top application was reviewed and is acceptable. No other information on possible collocation, has been provided.

**Response:** Please see the included report demonstrating efforts to use existing infrastructure.

- 8. Per §1363.08.l.3 Documentation regarding the feasibility of designing the proposed Tower to accommodate future demand for at least three (3) additional commercial applications using the criteria described in this section is required.

**Response:** We would like to request temporary relief from this requirement to defer the cost associated with performing a structural analysis until after we have an approval contingent on providing the items for which temporary relief is granted.

- 9. Per §1363.08.l.4 A statement of compliance affirming that the proposed new wireless tower, if constructed, shall be inspected within the criteria stated in this section, prior to the issuance of Certificate of Compliance is required.

**Response:** AT&T will comply with the inspection requirements and acknowledges that the inspection report must be provided prior to the issuance of the Certificate of Compliance.

- 10. Per §1363.08.m The Applicant shall provide certification with documentation (structural analysis) including calculations that the Telecommunication Facility Tower and foundation and attachments, and any other supporting structure as proposed to be utilized are designed and will be constructed to meet all local, City, State and Federal structural requirements for loads, including wind and ice loads. All new or modified towers or other vertical support structures containing wireless antennas shall be designed to an EIA-TIA-222-G Structure Class III standard.

**Response:** We would like to request temporary relief from this requirement to defer the cost associated with performing a structural analysis until after we have an approval contingent on providing the items for which temporary relief is granted.

11. Per §1363.08.q A demonstration in writing/or by drawing how the proposed Wireless Telecommunication Facility, the base and all related equipment and structures will be effectively screened is required. There was no illustration of screening included in the submitted materials.

**Response:** The base of the tower and the equipment within the fence will be screened by the chain link fence which will have green-colored privacy slats inserted into the fabric around the entire compound. The fence will be 8' tall with 1' of barbed wire, which is standard across the industry. The green-colored slats are called out in the drawings on sheets C-1, C-2, C-11, and T-1. Aside from the tower itself, which is the largest visual component of this proposal, the only equipment potentially visible above the fence will be the equipment cabinet and the ice bridge. The equipment cabinet and ice bridge are screened from view to the west, south, and east by the existing tree cover. With the exception of the few businesses on Anthoni Road, the only area with visibility to the base equipment will be the general public to the north. Given the large difference in elevation between the proposed site and the area to the north, approximately 90 feet, the vast majority of the base equipment will be effectively screened by the fence due to the viewing angle.

12. Per §1363.09 The location of the proposed Wireless Telecommunications Facility shall be sited and erected in accordance with the priorities 1-8 set forth in this section. If the proposed Wireless Telecommunication facility is not proposed the highest priority, then a detailed explanation must be provided as to why a site of a higher priority was not selected. All portions of this section need to be complied with.

**Response:** Please see the attached report explaining why sites higher in priority than the chosen site were not selected.


13. Per §1363.11 Propagation maps for the lowest frequency band at maximum power (from Table 2. Propagation Study Sheet) to be used at this proposed site are required. Propagation studies must include all backup data used to perform the analysis at each height. Maps must be submitted in 10-foot increments below the proposed height of 85 feet (75 feet, 65 feet, etc.). At each level, a narrative must be submitted describing the area that is no longer covered that is primarily and essentially within the city. Continue to show 10-foot increments until there is a significant change in coverage.

**Response:** The propagation maps were provided as part of the response for comment #2. The fifth and sixth propagation maps show the difference in coverage for the 700 MHz band at the 80' and 70' elevations. A significant loss in coverage can be seen to the southeast of the proposed site (W047). There is also loss in coverage to the southwest of the proposed site. Propagation maps have also been provided showing the existing coverage around the proposed site and the proposed coverage provided by the site. The last map provided indicates which sector provides the best service for any given location. Existing and proposed maps are provided to demonstrate that the new site will provide the best service for a large region around the proposed location.

14. Per §1363.15 A survey was submitted without measurements to verify the proposed tower has complied with the setback requirement of this section. A survey or lot plan with actual measurements verifying the proposed tower meets the set back requirements of this section is required.

**Response:** Please see the attached Rev 1 construction drawings with the setbacks provided on sheet C-1.

15. Per §1363.21 The Applicant and the owner of record of any proposed Wireless Telecommunications Facilities property site shall, at its cost and expense, be jointly required to execute and file with the City a bond, or other form of security acceptable to the City as to type



of security and the form and manner of execution, in an amount of at least \$75,000.00 for a Tower facility with such sureties as are deemed sufficient by the City to assure the faithful performance of the terms and conditions of this Ordinance and conditions of any Special Use Permit issued pursuant to this Ordinance. The full amount of the bond or security shall remain in full force and effect throughout the term of the Special Use Permit and/or until any necessary site restoration is completed to restore the site to a condition comparable to that, which existed prior to the issuance of the original Special Use Permit.

**Response:** We would like to request temporary relief from this requirement to defer the cost associated with securing a surety bond until after we have an approval contingent on providing the items for which temporary relief is granted.

16. Per §1363.23 A holder of a Special Use Permit for Wireless Telecommunications Facilities shall secure and at all times maintain public liability insurance for personal injuries, death and property damage, and umbrella insurance coverage, for the duration of the Special Use Permit in amounts as set forth in this section. Proof of insurance must be submitted.

**Response:** We would like to request temporary relief from this requirement to defer the cost associated with securing liability insurance until after we have an approval contingent on providing the items for which temporary relief is granted.

In conclusion, we believe that all of the comments from the review letter have been addressed by this response letter and the associated documentation provided. Please let us know if further information or clarification is required.

Sincerely,

GPD Group

Michael Beddow, PE  
Associate Project Manager