



July 14, 2023
Job #2017748.70

Ms. Brenda Delbert
Director of Building and Planning
City of Wheeling
1500 Chapline Street, Suite 305
Wheeling, WV 26003

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

Dear Ms. Delbert,

GPD Group is submitting this narrative letter, Application for Special Use, and all associated documentation on behalf of AT&T Mobility in order to obtain a Special Use Permit for a proposed Wireless Telecommunications Facility in the City of Wheeling near National Road and Bethany Pike. The owner of the property is Bedway Land and Minerals Co. located at 67877 Pancoast Road North, Belmont, OH 43718 and can be reached by telephone at (740) 782-0044. The tower will be owned by AT&T Mobility with offices located at 635 Grant Street, Pittsburgh, PA 15219.

AT&T Mobility is proposing to install a new wireless telecommunications facility to increase capacity/coverage in the area. The proposed wireless telecommunications facility comprises a monopole tower, walk-in equipment cabinet, backup generator, and overhead utilities. The site would be secured by use of a chain link fence and alarms on the generator and equipment cabinet. 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. The height of the tower is the minimum required to provide the additional coverage/capacity needed.

The proposed tower is to be located in a commercial area with trees to the west, south, and east to limit the visual impact of the tower to nearby residences. The proposed new tower will be in compliance with FAA Regulation Part 77 and will not require lighting or marking/painting. Instead, the tower will have a galvanized finish to further minimize its visual impact and harmonize with the surroundings. Due to the tower's location amongst other businesses, combined with the relatively low height of the tower and large number of trees shielding the commercial area from view of the nearby neighborhoods, very few residences will be subject to the visual impact of the proposed tower. The nearest residential structure is approximately 400 feet to the southeast of the proposed tower, but a stand of trees shields the tower from view. The tower will be able to be seen from nearby businesses and adjacent streets, but the commercial nature of the surrounding area serves to minimize the visual impact of the tower.

In accordance with the City's Code of Ordinances, AT&T Mobility declares that its proposed wireless telecommunications facility will be maintained in a safe manner, and in compliance with all conditions of the Special Use Permit, without exception, unless specifically granted relief by the City in writing, as well as all applicable and permissible local codes, ordinances, and regulations, including any and all applicable City, State, and Federal law, rules and regulations. In

addition, the construction of the wireless telecommunications facility is legally permissible, including, but not limited to the fact that AT&T Mobility is authorized to do business in the State.

Only one sufficiently tall structure exists in the area, the nearby SpringHill Suites. The owners were contacted regarding a possible rooftop site, but they were not interested. Based on our experience, it is likely that the rooftop of the hotel would have been structurally insufficient to support the loads of the proposed equipment anyway. There are no other towers within ½ mile of the proposed site. More preferable zoning districts were not considered due to the lack of such zoning districts within the area of capacity/coverage need.

The modulation being used will be QPSK, 16 QAM, 64 QAM, or 256 QAM and is determined by several factors including signal strength, signal quality, and number of users. Please see below for the frequency table for the proposed facility:

Band	Maximum ERP (W)
700	1100
700 First Net	2320
850	1220
1900 (PCS)	3980
2100 (AWS)	4680
C Band	22380
5G DoD	22380

We would like to request temporary relief from several sections of the zoning ordinance. Those sections would be §§1363.08(g), 1363.08 (j)(7), 1363.08 (j)(13), 1363.08 (j)(20), 1363.08 (k), 1363.08 (m), and 1363.21. Each of these sections represents a cost to AT&T Mobility which, for a site that is not yet approved by zoning, creates risks that are difficult to justify taking on. It would be the intent to provide the information requested in each of the sections further along in the process once a favorable response has been received in regard to the granting of the Special Use Permit.

We would also like to request relief in its entirety from the requirements of §1363.08(l)(2)(A) regarding holding a balloon test. The purpose of a balloon test is to demonstrate the approximate final height of the tower to those received notice of the public hearing. With this particular site, a balloon test seems unnecessary as the existing nearby trees provide a good reference point with regard to the height of the tower, with the tower height only barely exceeding the height of the existing trees. Balloon tests also have traditionally been difficult to hold due to the uncertainty that the weather poses.

I hereby attest that the information provided herein is the truth and complete to the best of my knowledge.

Sincerely,

GPD Group



Mike Beddow, PE
Associate Project Manager