

E&R-2011-08

RESOLUTION on Criteria for Locating Telecommunications Facilities in Parkland

- 1) WHEREAS residents and businesses are requesting improved telecommunications coverage, the need for wireless capacity and coverage is growing, and telecommunication carriers are applying to place facilities in residential neighborhoods and nearby parks;
- 2) WHEREAS the Fairfax County Board of Supervisors and Planning Commission have established policy giving priority to locating telecommunications facilities on public lands and for collocating antennas on existing telecommunications facilities;
- 3) WHEREAS residents object to towers in or near their neighborhoods because of real or perceived negative impacts on property values, community aesthetics, quality of life, and health;
- 4) WHEREAS parks have been established for recreation and to protect and preserve natural habitats and environmentally sensitive areas and historic and cultural resources, and the Fairfax County Park Authority has a responsibility to manage parks as a public trust;
- 5) WHEREAS communications facilities can impact the recreational uses of parks and can have environmental impacts, including bird collisions with towers, increasing impervious surfaces, and the disturbance and destruction of natural habitat;
- 6) WHEREAS Fairfax County Park Policy 303 allows Park Authority property to be considered for placement of a telecommunication facility if "a determination has been made that there is no feasible and prudent alternative to the use of parkland and that all possible planning to minimize harm is included in the proposed project," but criteria for such a determination are unclear;

BE IT THEREFORE RESOLVED THAT the Mount Vernon Council of Citizens' Associations requests that the Fairfax County Park Authority (FCPA) change its Policy 303 to develop precise and concrete criteria for determining whether and where telecommunications facilities should be allowed in parks, and these criteria should ensure that natural resources and park activities are not significantly impacted;

BE IT FURTHER RESOLVED THAT the public should be provided the opportunity to comment on the criteria;

BE IT FURTHER RESOLVED THAT the criteria should prohibit telecommunications facilities in environmentally sensitive areas (refuges, nature preserves, Resource Protection Areas, etc.), in areas with rare or state- and/or federally-listed endangered and threatened species, or in areas where FCPA determines that other natural or historical or cultural resources or recreational features should be protected;

BE IT FURTHER RESOLVED THAT the criteria should take into account potential impacts on natural resources (including water quality, habitat fragmentation, and wildlife), viewshed, and recreational value of the parkland of road construction, installation of power lines, damage and removal of vegetation, size and location of footprint, lighting, pole height, guy wires, etc. (see the attached list of what the criteria might include);

BE IT FURTHER RESOLVED THAT the amended policy 303 should ensure that when telecommunications facilities are determined to be suitable on parkland, best practices are

incorporated into their design, and that telecommunications companies mitigate impacts to the recreational uses of the park and to natural resources, by, for example, planting trees to replace those destroyed.

**Attachment: Examples of Criteria for Siting of Communication Facilities in
Fairfax County Parks**

(Drawn from existing U. S. Fish and Wildlife Service Guidelines)

1. Any applicant proposing to construct a new communications facility should be strongly encouraged to collocate the communications equipment on an existing communications or transmission facility.
2. If collocation is not feasible and a new facility is to be constructed, communications service providers should be strongly encouraged to construct a facility of no more than 125 feet above ground level (AGL), using construction techniques which do not require guy wires (e.g., use a lattice structure, monopole, etc.). Such facilities should be unlighted if Federal Aviation Administration regulations permit.
3. Communications facilities should not be sited in or near wetlands, other known bird concentration areas (e.g., state or Federal refuges, staging areas, rookeries), in known migratory or daily movement flyways, or in habitat of threatened or endangered species. If significant numbers of breeding, feeding, or roosting birds are known to habitually use the proposed construction area, relocation to an alternate site should be recommended.
4. Seasonal restrictions on construction may be required in order to avoid disturbance during periods of high bird and wildlife activity.
5. Towers and related facilities should be sited, designed and constructed to avoid or minimize habitat loss in and near the facility's "footprint." Road access and fencing should be minimized to reduce or prevent habitat fragmentation and disturbance, and to reduce above ground obstacles to birds in flight.
6. In order to reduce the number of facilities needed in the future, providers should be encouraged to design new facilities structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for at least two additional users (minimum of three users for each structure), unless this design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower.