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August 11, 2015

Tom Brechko and Commissioners
Knoxville-Knox County Metropolitan Planning Commission
400 Main Street, Suite 403
Knoxville, TN 37902

RE: Branch Towers LLC's Application For Use On Review Approval of Cell Tower
Placement at 2119 Ridgecrest Drive (5-B-15-UR)

Dear Mr. Brechko and Commissioners:

In reviewing the materials supplied with the agenda matters for the Metropolitan Planning Commission Meeting scheduled for August 13, 2015, there was an Executive Summary submitted by some residents in opposition to the above-referenced application. We have tried to address all of the issues which the opposition has raised in regards to the site as we have looked at numerous alternative sites and met with the neighbors twice. We would like to address two issues raised in their executive summary: (a) Whether there is more than one tower proposed for the site and (b) Whether the proposed tower fulfills the principles of wireless communication facilities plan?

(a) Is Branch Towers requesting approval of more than one (1) tower?

No. Branch Towers is only requesting approval of one tower. The drawing/site plan shown in the residents' executive summary states that it shows "the projection of future lease sites for 3 additional towers." This is not correct. Those future lease areas shown on the drawing are spaces reserved for cabinets or shelters for future carriers to be located on this proposed tower as noted on C4 of the submitted plans.

(b) Does The Proposed Site Meet the Criteria Laid Out In The Wireless Communication Facilities Plan?

The siting of the tower and the screening provided by large trees on the site make this site comply with the principles of the Wireless Communications Facilities Plan. The Wireless Communication Facilities Plan is a set of guidelines which was passed in 2002. The Plan specifically states that they are advisory and are not a legal requirement. The residents say that the proposed site does not fulfill the criteria outlined for towers in regards to View Protection, Land Use Compatibility and Design Compatibility. They argue that because the proposed site is in a sensitive area and an avoidance area under the Land/Use Wireless Facilities Matrix, the application should be denied.

The analysis under the Facilities Plan does not end with the Matrix. It starts there. The facilities plan provides that “...*there will be instances where new towers will be acceptable in a sensitive or avoidance area with proper siting, appropriate design or effective screening.*” The matrix does not address screening. So even though, the matrix may show a discouraged site, a site can still meet the principles of the Facilities Plan by having a site that has good screening. The Facilities Plan provides:

- The following siting alternatives are encouraged.
 1. On sites where existing topography, vegetation, buildings, or other structures, screen facilities to the extent that the visibility from other properties is minimal.
 2. Sites where “Stealth” or alternative tower structures, which have the appearance of structures that are customarily part of the landscape, can be located.
- “One of the most effective screening techniques involves locating towers among stands of mature trees so that the base and a large part of the tower will be hidden from view.”
- Siting on a Ridge may be addressed by the siting and buffering for the tower.
 - The plan provides that the applicant for a tower may “use a backdrop to reduce visibility.”
 - The applicant may “locate towers below the ridgeline, not exceeding 30 feet above the ridge top tree line. Ridge top tree line is defined as the height of the tallest tree within 100 feet either side of the place where the tower exceeds the height of the ridgeline.”

Ridgeline

The tower is located below the ridgeline and is a low tower. There are approximately 400 towers in Knox County. Less than 50 of those towers are 150 feet or lower. The proposed tower at this site is 150 feet. Its elevation will be even lower because the site will be graded down by 15 feet.

The proposed tower does not exceed thirty (30) feet above the ridge top tree line. The site is located at an elevation of 1207 feet. The site will be graded down by 15 feet to 1192 feet. The top of the ridge has an elevation of 1320 feet. $1320 - 1192 = 128$. The difference in elevation without adding any elevation for trees is 22 feet, thus, meeting the criteria laid out in the Plan to protect the ridge in regards to view protection (30 feet above the tree line on the top of the ridge). To further illustrate the impact of the site on the ridge, we have included the picture of the balloon test as viewed from I-640 and Broadway. It shows that the tower will not be 30 feet higher than the tree line.

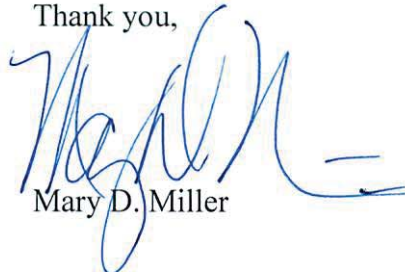
Screening:

The screening provided by the old growth trees on this site causes the site to meet the principles of the Wireless Communication Facilities Plan. The proposed site is heavily wooded with old growth trees on the perimeter of the site which range between 70 and 100 feet. This is an area where the terrain and ridges are sloping and curving. That along with the foliage and trees will help shield the tower from visibility. There are some places where the tower will be seen, but there are many places where the tower cannot be viewed because of the trees, foliage and topography.

This site does meet the principles of the wireless communication facilities plan. It has good siting on a large parcel of property; it has dense screening with old growth mature trees and the proposed tower does not protrude over the ridge. This is the kind of site which the Facilities Plan envisions and we believe that it complies with the Facilities Plan.

I hope that we have addressed all of your questions and concerns about the tower. If you have any other questions related to the application, please call me at 865-934-4000. We look forward to presenting our formal request at MPC's August 13 meeting, and would request that you approve the application.

Thank you,

A handwritten signature in blue ink, appearing to read 'Mary D. Miller', with a horizontal line extending to the right.

Mary D. Miller



MONOPOLE

Hwy 330 & 31



PHOTO SIMULATION NOT TO SCALE. ALL DIMENSIONS ARE APPROXIMATE, AND DEVELOPMENT PLANS ARE SUBJECT TO CHANGE.