



10200 Connecticut Avenue, Suite 308, Kensington, MD 20895

September 7, 2022

TO;

Gabriel Albornoz, President
Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

SUBJECT: ZTA-22-01 reference amendment on Commercial Use Zoning to address Antennas on Existing Structures, Use Standards.

Dear Council President Albornoz and members of the Montgomery County Council,

Through this letter, the Hispanic Chamber of Commerce of Montgomery County asks that you represent the interests of minority small business owners, facilitating on the road and on work site communications via cellular networks by approving the amendment proposed by Councilmember Reimer that would reduce the setback for 5G transmission boxes/ antennas on existing structures.

The Chamber strongly favors this amendment and we ask that you support this motion and approve the requested modification, as it would greatly help our workforce and members of the small business community.

The amendment provides a more reasonable approach that will ease the establishment of a good cellular communication network by allowing the setback minimum to be at 30 feet instead of 60 feet from a dwelling unit in a rural residential, residential or Planned Unit Development zone. This amendment impacts Chapter 59 of the Montgomery County Code 3.5.14.C – “Antenna on Existing Structure” under Division 3.5 “Commercial Uses”.

Many County small business owners and their staff depend on timely communication at sufficient speeds to conduct civil engineering and construction trade work, as well as in other areas of industry requiring substantial mobility and access to information. We ask that you expedite this amendment as it will facilitate placing 5G cellular tower nodes (antennas) in strategic locations to optimize cellular communications coverage at sufficient speeds for timely sharing of engineering designs and real time imaging. Thank you for your continued support and service.

Carmen Ortiz Larsen
President and Chair of the Board of Directors

A handwritten signature in black ink that reads 'Carmen Ortiz Larsen'.



Wireless
Infrastructure
Association

September 7, 2022

Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Re: Support - Zoning Text Amendment (ZTA) 22-01

Dear President and Members of the Council

The Wireless Infrastructure Association (WIA) writes in support of the proposed Zoning Text Amendment 22-01 (the "Amendment"). If adopted, this Amendment would pave the way to increased wireless connectivity in Montgomery county and continue to the deployment of 5G networks – the next generation of wireless services.

WIA works to support the responsible and sustainable deployment of wireless infrastructure to efficiently deliver wireless access to all communities. Our members include broadband infrastructure providers, wireless carriers, equipment manufacturers, and professional services firms that collectively own and operate wireless networks in Maryland and throughout the United States.

While in the past years Montgomery County has made steps to modernize county processes and rules to deploy wireless networks more efficiently, the existing zoning ordinances contain inconsistencies that are addressed by the Amendment. Specifically, if an applicant needs to install their equipment 30 feet from a building, they must install a new pole or a replacement pole because under current guidelines the use of existing poles 30 feet from a building is prohibited. The unintended consequence is that applicants are incentivized to apply for new poles or replacement poles even when there is an existing pole that is capable of hosting the wireless equipment at hand. This current policy fully contradicts how the wireless industry operates in the real world. Using collocation opportunities, the wireless industry first explores already-existing infrastructure that can host wireless equipment before digging the ground for additional vertical assets. The Amendment reconciles this current discrepancy between new, replacement and existing poles by allowing telecommunication facilities on existing poles that are at least 30 feet away from a building. The benefit of this change is the reduced proliferation of infrastructure in the right-of-way to the benefit of Montgomery County residents and communities.



Wireless
Infrastructure
Association

The demand for wireless services from our customers – your constituents – creates a shared responsibility of government and industry to ready the next-generation networks that will serve consumers today and into the future. The small cells that will be enabled by the Amendment will add much-needed capacity to provide the connectivity we all demand today and to prepare for the future. Strong wireless networks enable distance learning for students of all ages; telehealth for patients and health care providers; remote working opportunities; small businesses to thrive in the digital economy; older adults to stay in touch with family and combat social isolation; public safety personnel to utilize the best resources for our safety; and much more. As more Montgomery County residents rely on these wireless services, the Amendment would allow the wireless industry to explore additional opportunities to deploy wireless infrastructure, resulting in greater investment, increased capacity, and advanced wireless connectivity fueling the jobs of today and tomorrow.

We urge you passage of this important Amendment.

Thank you for your time and consideration. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arturo Chang", written over a horizontal line.

Arturo Chang
Director and Senior Counsel
State Government Affairs
703.535.7451
Arturo.Chang@WIA.org



September 13, 2022

The Honorable Gabe Albornoz
Council President
Montgomery County Council
100 Maryland Avenue
Rockville, Maryland 20850

Dear Council President Albornoz:

The Montgomery County Chamber of Commerce (MCCC) supports the ZTA 22-01, *Antenna on Existing Structure - Use Standards*. This proposed zoning text amendment would reduce the setback for antennas on existing structures from 60 feet to 30 feet.

ZTA 22-01 addresses inconsistencies in zoning ordinances related to small cell infrastructure. For example, if an applicant needs to install equipment 30 feet from a building, they must install a new pole or a replacement pole. The use of existing poles 30 feet from a building is prohibited. The unintended consequence is that applicants are incentivized to apply for new poles or replacement poles even when there is an existing pole that works just as well. ZTA 22-01 reconciles discrepancies between new, replacement and existing poles by allowing telecommunication facilities on existing poles that are at least 30 feet away from a building. The benefit of this change is the reduced proliferation of infrastructure in the right-of-way.

While ZTA 22-01 is technical in nature its passage will significantly advance the ability to implement 5G technologies in Montgomery County. The small cells that will be enabled because of ZTA 22-01 will add much-needed capacity, which is now a core economic necessity for any jurisdiction, and Montgomery County is no different. The County's economy heavily relies on innovation to create jobs and advance economic activity. The opportunities for innovation and advancement in health care, transportation, public safety, education, manufacturing, entertainment, and many other sectors cannot be understated.

Again, MCCC supports the passage of ZTA 22-01 and as always, we look forward to working with Montgomery County on this and other important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Godwin".

Georgette "Gigi" Godwin
President & CEO
Montgomery County Chamber of Commerce

cc: Members, Montgomery County Council



CLYDE E. BOATWRIGHT
STATE PRESIDENT

MARYLAND STATE LODGE FRATERNAL ORDER OF POLICE®

8302 COVE ROAD BALTIMORE, MD 21222



KENNETH SCHUBERT
SECRETARY
EARL KRATTSCH
TREASURER

September 01, 2022

**Honorable Gabe Albornoz, Council President,
Honorable Evan Glass, Vice President,
Honorable Andrew Friedson District 1,
Honorable Craig Rice, District 2,
Honorable Sidney Katz, District 3,
Honorable Nancy Navarro, District 4,
Honorable Tom Hucker, District 5
Honorable Will Jawando, At-Large,
Honorable Hans Riemer, At-Large
Montgomery County Government
100 Maryland Avenue, 6th Floor
Rockville, Md 20850**

Dear Honorable Council President and Councilmembers,

On behalf of the MD5G Partnership, we urge you to support Zoning Text Amendment (ZTA) 22-01 to reduce the setback for antennas on existing structures from 60-feet to 30-feet. MD5G Partnership represents more than 35 organizations statewide that have come together in support of building connected communities through enhanced wireless networks. We have seen firsthand the benefits of wireless connectivity across sectors including education, public safety, healthcare, transportation, and tech.

In 2018, ZTA 18-02 was passed by County Council allowing the deployment of small cells in commercial and mixed-use areas. Then in 2021, the council passed ZTA 19-07 to allow small cell antennas in residential zones. As the demand for mobile data continues to grow with more devices connecting to wireless networks than ever before, these were critical steps toward ensuring the county has the wireless networks it needs to keep residents and businesses connected and safe.

However, the existing zoning ordinances contain inconsistencies that are addressed by ZTA 22-01. If an applicant needs to install their equipment 30 feet from a building, they must install a new pole or a replacement pole. The use of existing poles 30 feet from a building is prohibited. The unintended consequence is that applicants are incentivized to apply for new poles or replacement poles even when there is an existing pole that works just as well. ZTA 22-01 reconciles discrepancies between new, replacement and existing poles by allowing telecommunication facilities on existing poles that

Representing the Professional Police Officers of the State of Maryland

are at least 30 feet away from a building. The benefit of this change is the reduced proliferation of infrastructure in the right-of-way.

The small cells that will be enabled as a result of ZTA 22-01 will add much-needed capacity to provide the connectivity we all demand today and to prepare for the future. Strong wireless networks enable distance learning for students of all ages; telehealth for patients and health care providers; employees working from home; small businesses to thrive in the digital economy; older adults to stay in touch with family and combat social isolation; public safety personnel to utilize the best resources for our safety; and so much more.

Robust wireless networks help keep us safe. Across the U.S., 80% of 911 calls are made from a mobile device. And communication infrastructure helps emergency personnel do their jobs safely and effectively by providing real-time access to the information they need.

We urge you to support Zoning Text Amendment (ZTA) 22-01 to enhance the wireless networks we depend on.

Respectfully Yours,

A handwritten signature in black ink, appearing to read 'Clyde Boatwright', with a stylized flourish at the end.

Clyde Boatwright
State President



GREATER WASHINGTON
Board of Trade

Statement of Daniel Flores
Vice President, Government Relations

Support of Zoning Text Amendment (ZTA) 22-01, Antenna on Existing Structure

Tuesday, September 13, 2022

1:30pm – 2:30pm

Zoning Text Amendment (ZTA) 22-01

My name is Daniel Flores, Vice President of Government Relations for the Greater Washington Board of Trade. I am here to urge you to support Zoning Text Amendment (ZTA) 22-01 to reduce the setback for antennas on existing structures from 60-feet to 30-feet. The resulting enhanced wireless networks are needed to build connected communities, foster inclusive economic growth, and improve our region's global competitiveness. We have seen firsthand the benefits of wireless connectivity across sectors including education, public safety, healthcare, transportation, and technology.

In 2018, ZTA 18-02 was passed by the County Council allowing the deployment of small cells in commercial and mixed-use areas. Then in 2021, the council passed ZTA 19-07 to allow small cell antennas in residential zones. These were critical steps to ensure the county has the wireless networks needed to keep residents and businesses connected and safe, as demand for more data and devices continues to grow at faster pace than ever before.

However, the existing zoning ordinances contain inconsistencies that are addressed by ZTA 22-01. If an applicant needs to install their equipment 30 feet from a building, they must install a new pole or a replacement pole. The use of existing poles 30 feet from a building is prohibited. The unintended consequence is that applicants are incentivized to apply for new poles or replacement poles even when there is an existing pole that works just as well. ZTA 22-01 reconciles discrepancies between new, replacement and existing poles by allowing telecommunication facilities on existing poles that are at least 30 feet away from a building. The benefits of this change include the reduced proliferation of infrastructure in the right-of-way, improved network efficiencies and better deployment options.

(Statement of Daniel Flores: Support of Zoning Text Amendment (ZTA) 22-01, Antenna on Existing Structure Continued)

The small cells enabled as a result of ZTA 22-01 will add much-needed capacity to provide the connectivity we all demand today while preparing for the future. Strong wireless networks enable distance learning for students of all ages; telehealth for patients and health care providers; employees working remotely; small businesses to thrive in the digital economy; older adults to stay in touch with family and combat social isolation; public safety personnel to utilize the best resources for our safety; and so much more.

Wireless infrastructure deployment, driven by private sector investment, will serve as an important economic boost for communities large and small across the state. According to CTIA – which represents the US wireless communication industry – the build out of 5G, the next generation of wireless coverage, will generate over \$11 billion in GDP and 34,000 new jobs for Maryland in the next ten years. 5G will transform major industries, supporting a new wave of innovation from transportation to public safety, healthcare, and education.

As a member of the MD5G Partnership representing more than 35 organizations statewide, we urge you to support Zoning Text Amendment (ZTA) 22-01 to enhance the wireless networks we depend on.



12050 Baltimore Ave
Beltsville, MD 20705

September 8, 2022

Council President
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Dear Council President:

On behalf of the MD5G Partnership, we urge you to support Zoning Text Amendment (ZTA) 22-01 to reduce the setback for antennas on existing structures from 60-feet to 30-feet. MD5G Partnership represents more than 35 organizations statewide that have come together in support of building connected communities through enhanced wireless networks. We have seen firsthand the benefits of wireless connectivity across sectors including education, public safety, healthcare, transportation, and tech.

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We urge you to support Zoning Text Amendment (ZTA) 22-01 to enhance the wireless networks we depend on.

Sincerely,

Jane Builder
Principal Manager Network Advocacy