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Mayor*

**COMMISSION FOR
HISTORICAL & ARCHITECTURAL
PRESERVATION**

Tom Liebel, Chairman



*Thomas J. Stosur
Director*

STAFF REPORT

June 12, 2018

REQUEST: Install telecommunications equipment on bell tower

ADDRESS: 2320 Mayfield Ave. – St. Matthew United Church of Christ (Baltimore City Landmark)

RECOMMENDATION: Disapprove.

STAFF: Lauren Schiszik

OWNER: Maryland Boys Choir

PETITIONER: Carlton Gilbert, T-Mobile

SUMMARY: Request to install twelve panel antennas on the bell tower, four remote radial units that will not be visible, and a fenced enclosure for equipment on the side of the building.

SITE/HISTORIC DISTRICT

Site History: The St. Matthew United Church of Christ congregation has served the spiritual and social needs of many Baltimore residents for over 150 years. The congregation was formed in Jonestown in 1852, breaking away from Trinity Evangelical Lutheran Church to embrace both Lutheran and Reformed teachings. Following several moves, in 1928 the congregation bought a lot in the Mayfield neighborhood and hired Riggins Buckler and G. Corner Fenhagen to prepare drawings for a new church. In 1929, due to financial constraints, the congregation decided to construct only the church tower, Sunday school building, and social hall. Services began in the social hall on Christmas Day 1929, and by 1951 the cornerstone of the newly constructed church was put in place. The sanctuary was completed with supervision from architect Harold Wagner of Philadelphia, who closely followed the original designs of Buckler & Fenhagen. Today the building is owned by the Maryland Boys Choir. Members of St. Matthew UCC still worship in the church, and the remainder of the complex has a dance studio and a child care center.

Site Conditions/Architectural Description: This stone Gothic Revival church, built in two phases, is an excellent example of this early 20th-century style. The bell tower was part of the original 1929 design by the Baltimore architecture firm of Buckler and Fenhagen, who designed two other Baltimore City Landmarks: Baltimore City College, and Cherry Hill Elementary School #159. The church is located at the center of the Mayfield neighborhood, where it sits on a large parcel that fronts on three streets: Mayfield Avenue, Norman Avenue, and Lake Ave. The sanctuary façade faces Mayfield Avenue, but the multiple entrances to the building are off of Norman Avenue. Thus, this secondary elevation is also considered a primary façade. The surrounding neighborhood is a designated historic district on the National Register of Historic Places, and is notable for the early 20th century single family homes and duplexes, largely designed in revival styles like Colonial Revival and Tudor Revival, but also including Italianate, Queen Anne, Craftsman bungalows and Four-squares.

BACKGROUND

- The applicant made an original permit application for the installation of eight antennae inside of a 10' tall screening box on top of the bell tower in August 2017, which staff found to not comply with the CHAP guidelines. Significant communication with staff via email, phone calls, and a site visit over the course of almost a year, resulted in several proposed alternatives such as mirrored stealth walls and smaller rooftop stealth installations. The applicant has reduced the proposed installation to this current submission. During this time, staff offered suggestions that could meet the CHAP design guidelines, such as installation inside the bell tower (discussed below), alternative sites (discussed below), or mounting antennae only on the northwest and possibly northeast faces, which are not highly visible from the two main façades of the building.
- This proposal received a conditional zoning approval for an installation; the conditions are that the placement of the antennas and related equipment be approved by the Commission for Historical and Architectural Preservation, and the applicant will adequately mitigate any adverse effects.
- The Federal Communications Commission (FCC), has oversight and provides permitting for communication installations. Thus, this project is being reviewed under Section 106 of the National Historic Preservation Act. Section 106 requires that there be consideration of potential adverse effects for any project that requires federal funding or permitting. This process typically does not prevent FCC installations; it simply requires mitigation of adverse effects. CHAP is a consulting party to the Section 106 process, but also maintains a separate, stricter regulatory purview due to the City Landmark designation.
- Per FCC regulations when there is a demonstrated gap in cellular service, the local jurisdiction is required to allow installation if there is no other location in the area from which the applicant can achieve a signal.

- Once a communications installation is approved on a property, that installation can be retained in perpetuity and staff will be legally required to allow modifications that are not considered “substantial.” It is our understanding that FCC defines “substantial” modification as alterations changing the dimensions of the installation more than 10%.
- Once communications equipment for one cellular carrier is installed on a property, FCC regulations typically require local approval of future co-location requests from other carriers, resulting in the installation of additional antennae at a particular location.

PROPOSAL & APPLICATION OF GUIDELINES

The applicant is requesting the installation of twelve antennae mounted on all four faces of the prominent bell tower – three on each elevation. Currently, the submitted plans only include eight antennae, with the intention of installing an additional four antennae at a later date, which will require approval from the Board of Municipal Zoning Appeals (BMZA). These antennae will provide cellular coverage for T-Mobile (the carrier) exclusively.

The bell tower is 87.5’ tall, with the parapet reaching 90.5’. The antennae will be mounted adjacent to the top of the bell tower so that the top of the antennae are also 87.5’ high, where they will partially obscure decorative stone banding. The antennae will be mounted onto the building through mortar joints. One type of antenna, the Air32 “Antenna Integrated Radio”, will be 4’-6” tall, 14.5” wide, and project out from the building a total of 12”. The other antenna, the RFS APXVF13-C-A20 will be 4’-8.5” tall, almost 13” wide, and project from the building approximately 14”. The proposal includes four of each of these two types of antennae. It is proposed that these antennae will be painted with plastic Krylon paint to visually mimic the stonework. This paint will require touch-up applications once every 5-7 years, according to the applicant. There will be a covered band of cables running the full height of the bell tower’s north elevation, connecting to the proposed electrical equipment inside a fenced enclosure.

Conformity to Guidelines: The relevant guidelines for this project are Chapter 1: Design Guidelines for Building Exteriors.

- Guideline 1.1 Identifying and Preserving Historic Building Fabric:
 - This guideline directs applicants to identify and retain character-defining features, such as unique detailing.
 - The highly visible bell tower, with its banded tower, is a character-defining feature of this church complex. The addition of projecting, painted antennae will alter this character-defining feature.
- Guideline 1.14.3 Telecommunications Facilities and Equipment:
 - Locate telecommunications facilities and equipment on non-historic buildings whenever possible.

- The applicant states that there are no buildings of comparable height in this general vicinity that can provide comparable cell service. The applicant states that they investigated “two other viable candidates”: the Afya Public Charter School at 2800 Brendan Avenue and the Shrine of the Little Flower Roman Catholic Church at 2854 Brendan Avenue, both located in the southeastern portion of the Mayfield neighborhood. The applicants stated that on both buildings, the antennae centerline was too low to meet their radio frequency objectives.
 - The applicant states that small cell equipment installations on light poles, a technology frequently used throughout the city including in local historic districts, does not provide sufficient coverage for the area because the 12’ light poles in this neighborhood are too short.
 - The applicant stated that a cell tower in nearby public parks, golf courses, or cemeteries was not explored because these resources were outside of their search ring and that it was unlikely that the City would approve of that installation. The City regularly approves cellular installations on city-owned property. Additionally, the nearby cemeteries are privately owned.
 - The applicants did not indicate that they had explored installations on other institutional buildings suggested by CHAP staff, such as the St. Francis of Assisi School in the northeastern portion of the neighborhood, or the Lake Montebello Elementary/Middle School to the northwest.
 - The applicant did not state if they explored two or more installations on any of the above buildings to achieve comparable or reasonable radio frequency objectives.
- Screened and stealth facilities are strongly encouraged in historic districts and on historic buildings when they will significantly minimize the impact of an installation.
 - A proposed screened installation on the top of the bell tower was determined by staff to be extremely visually intrusive and not successful.
 - Staff’s suggestion to locate the antennae inside the bell tower and install stealth bell tower louvers (used at Baltimore City College and Sharp Street United Methodist Church, both Baltimore City Landmarks) was determined by the applicant to not be a viable option at this site because the bells are still rung in the bell tower.
 - Do not damage or remove historic materials or obscure historic features when installing telecommunications facilities and equipment.
 - The installation will partially obscure the decorative banding at the top of the bell tower.

NEIGHBORHOOD COMMENTS

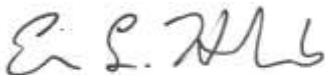
The Mayfield Improvement Association has submitted a letter of support for this proposal, subject to three conditions: that the antennae be spaced so that they correspond with the symmetry of the tower; that the most durable technique be used to ensure that the covers of the antennae not detract from the tower; and that the Commission's approval should designate the party responsible for maintaining the paint/decals on the antennae covers. The non-profit organization HARBEL Community Association, which serves over 80 neighborhoods in Northeast Baltimore, supports the Mayfield Improvement Association's stance.

ANALYSIS

CHAP staff finds that the proposed installation of twelve antennae at the top of the 87.5' tall bell tower, which will range from 4.5' to 4.75' in height, approximately 1' in width, and project out from the face of the bell tower by approximately 1', does not comply with CHAP guidelines for Telecommunications Facilities and Equipment as the antennae, while painted to mimic the stone, will obscure decorative details and be a visible alteration to a significant architectural feature. Staff also finds that the applicants have not sufficiently demonstrated that they explored all other available options for the installation of cell facilities in this area, nor did they demonstrate that those other potential sites could not provide comparable or reasonable radio frequency coverage, opting instead for their "preferred candidate." Furthermore, they have not demonstrated that the installation of the antennae inside the bell tower (which would comply with CHAP guidelines) is infeasible, as fixing or removal of the bells could allow for the use of cell antennae inside the bell tower.

Staff recommends a finding of disapproval of this proposal, as the applicant did not provide sufficient evidence that this location is the only viable location for a cellular installation, and that the proposed installation does not comply with CHAP guidelines and would result in an installation that would alter the character-defining feature of the prominent bell tower.

Staff further recommends that the applicant continue to explore other locations in the general area that are not under CHAP purview as candidates for antennae installation.



Eric Holcomb
Director

MAP AND IMAGES



Map 1– Location of site.



Map 2: Location of site in greater context.

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Image 1: Aerial view of the property from the south.



Image 2: Aerial view of the property from the north.



Image 3: View of Mayfield Ave. façade, from the intersection Mayfield Ave. and Norman Ave.



Image 4: View of Norman Ave. façade, from sidewalk on Norman Ave.



Image 5: View from Mayfield Ave.

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Image 6: View of Norman Ave. façade, from sidewalk on Norman Ave.



Image 3: View of Mayfield Ave. main entrance.



Image 4: Existing T-Mobile flush-mounted antennae installation at 3301 Belair Road.

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