

February 26, 2018

Via IZIS

Frederick L. Hill, Chairperson
D.C. Board of Zoning Adjustment
441 4th Street, N.W., Second Floor
Washington, D.C. 20001

Re: Board of Zoning Adjustment Order No. 19415A – Supplemental Facility Maintenance Plan and Permanent Restoration Plan

Dear Chairman Hill and Members of the Board:

On February 5, 2018, on behalf of Verizon Wireless (the “**Applicant**”), the Applicant for a temporary Cell on Wheels (“**COW**”) at Randall Recreation Center adjacent to South Capitol Street, S.W. (Lot 800, in Square 643E) (the “**Property**”), we submitted a Modification of Consequence to modify a condition of approval of BZA Order No. 19415 (“**Order**”) to extend the approval for six (6) months until September 15, 2018. At the Board’s February 21, 2108 public meeting, the Board requested additional details on a supplemental maintenance plan going forward for the temporary location and a permanent restoration plan to restore the site to its prior condition immediately upon termination of the COW.

I. Supplemental Maintenance Obligations until September 15, 2018

a. Original Maintenance Plan

It’s important to understand the actions taken to date under the current maintenance plan. The current maintenance plan (Ex 36C, in Application 19415) provides the following:

Overview: The Verizon Wireless temporary antenna installation at the Randall Rec Ball Field is designed to require nominal maintenance and service. The facility is unmanned and hard wired directly to municipal electric and telephone service. All equipment will be enclosed by fencing to mitigate easy access to the facility and limit exposure to the drip line (or ice) from the antennas/tower.

- i. A Verizon Wireless representative will access the facility every 10-14 days to assess the proper functioning of the facility.
- ii. The emergency generator will be exercised, no more than once a week and for not more than 1 hr. at a time to confirm operability.
- iii. Verizon Wireless will post an appropriate on the exterior of the site with identification information and a toll free 800 number for the public to report any issues or concerns regarding the site. The number (866-862-

4404) is manned 24/7 and will dispatch Verizon Wireless representative to the site.

- iv. If equipment is necessary to address the landscape/hardscape immediately abutting the installation, scheduling will be coordinated with the District of Columbia Department of Parks and Recreation in order to eliminate any interference to the ongoing operation of the ball field.
- v. Service and maintenance inside the equipment trailer will be performed on an “as-needed” basis and will not affect to overall visual attributes of the installation.
- vi. Upon completion of the term of the installation, all equipment brought onsite will be removed and any impacted areas will be addressed.
- vii. Depending on the underlying conditions, the area would be graded, seeded and/or sodded to reclaim the area to its original condition as reasonably possible.

b. Actions Taken to Consistent with the Maintenance Plan

Verizon Wireless understands the importance of continued maintenance at the site and believes that all of the above actions have been undertaken consistent with the Maintenance Plan. Verizon Wireless does understand that several issues with weeds and graffiti were noted by the Board at its February 21st meeting. Over the past year, Verizon personnel regularly visited the site and dealt with any problems such as overgrown grass and graffiti. In terms of weeds, the standard procedure is to install a ground barrier (geotex fabric) within the compound which is then topped with gravel in order to prevent the vegetation from growing. During the course of this installation, landscapers visited the site on three different occasions to manage the growth of vegetation in the compound. On the third visit it was deemed that the barrier was unsuccessful in managing the vegetation and the chemical intervention was utilized. The weed spray used only eliminated the grass that it touches and does not permanently damage or contaminate the ground.

II. Supplemental Actions to Ensure Compliance with the Maintenance Plan

Subsequent to the February 21st Board meeting, Verizon Wireless representatives visited the site on February 22, 2018. As noted in the attached pictures from that date, Verizon Wireless did not find any substantial evidence of damage to the area from truck tires and the weeds were not overgrown (pictures 4-6). The site is only accessed by small pickup trucks and can only be accessed through the access easement provided by the Department of Parks and Recreation. There were slight ruts on either side of the sidewalk in one area which will be planted with grass or sod (picture 8). Importantly, as show in the attached pictures, the ball field is undisturbed.

The February 22nd site inspection did verify the graffiti mentioned at the hearing (picture 7). Verizon on February 26, 2018 resprayed the area (see pictures 11 and 12) and will monitor on a weekly basis for weeds and graffiti and any related maintenance issues. Going forward, to ensure that all issues are addressed timely, the site will be visited on a weekly basis and any maintenance concerns will continue to be addressed promptly until the COW is removed.

III. Permanent Restoration Plan

Once the new permanent site is ready for operation, but no later than September 15, 2018, Verizon Wireless will begin the process for restoration of the site. The specific steps in this process are as follows:

Best Western Temporary Site – Demo/Restoration Scope and Schedule

Date	Day #	Time	Task	Picture Reference
TBD	Day 1	6am to 4pm	Remove antennas and cable off tower.	
	Day 1	6am to 4pm	Disconnect and remove AC Power and Fiber. (no trenching required)	
	Day 1	6am to 4pm	Remove compound fence.	
TBD	Day 2	6am to 4pm	Open baseball field chain link fence. Install wooden crane mats across the baseball field. Bring in crane and trailers and uninstall the tower. Bring in tractor to remove the COW. Remove crane mats from baseball field. Reinstall baseball field chain link fence.*	Pic 1 Pic 2
TBD	Day 3- Day 4	6am to 8pm	Bring in small loader to remove all of the gravel off the site. Remove all disturbed ground where grass has dead, and bring in new dirt that is suitable for planting. Bring all areas associated with the tower back to finished grade.	
	Day 4	6am to 8pm	Repair an ruts caused by support vehicles along both side of the sidewalk.	Pic 3
TBD	Day 5	6am to 8pm	Landscaper will install sod, approved by DC DPR	
	Day 5	6am to 8pm	Since this is an active park and sports venue, a temporary fence will be installed around newly sodded areas in order to prevent pedestrian disturbance.	
TBD	As Needed	6am to 4pm	Contractor will water sod as needed to insure grass growth.	
TBD	As Needed	6am to 4pm	Contractor will patch or re-sod any area that remain bare.	
TBD	As Needed	6am to 4pm	Contractor will coordinate with and received final approve from DRP related to newly planted areas.	
TBD	As Needed	6am to 4pm	Contractor will remove temporary fence once grass if fully established.	
TBD	Day 30	6am to 4pm	Follow up inspection will be performed and documented in order to insure that all grass has germinated and that the park has been returned to the former standard.	

*Access through the ball field will be coordinated with DPR in order to avoid the disruption of any preplanned event at the park.

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IV. SERVICE ON PARTY

In the instant case, this extension request is being served simultaneously on all parties to the original application for BZA Case No. 19415, which includes the Office of Planning, ANC 6D, and Brian Friedman.

V. CONCLUSION

As noted above, we believe that the Applicant's Supplemental Maintenance Plan and Permanent Restoration Plan adequately addresses the Board's concerns that the site will be appropriately maintained and restored.

We would be happy to produce any other information or evidence in support of the above letter and greatly appreciate your consideration of this matter.

Sincerely,



John T. Epting



Picture 1: Installation photo showing the opening of the ball field fence and the crane mats.



Picture 2: Installation photo showing wooden crane mats.



Picture 3: Example of effective rut restoration.



Picture 4 – Looking south toward the compound. Photo taken 2/22/201



Picture 5 – Looking northwest toward the compound. Photo taken 2/22/2018



Picture 6 – Looking northeast toward the compound. Photo taken 2/22/2018



Picture 7: Graffiti on compound fence. Photo taken 2/22/2018. Fence was re-painted on 2/26/18.



Picture 8 – Showing minor trend damage. Photo taken on 2/2/2018. Area will be restored using sod.



Picture 9 – Showing compound overgrowth in July 2017.



Picture 10 – Showing mitigated compound. Photo taken July 2017



Picture 11 – Graffiti painted over – 2/26/18

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Picture 12 – Graffiti painted over – 2/26/18



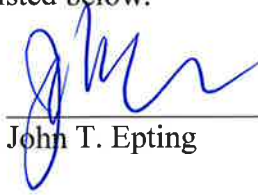
Google Street view image, captured September 2017



Google Street view image, captured October 2017

Certificate of Service

I certify that on February 26, 2018, I delivered a copy of the foregoing document via hand delivery or U.S. mail to the addresses listed below.



John T. Epting

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