

**MEMORANDUM**

**TO:** District of Columbia Board of Zoning Adjustment  
**FROM:** Karen Thomas, Case Manager  
*JS for*  
 Joel Lawson, Associate Director Development Review  
**DATE:** April 26, 2019

**SUBJECT:** BZA Case 20006: Special Exception application of T-Mobile Northeast LLC, pursuant to 11 DCMR Subtitle X, Chapter 9, under the use permissions of Subtitle C § 1313.2, to erect a monopole in the RA-1 Zone at premises 3675 Ely Place S.E. (Square 5438, Lot 801)

**I. OFFICE OF PLANNING RECOMMENDATION**

The Office of Planning (OP) recommends **approval** of the following:

- Special exception pursuant to Subtitle X, § 900.2 from Subtitle C § 1313.2 for a monopole at 81 feet 6 inches in height

Subject to the condition that the applicant provided the information required by section 1313.10 prior to any action by the Board.

**II. LOCATION AND SITE DESCRIPTION**

Address	3675 Ely Place S.E.
Applicant	T-Mobile Northeast, LLC
Legal Description	Square 5438, Lot 801
Ward / ANC	Ward 7; ANC 7F
Zone	RA-1 – Intended to permit moderate-density residential and institutional uses
Historic District	The property is located within the Fort Circle Park Historic District.
Lot Characteristics	The 379,868 square feet property is flat and irregularly shaped, abutting Ely Place to the north, and primarily recreational uses to the south east and west, including Fort Dupont Park.
Existing Development	The property is developed with baseball fields and a two story recreational building.
Adjacent Properties	The adjacent properties are primarily unzoned lands owned by the Federal Government including Fort Dupont Park. Kimball Elementary School abuts the property to the west.

Surrounding Neighborhood Character	The surrounding neighborhood is a mix of residential, school and recreational uses with in the RA-1 and R-3 zone northwest of the site.
Proposed Development	T-Mobile intends to replace an existing 71- feet tall light pole with a monopole at 81 feet 6 inches in height. The new monopole would accommodate the light installation of the former light pole and an antenna array for T-Mobile.

**III. OFFICE OF PLANNING ANALYSIS**

Subtitle C Section 1313.2 - A monopole may be permitted as a special exception use in the R, RF, RA, MU, D and PDR (except PDR-4 and PDR-7, where antenna towers are permitted as a matter-of-right) zones, and the zones of Subtitle K, where monopoles are permitted as a matter-of-right subject to Subtitle C § 1309.

**Special Exception Relief pursuant to § 1313.1 – Monopoles Subject to BZA Approval**

**i. Special Conditions/Criteria**

Section	Criteria	OP Response
§1313.5	<i>The location, height, and other characteristics of an antenna tower or monopole shall be:</i>	-
(a)	<i>Consistent with the purpose of this chapter;</i>	The location of the monopole within the residential zone district is consistent with the purposes of the chapter, which are to ensure the safety of the population and to minimize their impact on the aesthetic interests of the District of Columbia (C-1300.1)
(b)	<i>Designed and available for collocation by other service providers;</i>	The proposed monopole would be designed for collocation of the light fixtures and up to two antenna arrays, one of which will be used by T-Mobil
(c)	<i>Located so the visual impacts are minimized to the greatest practical extent, from neighboring property and adjacent public space, or appropriately screened by landscaping or other techniques to minimize the visibility of the antenna tower or monopole; and</i>	The monopole is located well away from residential properties. It would be minimally visible from public space due to its location well within the ball field and approximately 150 feet away from Ely Place. Its visibility from Ely Place would be indistinguishable from the existing light poles. (See Exhibit 3.)
(d)	<i>Designed and constructed to preserve existing trees to the greatest practical extent.</i>	The immediate area around the monopole has gravel and is without trees. There are some trees along the driveway between the ball fields and the

Section	Criteria	OP Response
		tennis courts which will not be altered by the monopole.
§1313.6	<i>If an applicant is unable to meet the special exception requirements of section, the Board of Zoning Adjustment may nevertheless grant the application if the applicant demonstrates that: (a) through (g)</i>	Not applicable. The installation is able to satisfy the criteria, as follows:
§1313.7	<i>Any antenna tower or monopole with a proposed height in excess of that permitted by the Act of June 1, 1910 (36 Stat. 452), as amended, shall not be permitted, unless the height is approved by the Mayor or his or her designee</i>	The height of the monopole is proposed at 81' 6" and the maximum height with the antennas is 85 feet; thus, it would not exceed the 110 feet permitted under the Height Act.
§1313.8	<i>An antenna tower or monopole shall be set back a minimum horizontal distance equal to its total height as measured from the ground, from any residentially developed or zoned property.</i>	The monopole is setback approximately 150 feet from Ely Place, SE and over 100 feet from the school property to the west and north of the site. However, the property itself is zoned RA-1 Residential Apartment.
§1313.9	<i>Each part of an antenna tower or monopole shall be set back from each lot line the greater of the following: (a) Twenty feet (20 ft.); or (b) A distance of at least one-third (1/3) of the total constructed height.</i>	The monopole is required to have a minimum setback of 27 feet and would be set back to meet this requirement from the western property line of the irregularly shaped lot. The proposed monopole would conform to the setback requirements.
§1313.10	<i>The Board of Zoning Adjustment shall submit the application to the Office of Planning for review and report.</i>	The application was provided to OP.
§1313.10	<i>The applicant shall provide written and/or graphic documentation of the following: (a) The area to be served by the proposed new antenna tower or monopole; (b) The area being inadequately served; (c) A map indicating the location of any other antenna or related facility sites providing service by the applicant within a two (2)-mile radius, including public space, of the proposed site; (d) Other towers or monopoles within a two (2)-mile radius of the proposed site with identified heights above grade;</i>	(a), (b), (c): The service area map for the existing installation is <b>not included</b> in the record to date. The applicant stated to OP that there are no existing structures within the area surrounding the proposed site that would allow T-Mobile to collocate and meet its coverage objectives. The record should be supplemented by the applicant prior to the hearing.

Section	Criteria	OP Response
	<p><i>(e) An explanation of why the applicant cannot collocate on an existing tower or monopole;</i></p> <p><i>(f) A written statement agreeing to permit the collocation by other service providers on a commercial basis on an antenna tower;</i></p> <p><i>(g) A written statement agreeing to design a proposed monopole for at least three (3) antenna arrays and to make the array space available on a commercial basis for collocation by any telecommunications service provider whenever unused by the initial telecommunications service provider(s);</i></p> <p><i>(h) The topographic conditions of the area to be served;</i></p> <p><i>(i) The relative height of the antenna tower or monopole to the tops of surrounding trees within one-quarter mile (.25 mi.) radius of the proposed site as they presently exist;</i></p> <p><i>(j) The proposed appearance of the antenna tower or monopole, including exterior finish;</i></p> <p><i>(k) A maintenance plan explaining how the property manager will control ice build-up, falling ice, and potential falling debris; the plan should also address how inoperative antennas will be removed; and</i></p> <p><i>(l) Other information as may be necessary for impact assessment of the antenna tower or monopole.</i></p>	<p>(d) At the writing of this report, this information is <b><u>not provided</u></b>. The applicant will supplement the record prior to the hearing.</p> <p>(e) There are no monopoles available within the applicant’s coverage area.</p> <p>(f) (g) The existing monopole’s height and construction <b><u>would not be designed</u></b> to support at least three wireless carriers and related antenna arrays. At this location the monopole’s height for three carriers would be out of character with the existing neighborhood and well exceed the height of existing light poles.</p> <p>(h) The information has <b><u>not been provided</u></b> in the application. The applicant intends to provide this information at the hearing.</p> <p>(i) At 81feet, the proposed monopole and the existing light poles would be taller than the closest set of trees within Fort Dupont Park, south of the site, and other trees observed in the area.</p> <p>(j) The existing pole’s exterior finish would be silver coating typical of wireless installations.</p> <p>(k) The applicant states that the 200 square feet unmanned facility would be enclosed by a 10-foot high board-on-board fence, to prevent unwanted entry into the monopole compound. A technician would be assigned to site visits approximately once per month for routine inspection and maintenance of the monopole.</p> <p>Thus, falling debris and ice during the winter months is anticipated within the boundaries of the enclosed facility and maintenance of the facility would be ongoing.</p> <p>(l) OP does not require additional information for impact assessment due to the pole’s location within the compound but recommend that the information required by this section be provided.</p>

**ii. Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?**

Based on the satisfaction of the above criteria and conditions, the proposed conversion of the light pole to a monopole use for T-Mobile’s use in this location would be in harmony with the intent and purpose of the Zoning Regulations.

**iii. Would the proposal appear to tend to affect adversely, the use of neighboring property?**

The proposal should not adversely affect the use of neighboring property as it is a use presumed compatible within this zone district. The proposed monopole would be located closest to tennis courts, another recreational use and would not affect residential uses.

**IV. COMMENTS OF OTHER DISTRICT AGENCIES**

At the writing of this report, other District agencies’ reports were not included in the record.

**V. COMMUNITY COMMENTS**

At the writing of this report, the ANC 7F’s comments were not included in the record.

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**ZONING MAPS and VIEWS**



