

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
JL Joel Lawson, Associate Director Development Review
DATE: July 15, 2019
SUBJECT: BZA Case 20006: **SUPPLEMENTAL**

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)

At the public hearing on June 26, 2019, the Board requested the applicant address the criteria under C § 1310.10 (g) which requires ... *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).*

At the Board's Public Meeting on July 3, 2019 the record was reopened for OP to provide additional clarification regarding this criteria for collocation.

The intent of this provision is to minimize the need for multiple monopoles, particularly in residential neighborhoods where a monopole's height and structure may have a greater visual impact. The regulation per C §1313.6 (e) also states that - *the height and other physical design characteristics of the proposed antenna tower or monopole do not exceed those which are minimally necessary to fill the gap in wireless service.*

In this case, the requirement for collocation is outweighed by the intent of the Regulations expressed under C § 1300, which is to minimize the visual impact of a taller and larger structure on the site, within the residential neighborhood. A taller and structurally larger pole at approximately 112 feet would be required to accommodate up to three carriers on a single monopole and would not be as easily disguised as a light pole among other light poles around the field. Thus, at this location, the monopole's height for three carriers would be visibly out of character with the existing neighborhood, well exceeding the height of existing light poles on the property, as well as neighborhood structures.

Placement of additional antennas on the proposed monopole at 50 feet and up to 71 feet may be possible (depending on a carrier's need) and would not be precluded by the regulations because the height of the monopole would not be increased. Such an installation would comply with C §1308.3 and 1308.2 which states: *An antenna shall not be mounted on an antenna tower or monopole if, as a result of its installation:*

(a) *The size of the antenna tower or monopole is increased; or*

(b) The appearance of the antenna tower or monopole is changed in a manner that adversely impacts the surrounding area.

The regulations provide criteria to weigh the attributes of any proposed installation with the intent of the regulations. Therefore, OP supports the applicant's request to waive criteria C § 1313.11 (f)-(g) and amends the recommendation in its original report of Exhibit 20 as follows (new language in **BOLD**):

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~~ **to replace an existing light pole with a monopole at a maximum height of 82 feet;**