

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
JL Joel Lawson, Associate Director Development Review

DATE: May 7, 2025

SUBJECT: BZA Case 20566A: Modification without Hearing, pursuant to Subtitle Y§ 703, and Subtitle C § 1313.2, to extend an existing monopole at 1800 Perry Street N.E.

I. BACKGROUND

The Board granted a summary order, (Order 20566 - *December 8, 2021*) for special exception relief pursuant to Subtitle C § 1313 to raze an existing monopole and construct a new pole. The current modification without hearing, BZA 20566A, requests an extension of the approved 84-feet height to 99 feet.

Subtitle Y § 703.7 provides that “*a modification without hearing*” is a modification in which the impact may be understood without witness testimony, including, but not limited to a proposed change to a condition cited by the Board in the final order, or a redesign or relocation of architectural elements and open spaces from the final design approved by the Board.
Determination that a modification can be approved without witness testimony is within the Board’s discretion.

The Department of General Service (DGS) requested T-Mobile’s immediate removal of an existing installation at Burroughs Elementary due to its modernization (See [Exhibit 9, page 3](#)). As such, the Applicant has requested extension of the existing monopole at 1800 Perry Street NE, a block away from Burroughs Education Campus (1820 Munroe Street NE), to maintain service for the neighborhood with minimum interruption.

II. 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 an extension of the 84 feet monopole to 99 feet in height.

III. LOCATION AND SITE DESCRIPTION

Address	1800 Perry Street N.E.
Applicant	AT&T
Legal Description	PAR 0157 0026 (District-owned property)

Board of Zoning Adjustment
District of Columbia

Ward / ANC	Ward 5; ANC 5B
Zone	R-1-B – Intended to permit low-density residential and institutional uses
Historic District	N/A
Lot Characteristics	The 338,823 square feet District-owned property is flat and irregularly shaped, abutting Perry Street along a northeast property line, South Dakota Avenue on its southeast property line, and 20 th Street to the east, Otis Street to the south and a north-south alley to the west property line.
Existing Development	The property is developed as a recreational athletic field complex known as the Dwight A Moseley Sports Complex.
Adjacent Properties	There are residential homes fronting 18 th Street NE west. Across Perry Street is a District owned property developed with a school building.
Surrounding Neighborhood Character	The surrounding neighborhood is a mix of residential, school and recreational uses within the R-1-B zone.
Proposed Development	AT&T intends to extend an existing 85-foot tall monopole to 99 feet in height . The modified monopole would accommodate the another carrier's cell site (T-Mobile) which is currently located at Burroughs Elementary School. This school is scheduled for school modernization and would not accommodate the cell site due to pending demolition on the site.

IV. 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 proposed temporary monopole within a residential zone district is consistent with the purposes of the chapter, which are to allow necessary antenna facilities, while minimizing their visual (C-1300.1). The proposed pole would not be significantly different in height than the pole as it exists today. OP does not anticipate an adverse visual impact beyond what currently exists.

Section	Criteria	OP Response
(b)	<i>Designed and available for collocation by other service providers;</i>	The proposed monopole was designed for collocation of the light fixtures and up to two additional carriers, one each at 66 feet and 56 feet. The proposed addition would accommodate another carrier as desired under the regulations.
(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. While it is visible from public space it is located well within the ball field and approximately 200 feet away from Otis Street, where there are street trees that obstruct views during the Spring and Summer months.
(d)	<i>Designed and constructed to preserve existing trees to the greatest practical extent.</i>	The immediate area around the monopole is without trees. There are some trees on the periphery of the sports field, including the ball fields and the tennis courts which will not be altered by the monopole. The equipment area for the monopole is fenced and this would not be altered.
§1313.6	<p><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:</i></p> <p class="list-item-l1">(a) <i>There is a significant gap in wireless service;</i></p> <p class="list-item-l1">(b) <i>The proposed <u>antenna tower</u> or <u>monopole</u> will fill this gap;</i></p> <p class="list-item-l1">(c) <i>No other mounting options are available;</i></p> <p class="list-item-l1">(d) <i>The site is the only location from which the gap can be filled or, if other sites are available, the antenna tower or monopole at the proposed location will generate the least adverse impacts;</i></p> <p class="list-item-l1">(e) <i>That the height and other physical design characteristics of the proposed antenna</i></p>	<p>The installation would continue to satisfy the criteria, including:</p> <p class="list-item-l1">(a) The applicant's responsibility is to continue providing the District's First Net emergency coverage and improve coverage in the surrounding area.</p> <p class="list-item-l1">(b) The extended pole would maintain coverage area if collocation were permitted.</p> <p class="list-item-l1">(c) No other mounting options are available for collocation. The subject monopole is within a two-mile radius, including one block away from Burroughs Education Campus where T-Mobile's antennas must be removed due to the campus modernization.</p> <p class="list-item-l1">(d) At this location, the pole would generate the least visibility impact, since an 84 feet pole exists, while the request for an additional 15 feet would satisfy the coverage needs as outlined in the applicant's submission.</p>

Section	Criteria	OP Response
	<p><i>tower or monopole do not exceed those which are minimally necessary to fill the gap in wireless service;</i></p> <p><i>(f) That it is using the least intrusive means to provide wireless service necessary to fill the gap in such service; and</i></p> <p><i>(g) That the proposed antenna tower and monopole, even when supporting all possible co-locators will be in full compliance with Federal Communication Commission cumulative and individual RF emission levels.</i></p>	<p>(e) The pole's addition is the minimum height to provide the required coverage. The applicant has abided by the prescribed limits of the Height Act and does not need a waiver from the Act.</p> <p>(f) The addition to the monopole to provide a collocation opportunity would be less intrusive visually thus presenting negligible impacts on the surrounding neighborhoods than the addition of another standard monopole fixture. .</p> <p>(g) The pole will continue to comply with all FCC requirements, as required.</p>
§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 monopole's height is proposed at 99 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>	Based on prior record under 20566, the existing monopole is set back approximately 200 feet from the closest residential property to the south across Otis Street, which is twice the height of the modified pole.
§1313.9	<p><i>Each part of an antenna tower or monopole shall be set back from each lot line the greater of the following:</i></p> <p><i>(a) Twenty feet (20 ft.); or</i></p> <p><i>(b) A distance of at least one-third (1/3) of the total constructed height.</i></p>	The proposed modified monopole would conform to the setback requirements. It is set back 390 feet from the west property line, 376 feet from the north property line, 368 feet from the east property line, and 135 feet from the south property line. These setbacks exceed the minimum 33 feet setback under this section.
§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.
§1313.11	<p><i>The applicant shall provide written and/or graphic documentation of the following:</i></p> <p><i>(a) The area to be served by the proposed new antenna tower or monopole;</i></p> <p><i>(b) The area being inadequately served;</i></p> <p><i>(c) A map indicating the location of any other antenna or related facility sites providing</i></p>	(a), (b), (c): The applicant stated to OP that there are no other existing structures within the area surrounding the proposed site that would allow the carrier to collocate and meet its coverage objectives.

Section	Criteria	OP Response
	<p><i>service by the applicant within a two (2)-mile radius, including public space, of the proposed site;</i></p> <p><i>(d) Other towers or monopoles within a two (2)-mile radius of the proposed site with identified heights above grade;</i></p> <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>(d) (e) The applicant's statement – under Application 20566 which permitted the original tower at Order 20566 Exhibit 8, pages 56, 57 – provided two locations including a stealth flagpole at Burroughs Education Campus and a tower in Brentwood with the desired height at 88 feet and 92 feet.</p> <p>Since the Burroughs campus would be under modernization as stated prior, the Brentwood tower cannot accommodate the required number of antennas due to the pole's limitations and due to its distance outside the coverage gap.</p> <p>(f) AT&T has certified it will allow other commercial telecommunications providers to collocate if possible and it is now doing so.</p> <p>(g) As approved – the monopole was permitted up to three carriers under the original Order.</p> <p>(h) The applicant provided a topographical map of the area to be served under 20566. Since T-Mobile is already in the neighborhood, the coverage is intended to remain the same for the neighborhood on the extended pole, a block away from its original location.</p> <p>(i) At 99 feet, the modified monopole would be taller than the closest set of trees (approximately 45-60 feet) within the neighborhood, south of the site, and other trees observed in the area.</p>

Section	Criteria	OP Response
	<p>(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</p> <p>(l) Other information as may be necessary for impact assessment of the antenna tower or monopole.</p>	<p>(j) The existing pole's exterior finish would remain as approved - silver coating typical of wireless installations.</p> <p>(k) The unmanned equipment facility would continue to be secured by fencing and shrubbery to prevent unwanted entry into the equipment compound.</p> <p>(l) OP does not require additional information for impact assessment due to the pole's location within the compound.</p> <p>OP determined that the proposed change in height of the monopole to support a desired collocation would not adversely impact the neighborhood nor would it change the material facts upon which the original approval was granted.</p>

ii. Special Exception Review Standards: Subtitle X § 901

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 modification of the monopole to accommodate T-Mobile's collocation would be in harmony with the intent and purpose of the Zoning Regulations. It would not be appreciably different in height from the existing and it would satisfy the regulations desire to reduce the need for other poles in the community.

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 provided the conditions are adequately met. The existing monopole is located closest to the ball field courts, and other recreational use and would not adversely affect residential uses.

V. COMMENTS OF OTHER DISTRICT AGENCIES

Other District agency reports were not included in the record.

VI. ANC COMMENTS

As of the date of this report, the ANC had not submitted comments to the record.

VII. COMMUNITY COMMENTS

Community comments had not been added to the record to date.

LOCATION MAP



