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VIA IZIS

Chairman Fred Hill
D.C. Board of Zoning Adjustment

Re: BZA Case No. 20571B – Applicant’s Supplemental Statement

Dear Chairman Hill and Members of the Board:

The above-referenced case is scheduled for a public hearing on November 6, 2024. This application extends the expiration date of BZA Case No. 20571A by nine (9) months to ensure continuous coverage in the Congress Heights neighborhood. The Office of Zoning requested on November 4, 2024, that the Applicant supplement the record to include an analysis of the project's compliance with the special exception standards. The Applicant notes that an in depth analysis of the special exception standard is included in the application materials provided in Case No. 20571, in Exhibits 8 and 41. Nevertheless, for ease of reference and in response to the Office of Zoning’s request, the Applicant addresses the special exception criteria below.

1. Special Exception Criteria

The temporary monopole continues to satisfy the criteria and conditions of Subtitle C § 1313 and Subtitle X § 901.2 as determined by the Board in Order No. 20571. The temporary monopole will provide continuous service to the Congress Heights neighborhood until a new facility is operational. The monopole is located on the Ferebee Hope Campus, and is separated from neighboring residential uses and will not adversely affect the use of the neighboring properties. No new relief is requested, and the monopole continues to operate as previously approved in BZA Case No. 20571.

A monopole may be permitted as a special exception use in the RA-1 zone, pursuant to Section Subtitle C § 1313.2. The location, height, and other characteristics of an antenna tower or monopole shall be consistent with the purpose of this chapter, designed and available for collocation by other service providers, 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,

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and designed and constructed to preserve existing trees to the greatest practical extent. Here, the temporary installation meets all the requirements of Chapter 13, absent the property line setback requirement, so it is consistent with the purpose of this chapter. While the monopole is not designed and available for collocation by other service providers, it is exempted from this requirement because it is temporary in nature and only 73 feet. The visual impacts of the monopole are minimized to the greatest practical extent by fencing, which limits views from neighboring property and adjacent public space. Finally, no trees are affected by the continued operation of the monopole.

While the temporary monopole does not meet the required setback of 24 feet and continues to require relief from that requirement, the application demonstrates that there would otherwise be a significant gap in wireless service without the temporary installation because coverage by the remaining telecommunications facility is limited. Importantly, the community will not suffer any disruption in its cell service thanks to the temporary monopole; there are no alternative mounting options of significant height on which Verizon can collocate. This temporary location will have the least adverse impacts because Verizon already has antennas at this location and temporary collocation is required to avoid a gap in coverage. At 73 feet, the monopole is the minimum height required to achieve the desired coverage as determined by Verizon's RF engineers. Despite noncompliance with the setback requirement, the impact of the monopole is limited because it is set back at least 1:1 from all adjacent properties, with the closest neighboring property being 93 feet away.

The proposed monopole will continue to comply with the Federal Communication Commission cumulative and individual RF emission levels and Height of Buildings Act of 1910. Because the temporary monopole is at least 93 feet from the closest residential use, it is set back a minimum horizontal distance equal to its total height of 73 feet. As noted above, the visual impacts of the monopole are minimized to the greatest practical extent by fencing, which limit views from neighboring property and adjacent public space. Despite efforts to identify a neighboring tower, the Applicant cannot collocate on an existing tower or monopole because there are no existing tower or monopole structures within proximity to the temporary location. Therefore, a temporary installation at this location is essential to avoid any gap in coverage.

We look forward to presenting this application to the Board. If you or your staff have any questions prior to the public hearing, please do not hesitate to contact either of us.

Sincerely,

_____/s/
Christine Roddy

_____/s/
Derick Wallace

The undersigned hereby certifies that they delivered copies of the foregoing document by electronic mail to the following addresses on November 5, 2024.

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