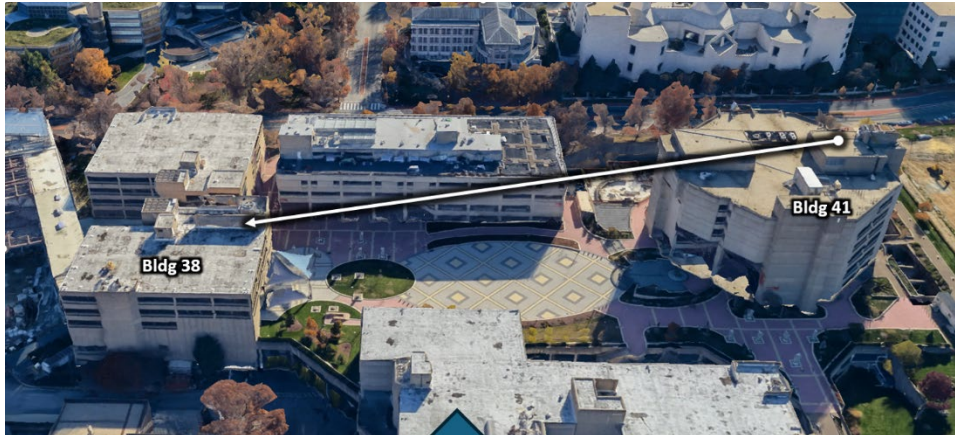


BOARD OF ZONING ADJUSTMENT

Public Safety Radio site antenna installation at UDC, 4200 Connecticut Av. NW (Square 1964, Lot 0812)

- Application No. 21234 of District of Columbia Department of General Services
 - ANC 3F
 - Type of Relief: Special Exception from:
 - Building-mounted antenna requirements of Subtitle C § 1305.1 (pursuant to Subtitles C §§ 1305.2 and 1312, and Subtitle X § 901.2)
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This statement is submitted by the Department of General Services ("DGS" or "Applicant") in support of its application pursuant to Subtitle X § 901.2 of the Zoning Regulations for special exception approval under Subtitle C §§ 1305.2 and 1312 to install six (6) building-mounted antennas affixed to the rooftop mechanical enclosure of UDC Building 38 located at 4200 Connecticut Avenue, NW (Square 1964, Lot 0812) (the "Property"), with each antenna having a total mounted height exceeding the top of the screen wall to which it is mounted, the limited established by Subtitle C § 1305.2.



As background, since 2003, the Office of Unified Communications ("OUC") has operated and maintained an active radio site on the rooftop of UDC Building 41 which is currently undergoing abatement to make way for the new Archives building. In 2024 an alternate location for a new radio site was identified in Building 38 within the same campus. As such, DGS filed two separate permits (AN2400076 and AN2400077) for the installation of 2 different types of antennas.

These antennas form an integral part of OUC's public safety radio infrastructure which supports all District emergency (911) and non-emergency (311) call center radio communications.

The radio site within the UDC campus provides centralized, District-wide coordination and management of public safety voice radio technology and other public safety wireless and data communication systems and resources. A loss of a radio site or compromised antenna configuration could severely affect the ability for first responder mission critical radio communications with their command center and 911 dispatchers. The UDC radio site is part of the OUC radio system and provides radio coverage in the northwestern part of the District which includes foreign embassies, universities (including UDC), and area residents.

With the impending Presidential Inauguration, the new radio site had to be completed and fully operational by January 20, 2025. Thus, DGS filed for permits in the Spring of 2024 to allow time for permit issuance and construction. Permit filing and subsequent approval of the installation of two (2) reception antennas, and four (4) panel antennas used for transmission, are identified in the drawings included with the application.

I. BUILDING-MOUNTED ANTENNA REQUIREMENTS

In furtherance of its efforts to relocate the radio site from Building 41 to Building 38 DGS filed 2 antenna permits with the District of Columbia Zoning Administrator, who confirmed that the proposed antennas are appropriately categorized as building-mounted antennas given that they all are attached to the walls of the building's rooftop structure, as shown in the drawings included with the application.

Pursuant to Subtitle C § 1305.1 all building-mounted antennas, shall comply with the following conditions:

(a) The top of the antenna shall not extend above the top of the wall, or roof of the building or structure to which it is mounted;

As shown in the drawings, the antennas extend above the top of the structure to which it is mounted. As a result, DGS respectfully requests special exception approval from this requirement, as is further discussed below.

(b) Each antenna installation shall be located or screened such that its visibility from public spaces, navigable waterways, historic landmarks, and national monuments is minimized to the greatest practical extent;

The antennas are minimized to the greatest practical extent as their unobstructed heights are required to transmit and receive critical public safety communications from all directions of the building. The 2 receiving antennas are of the cylindrical pole variety and each measures only approximately 3 inches in diameter. Given their verticality and very slim profile, the antennas are visually unobtrusive.

Finally, the nature of the present application is the installation of mission-critical antennas (identical to the ones in Building 41) in Building 38 within UDC campus. The existing antennas atop Building 41 are being removed.

(c) An antenna shall be constructed of materials and colors that blend with the surroundings to the greatest practical extent or shall be screened and/or painted to blend with the surface to which the antenna is attached;

As noted in the pictures, the antennas are constructed of materials and colors to blend to the extent practical with their surroundings. The antennas have a slender upright appearance and are constructed of light-colored material intended to minimize contrast with the background sky.

(d) A building-mounted antenna placed on a penthouse or rooftop structure with a rooftop outdoor recreation space shall be secured from unauthorized access for a minimum vertical distance of ten feet (10 ft.); and

(e) Any related equipment cabinet or shelter that is not internal to the building or penthouse shall be:

(1) Constructed of materials and colors that blend with the building or penthouses or rooftop structures; and

(2) Located to reduce its visibility from public space to the greatest practical extent.

This requirement is not applicable to the Property as there is not any cabinet or shelter proposed for the exterior of the building.

II. SPECIAL EXCEPTION APPROVAL

A. Building-Mounted Antennas Extending Above the Top of the Structure to Which it is Mounted (Subtitle C § 1305.1(a)) – Compliance with Standards

DGS seeks special exception approval under Subtitle C § 1305.1(a) to permit the location of two (2) receiving antennas, each with a total mounted height measuring approximately 20 feet 6 inches above the top of the rooftop structure. Likewise, DGS seeks approval to permit the location of four (4) building-mounted transmission antennas measuring approximately 9 feet above the screen wall or parapet.

Pursuant to D.C. Code §6-641.07(g)(2) and Subtitle X § 901.2, the Board is authorized to grant a special exception where it finds the special exception will be in harmony with the general purpose and intent of the Zone Plan and will not tend to adversely affect the use of neighboring property, subject in each case to the special conditions specified. Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning classification, provided the specific regulatory requirements for the requested relief are met. In reviewing an application for special exception relief, “[t]he Board’s discretion...is limited to a determination of whether the exception sought meets the requirements of the regulation.

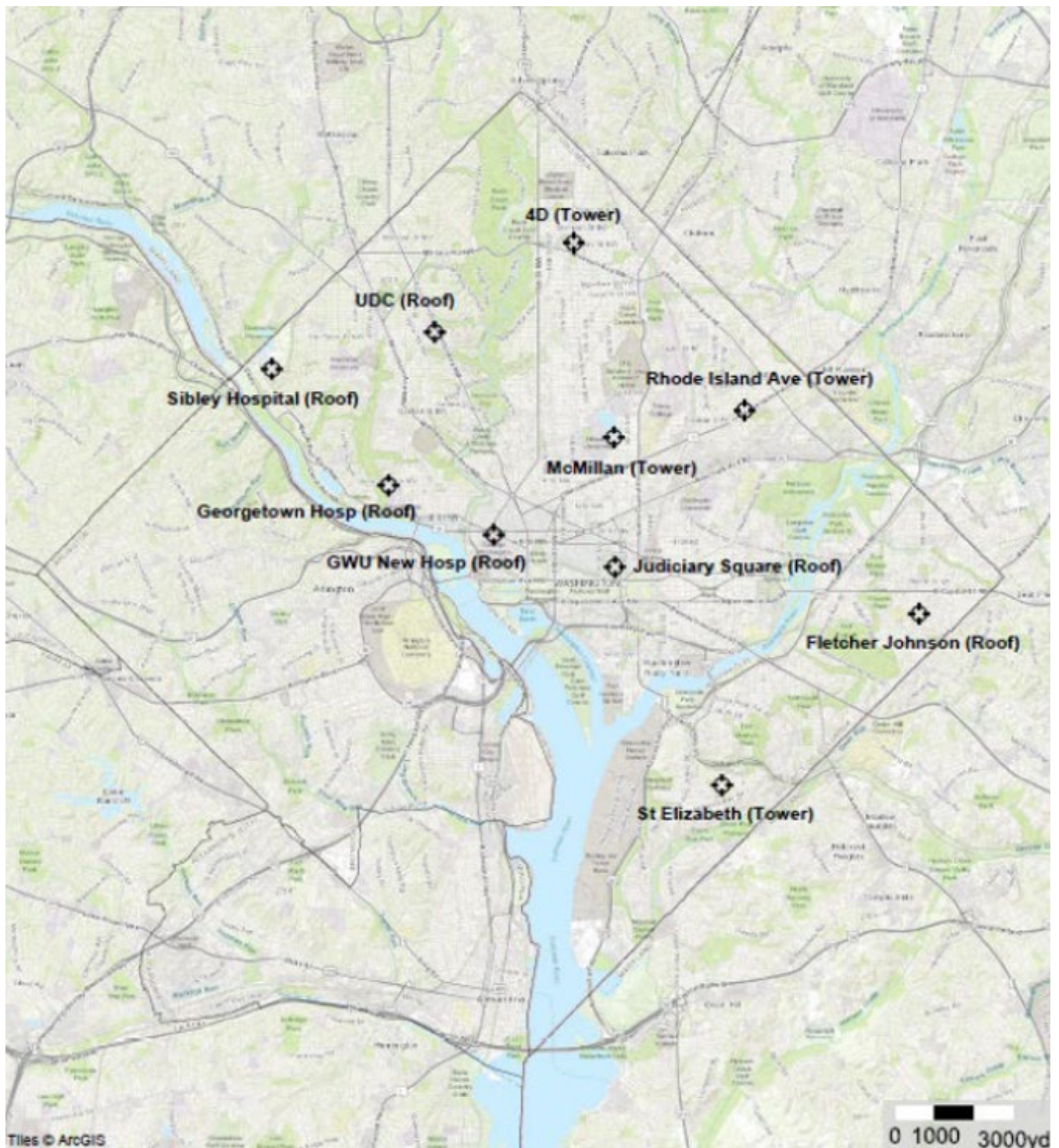
Pursuant to Subtitle C § 1305.2, building-mounted antennas extending above the top of the rooftop structure to which they are attached are permitted as special exceptions if approved by the Board after a public hearing, in accordance with Subtitle X § 901.2, provided the criteria of Subtitle C § 1312 are met. The Applicant submits the following preliminary supporting information pursuant to Subtitle C § 1312:

1. Subtitle C §1312.1(a)& (b)- A map of area to be served by the new antenna; and a map and explanation of the area being inadequately served that necessitates installation of the proposed antenna;

The transmitting and receiving antennas provide radio communications throughout the northwestern part of the District of Columbia. All facilities within the area are serviced by the antennas.

2. Subtitle C §1312.1(c)- A map indicating the location of any other antennas and related facility sites providing service by the applicant, and any antenna tower or monopole of any provider, within a two (2) mile radius, including public space, of the proposed antenna site, with identified heights above grade.

Following the placement of the antennas from its old location (building 41) to the Property, there are no immediate radio sites other than the OUC radio sites necessary to provide continuous radio communications per the drawing herein. As for the two-mile radius around the Property, DGS concedes that within that radius, there are antenna towers or monopoles of other providers, but DGS has no knowledge or information as to their existence or heights, other than that which visible from the street. DGS understands that neither the Office of Planning nor the Office of the Zoning Administrator maintains a list of antenna towers and monopoles and their locations in the District.



3. Subtitle C §1312.1(d)- *A site, and roof plan if applicable, showing all structures.*

Included with the application are a site and roof plan, which show the proposed antennas on the rooftop structure of the building.

4. Subtitle C §1312.1(e)- *Elevation drawings of the structure and proposed antennas from all four (4) directions.*

Included with the application are elevation drawings, which show the Applicant's proposed antennas.

5. Subtitle C §1312.1(f)- *A picture of the proposed antenna.*

Included with this application are drawings, representative photograph and installation hardware of the proposed antennas.

6. Subtitle C §1312.1(g)- *The total mounted height of the antenna relative to the tops of surrounding trees as they presently exist within one-quarter mile (.25 mi.) of the proposed location.*

This requirement is not applicable to the Property as it is surrounded by other campus buildings.

7. Subtitle C §1312.1(h)- *Other information as may be necessary for impact assessment of the antenna.*

The antennas must be located at the proposed heights above the rooftop structure in order to provide unobstructed reception and transmission capabilities for OUC's public safety communications in support of the District's emergency (911) and non-emergency (311) call center.

Based on the foregoing, the Applicant believes it has demonstrated that it meets the test for special exception approval under Subtitle C § 1305.