



## MEMORANDUM

**TO:** District of Columbia Board of Zoning Adjustment  
**FROM:** Karen Thomas, Case Manager  
JL Joel Lawson, Associate Director Development Review  
**DATE:** February 20, 2025

**SUBJECT:** BZA Case 21234 - Request for special exception relief pursuant to Subtitle C § 1305.2, Subtitle C § 1312, and Subtitle X § 901, for a special exception to locate antennas on a building at 4200 Connecticut Ave NW.

### I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the requested special exception to permit the relocation of antennas on the roof of a building at 4200 Connecticut Avenue NW, not meeting the requirements as follows:

- C § 1305.1 (a): **Required:** 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; **Proposed:** 6 antennas, including 4 panels and 2 Omni whip antennas approximately 20 feet above the mechanical screen wall to which it would be mounted. ([Exhibit 5](#))

### II. LOCATION AND SITE DESCRIPTION

Address:	4200 Connecticut Avenue NW
Applicant	District of Columbia General Services
Legal Description	Square 464, Lot 26
Ward / ANC	Ward 3/ ANC 3F
Zone	R-1B– Intended to permit low-density residential development;
Lot Characteristics	The lot is an irregular -shaped lot surrounded by streets at each property line.
Existing Development	The property is developed with the campus buildings of the University of the District of Columbia.
Adjacent Properties	The UDC Campus abuts four streets and the rear yards of embassy properties to the west fronting International Court. NW.
Surrounding Neighborhood Character	The neighborhood is a mix of residential, institutional and commercial buildings, including embassies and commercial uses along Connecticut Avenue.
Proposed Development	The Applicant, DCGS proposes to relocate six existing mounted antennas on Building 41 of the UDC campus to Building 38 as shown in Exhibit 5 to

	facilitate demolition of the current building (Bldg 41). At the proposed location the antennas are proposed to extend above the screen wall to which it would be mounted.
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### III. ZONING REQUIREMENTS and RELIEF REQUESTED

The Department of Building's Zoning Administrator by memo at [Exhibit 3](#) determined that the proposed antennas exceeded the maximum allowable height. Subtitle C § 1305.1(a) requires that building-mounted antennas do not extend above the structure to which it is mounted. Subtitle C § 1305.2 provides that such non-conforming antennas may be permitted through satisfaction of the special exception criteria of Subtitle C § 1312. The antennas total mounted height would measure approximately 20 feet above the top of the rooftop structure on Building 38, where the antennas would be relocated.

### IV. OP ANALYSIS – C § 1312

Section	Criteria	OP Response
<b>C§ 1312.1</b>		
(a)	<i>A map of area to be served by the new antenna;</i>	The proposed antennas would be relocated from Building 41 (Arts and Science Library) on the UDC Campus to Building 38 (School of Business and Public Administration) as the former would be demolished, and the antenna relocation is necessary to allow for the continued District emergency management. The Applicant provided a description of the service area of the antennas. “ <i>The UDC radio site is part of the radio system and provides radio coverage in the northwestern part of the District that includes foreign embassies, universities, including UDC, and area residents</i> ” ( <a href="#">Exhibit 7</a> ).
(b)	<i>A map and explanation of the area being inadequately served that necessitates installation of the proposed antenna</i>	
(c)	<i>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;</i>	The current antennas serve District-wide and the proposed location would continue to provide the necessary range required for the essential functioning of the antennas. A map is provided of the related sites for OUC,DC at <a href="#">Page 2 Exhibit 10</a> , and included at the end of this report for ease of reference.
(d)	<i>A site, and roof plan if applicable, showing all structures and antennas on site;</i>	The submission includes the site plan and roof plan showing the antennas’ proposed location. ( <a href="#">Exhibit 5</a> )
(e)	<i>Elevation drawings of the structure and proposed antennas from all four (4) directions;</i>	These are provided as Exhibit 4.
(f)	<i>A picture of the proposed antenna;</i>	The panel and whip antennas would not be substantially different from those depicted in the Antenna Sheet Detail of <a href="#">Exhibit 5</a> .

Section	Criteria	OP Response
(g)	<i>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; and</i>	There are no trees within the defined area that are the building's height or taller.
(h)	<i>Other information as may be necessary for impact assessment of the antenna.</i>	OP does not require additional information to assess the impact as viewed from public space.
<b>C§ 1312.2</b>	<i>the Board of Zoning Adjustment may impose conditions pertaining to screening, buffering, lighting, or other matter necessary to protect adjacent and nearby property</i>	OP does not suggest screening or other imposed conditions relative to the installation due to the building's height, and it is essentially screened by its location – at the back of the building off Connecticut Avenue, and blocked from view by a building fronting Connecticut Avenue.

## **Subtitle X § 901**

*901.2 The Board of Zoning Adjustment is authorized under § 8 of the Zoning Act, D.C. Official Code § 6-641.07(g)(2), to grant special exceptions, as provided in this title, where, in the judgment of the Board of Zoning Adjustment, the special exceptions:*

*(a) Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;*

The antennas would be in harmony with the intent and purpose of the Zoning Regulations, as they should not detract from the streetscape in the immediate neighborhood of primarily educational, commercial, and embassy structures. The view would not change appreciably from what currently exists due to the proposed projection above the screen walls, as the whips would be minimally visible from Connecticut Avenue, if at all. Therefore, the intent to minimize visibility from public space would be satisfied.

*(b) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and*

Antennas have always been accessory to the District's communications and operations center, including at its current location, to facilitate optimal emergency communication among the District's First Responders. The proposed antennas must be located at the proposed heights above the rooftop structure to provide optimal unobstructed reception and transmission to and from its operation center and to maintain effective communication functions.

The proposed installation should not adversely affect the use of surrounding neighboring property as it already exists within the neighborhood and complaints have not been received regarding its operation or visibility. All property in the immediate vicinity to the west is within the same zone district and are not in immediate view of residential uses. This deviation of the antennas height above the roofline should not adversely affect the use of the neighboring properties.

(c) Will meet such special conditions as may be specified in this title.

The application and installation would satisfy other conditions specified for building mounted antennas under C § 1305.

#### IV. COMMENTS OF OTHER DISTRICT AGENCIES

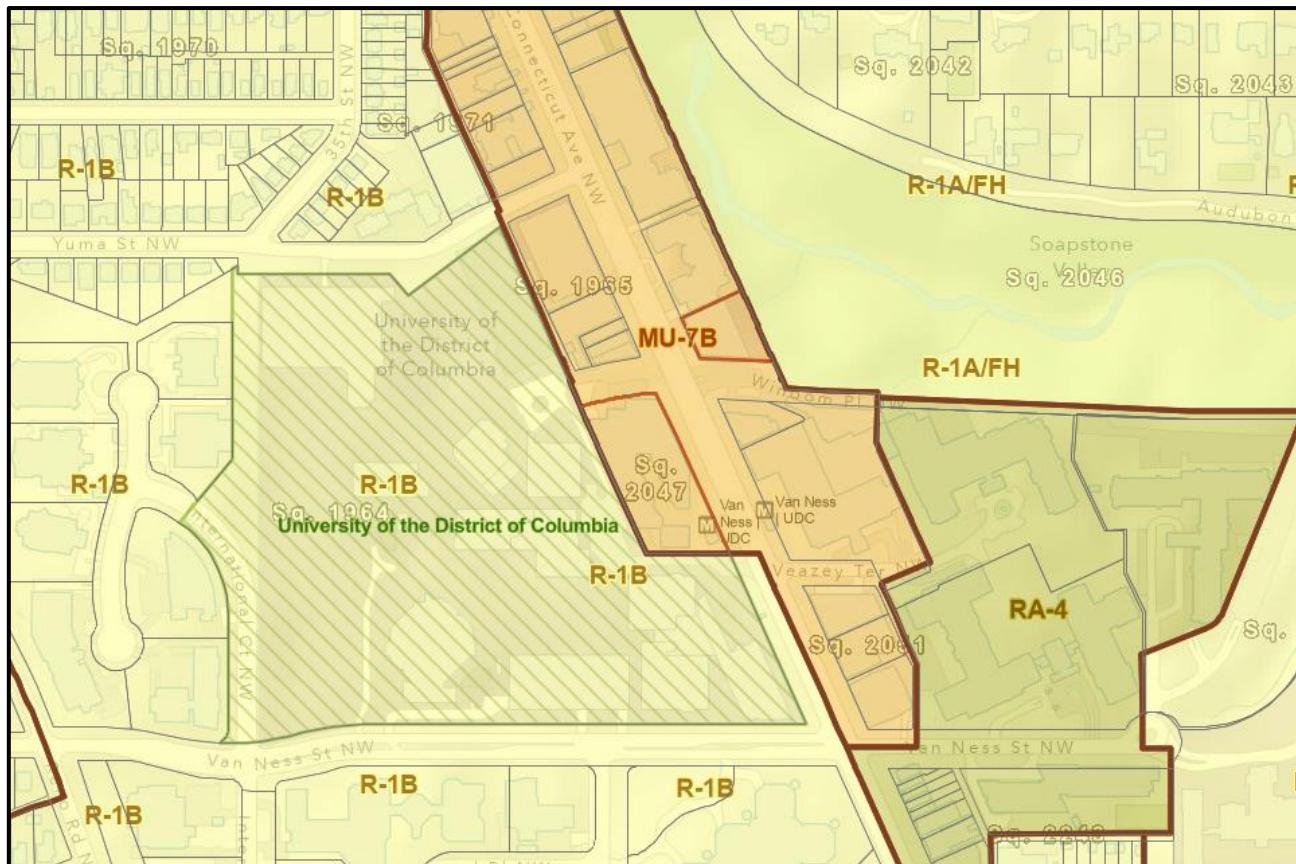
The report of the Office of Unified Communications is noted at [Exhibit 10](#).

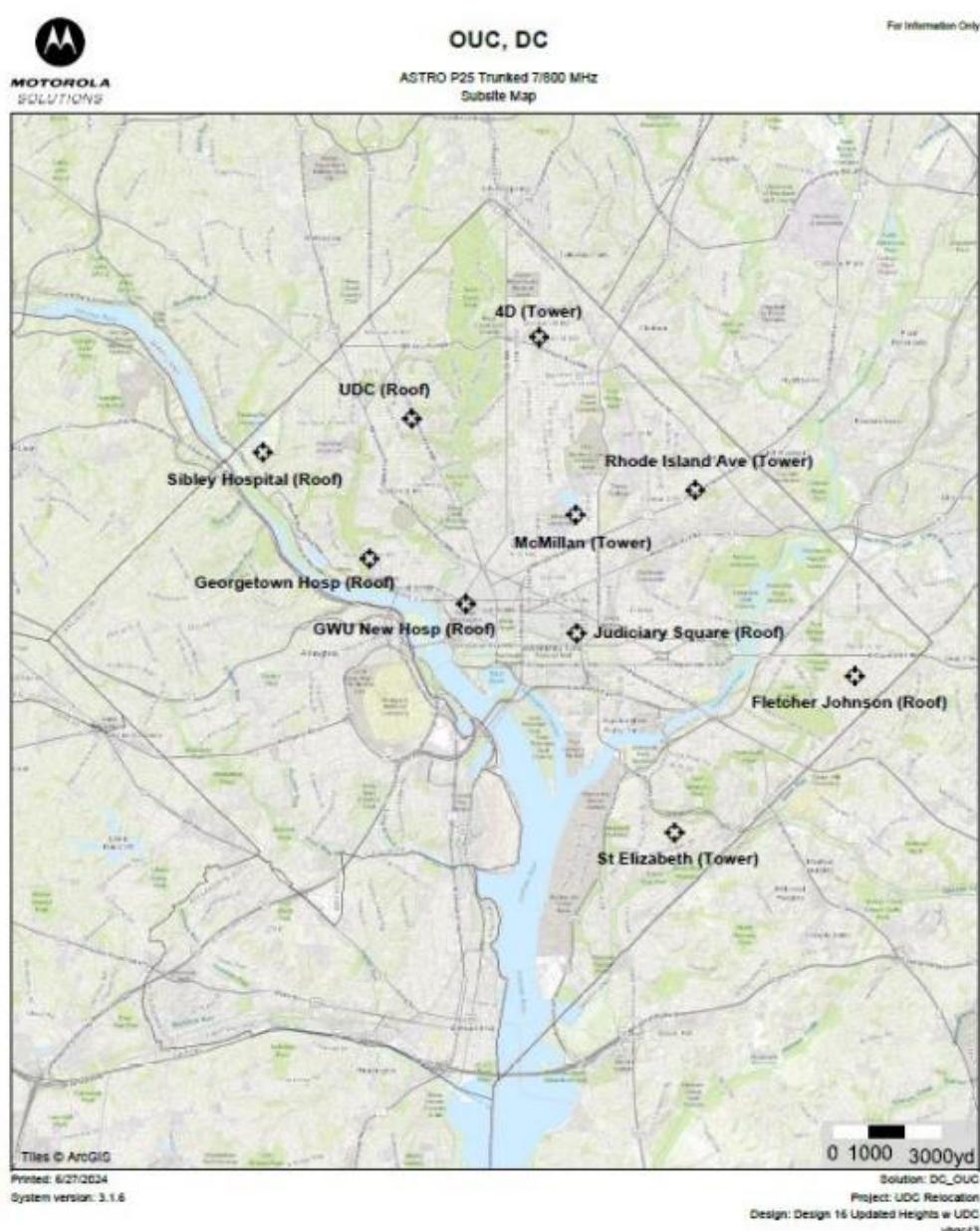
By email to OP on 2/14/2025, the District Department of Transportation (DDOT) noted it has no objection to approval of the application.

#### V. COMMUNITY COMMENTS

ANC 3F voted in support at its regularly scheduled meeting on November 19, 2024. [Exhibit 25E](#).

LOCATION MAP





**Map of Related OUC Sites**  
**Shown at Page 2 Exhibit 10**