

## MEMORANDUM

**TO:** District of Columbia Board of Zoning Adjustment  
**FROM:** Karen Thomas, Case Manager  
 JL Joel Lawson, Associate Director Development Review  
**DATE:** January 29, 2025

**SUBJECT:** BZA Case 21238: Special Exception request to install 31 roof-mounted antennas on the government building at 1015 Half Street SE (Square 697 Lot 045)

### **I. OFFICE OF PLANNING RECOMMENDATION**

The Office of Planning (OP) recommends **approval** of special exception relief for 31 proposed roof-mounted antennas at 1015 Half Street SE:

- Setback requirements pursuant to Subtitle C § 1304.1 (a), § 1304.2, § 1312.1 and Subtitle X, § 901.2 for 8 antennas (**min. setback required:** 25 feet; **Proposed** 5.45 feet to 12.47 feet)
- Height requirements pursuant to Subtitle C § 1302.1 (b), § 1304.2, § 1312.1 and Subtitle X § 901.2 for 26 antennas (**max permitted:** 12 feet; **Proposed:** 23 feet max.)
- 8 antennas require relief from both the setback and height requirements.

### **II. LOCATION AND SITE DESCRIPTION**

Address	1015 Half Street SE
Applicant	HGIT 1015 Half Street LLC
Legal Description	Square 5845 Lots 833
Ward / ANC	Ward 8; ANC 8F
Zone	D-5 – Intended to permit high-density commercial uses.
Lot Characteristics	The 45,658 sf L-shaped property is flat and abuts another similarly shaped property fronting South Capitol Street.
Existing Development	The property is developed with a nine-story commercial office building with DC Government agencies as main tenants.
Adjacent Properties	The adjacent properties are primarily office with some mixed-uses including residential/commercial uses among the squares within the D-5 zone.
Surrounding Character	The surrounding neighborhood is a mix of high density commercial and residential uses, hotels within the Ball Park/Navy Yard neighborhood.

Proposed Development	The Applicant on behalf of the District Government proposes an installation of antennas, including whips and dish antennas on the roof of the building at 1015 Half Street, which is occupied by District agencies. The proposed antennas require special exception relief from the setback requirement of Subtitle C § 1304.1(a) for eight (8) roof-mounted antennas and from the maximum mounted height requirement of Subtitle C § 1304.1(b) for twenty-five (26) roof-mounted antennas pursuant to Subtitle C § 1312.1. 8 antennas would require relief from both requirements. The proposed antennas are intended to modernize, and supplement existing communications equipment and capabilities of DC's HSEMA in support of homeland security and emergency preparedness.
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### III. OFFICE OF PLANNING ANALYSIS

The proposed installation of 31 antennas must meet the following requirements of C § 1304.1

1304.1 *All roof-mounted antennas, except those regulated by Subtitle C § 1306 or exempted by Subtitle C § 1307, shall comply with the following conditions:*

- (a) *Each part of an antenna shall be set back from each edge, excluding party walls, of the roof a minimum distance equal to its total mounted height above the roof;*  
Eight or more antennas would not meet the required setback from the roof's edge. The mounted antennas on the plans, labeled as 9 through 16 show setbacks ranging between 5.45 feet to 12.47 feet from the edge along the alley on the west of the building. ([Exhibit 10 - Plans and Elevations Sheet A10](#))
- (b) *An antenna may not exceed a total mounted height of twelve feet (12 ft.) above the roof;* Due to the nature of the antennas, the height together with the mounted height would exceed 12 feet above the roof, ranging between 13.78 feet to 22.58 feet ([Exhibit 10 Sheet A13](#)) With respect to the other requirements of C § 1304.1 (c) through (f), the installation would meet the criteria as stated in the Applicant's submission of [Exhibit 10, pages 3-5](#), including that:
- The antennas visibility from public space would be minimized due to the building's height at 110 feet, and the building's location on a narrow street with a limited viewshed.
  - The colors of the antennas would blend with the surroundings to the extent possible, typical of other mechanical equipment on rooftops.
  - There is no outdoor recreation space on the top of the roof structure, where antennas are proposed to be located; and
  - The proposed installations do not require related equipment cabinets or shelters, and none are proposed to be installed or relocated.

1304.2 *A proposed roof-mounted antenna that does not comply with the above requirements may be permitted through the special exception process set forth in Subtitle C § 1312.*

As stated, the antennas do not meet the above requirements, and the application must otherwise satisfy the following:

**Special Exception Relief pursuant to C § 1312.1 – Antennas Subject to BZA Approval**

**Special Conditions/Criteria**

Section	Criteria	OP Response
§1312.1	<i>An application for special exception approval shall include the following written and graphic documentation:</i>	
(a)	<i>A map of area to be served by the new <a href="#">antenna</a>;;</i>	In this case, the DC Homeland Security and Emergency Management Agency (HSEMA) has occupied this building since 2011, and the agency’s mission is to coordinate disaster support and broadcast communication among Federal and DC emergency management efforts throughout the DMV area, including the whole of the District. The new antennas would improve coverage and capacity for the District, as well as the area shown on the map at Exhibit 10 Sheet A4 – highlighting portions of the Southeast Navy Yard and Southwest neighborhood to the west of South Capitol Street.  There are five other antennas located on the same roof as the proposed antennas. Additional antennas in the vicinity of the Site are shown on the plans at <a href="#">Exhibit 10 Sheet A4</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>	
(d)	<i>A site, and roof plan if applicable, showing all structures and antennas on site;</i>	<a href="#">Exhibit 10, Sheet A7, A9 and A10</a>
(e)	<i>Elevation drawings of the structure and proposed antennas from all four (4) directions;</i>	<a href="#">Exhibit 10 Sheets 11,12,13,14</a>
(f)	<i>A picture of the proposed antennas</i>	<a href="#">Exhibit 10 Sheet A23</a>
(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 in the area above 110 feet, which is the height of the building. Therefore, the mounted heights would be greater than the existing trees in the area.
(h)	<i>Other information as necessary for impact assessment of the antenna</i>	None required

1312.2 *In addition to any other conditions deemed necessary to mitigate potential adverse impacts, the Board of Zoning Adjustment may impose conditions pertaining to screening, buffering, lighting, or other matter necessary to protect adjacent and*

*nearby property and may require the removal of any on-site non-conforming, inoperable, or unauthorized antenna.*

**Special Exception Review Standards: Subtitle X § 901**

**i. 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 installation, which is intended to provide uninterrupted coverage for security purposes of the District through DC HSEMA's management, would be in harmony with the intent and purpose of the Zoning Regulations. It would provide the necessary upgrades to improve the District's emergency response and security systems, particularly as there are limited opportunities for rooftop installation at desired elevations.

**ii. 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 through the special exception process. The proposed installation would be located within a government facility and should not affect residential uses in the neighborhood.

**IV. COMMENTS OF OTHER DISTRICT AGENCIES**

At the writing of this report, no other District agencies' reports had been added to the record.

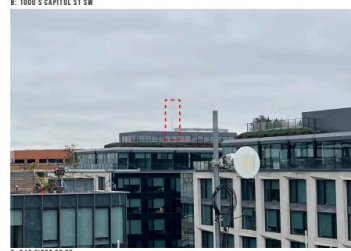
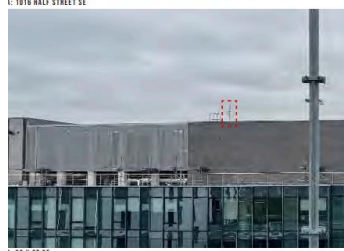
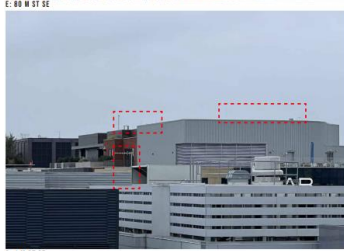
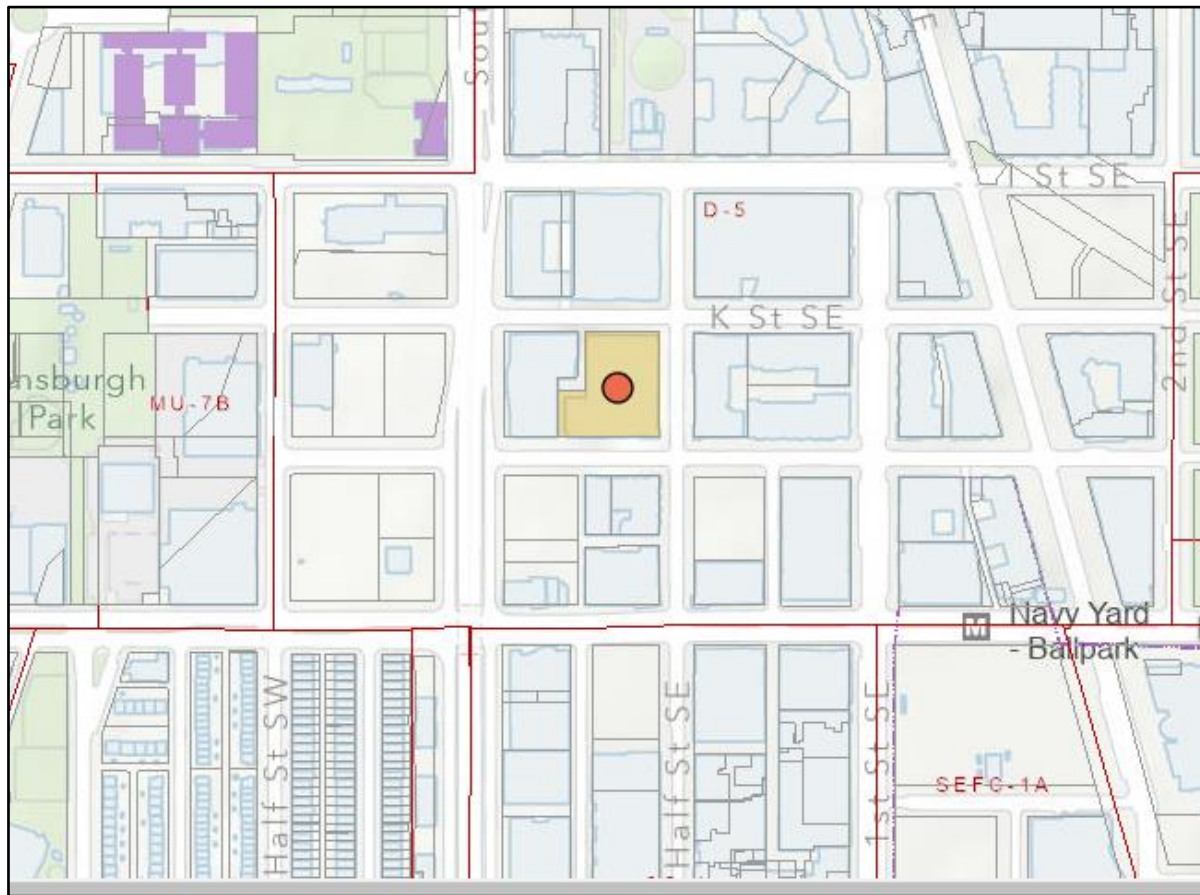
**V. ANC COMMENTS**

ANC 8F had not submitted a memo to the record as of the date of this report.

**VI. COMMUNITY COMMENTS**

At the writing of this report, there are no letters of support or opposition noted in the record.

**ZONING MAPS and VIEWS**



**Rooftop surrounding views (as provided by the Applicant - [Exhibit 10 Sheets A5 A6](#))**