

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
 Joel Lawson, Associate Director Development Review
DATE: June 11, 2025

SUBJECT: BZA Case 21284: Special Exception application of T-Mobile, pursuant to replace an existing light pole with a monopole at 3401 4th Street SE.

I. 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 a monopole at 120 feet in height:
 - Subject to the Applicant's provision of a Height Act Waiver by the Zoning Administrator, pursuant to C § 1313.7 at permitting.

II. LOCATION AND SITE DESCRIPTION

Address	3401 4th Street, SE
Applicant	T-Mobile
Legal Description	Parcel 0243/0059
Ward / ANC	Ward 8; ANC 8C
Zone	RA-1
Historic District	N/A
Lot Characteristics	The 715,059 square foot District-owned property is irregularly shaped, abutting 4 th Street SE along the east property line, 2 nd Street SE on its west property line, 20 th Street to the east, the rear yard of properties fronting Savannah Street SE. in the RA-2.
Existing Development	The property is developed with a Ballou High School, its athletic field, and accessory parking lot.
Adjacent Properties	Ballou High School occupies most of the parcel, while abutting the rear of row dwelling development and an apartment building to the north of the parcel, which is within the split-zoned Square 5978 Lot 1071(RF-1/RA-2). Those residences face Savannah Street SE and 4 th Street SE respectively.
Surrounding Neighborhood Character	The neighborhood is a mix of residential types in character with RF-1, R-2 and RA-1 zone development pattern.

Proposed Development	T-Mobile intends to install a monopole 120 feet in height. The new monopole would accommodate the relocation of existing antennas on the roof at 3720 Martin Luther King Jr. Avenue SE, which are currently not in operation due to vandalization. Relocation on the monopole would continue coverage in the neighborhood and allow for collocation of other carriers' antennas. The monopole is proposed to be located on the northern edge of the existing parking area on the eastern side of the property
----------------------	---

III. 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 proposed location is consistent with the purposes of the chapter, which are to allow necessary antenna facilities, while ensuring the safety of the population and minimizing their impact on the aesthetic interests of the District of Columbia (C-1300.1). The proposed pole would support the collocation of other service providers which would also support the District's Emergency Management System and is consistent with the District's policies. Due to the proposed location on the property, OP does not anticipate an adverse visual impact on residential neighborhoods to the north and west of the site.
(b)	<i>Designed and available for collocation by other service providers;</i>	The proposed monopole would be designed for collocation of up to two additional carriers above 50 feet.
(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, as it would be placed on the northern edge of the existing parking area located on the eastern side of the property. It would be visible from public space but would be located well within the school campus and approximately 135 feet from 4 th Street SE, and 391 feet from 2 nd Street SE.

Section	Criteria	OP Response
		<p>Its visibility from a section of 4th Street SE would be like that of the existing light poles on the field and the street light poles in public spaces. (See Exhibit 5.)</p> <p>The monopole would not be immediately visible from 2nd Street, Mississippi Avenue to the south of the campus, or MLK Avenue to the northwest of the campus.</p>
(d)	<p><i>Designed and constructed to preserve existing trees to the greatest practical extent.</i></p>	<p>The immediate area around the monopole is treeless. There are some trees on the periphery of the parking lot. However, one tree is proposed to be removed without removal of the number of parking spaces on the lot. The equipment area for the monopole would be fenced and screened from public access.</p>
§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><i>(a) There is a significant gap in wireless service;</i></p> <p><i>(b) The proposed <u>antenna tower</u> or <u>monopole</u> will fill this gap;</i></p> <p><i>(c) No other mounting options are available;</i></p> <p><i>(d) 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><i>(e) That the height and other physical design characteristics of the proposed antenna tower or monopole do not exceed those which are minimally necessary to fill the gap in wireless service;</i></p>	<p>The installation is able to satisfy the criteria, as follows:</p> <p>(a) There is currently a significant gap in wireless service as stated by the Applicant due to continual vandalization of the equipment on another property owned by DGS. The service is currently off-air.</p> <p>(b) The replacement pole would fill the gap as stated and shown on its coverage map.</p> <p>(c) The applicant has documented that no other collocation opportunities are available to fill this gap in service after examining options within a 2-mile radius. Existing buildings on the subject property and surrounding properties were not of sufficient height to satisfy coverage needs in this area.</p> <p>(d) At this location the pole would generate the least impact due to visibility since it would be among like structures, although taller to satisfy the coverage needs as outlined in the applicant's submission.</p> <p>(e) The pole is the minimum height needed to provide the required coverage and allow collocation of other providers in this section of the District. The applicant stated to OP that the waiver would be sought from the Zoning Administrator at permit review.</p>

Section	Criteria	OP Response
	<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 the Federal Communication Commission's cumulative and individual RF emission levels.</i></p>	<p>(f) The monopole as a replacement for the light pole would be less intrusive than a standard monopole fixture in the neighborhood. In past decisions it has been found acceptable at similar locations.</p> <p>(g) The pole will comply with all FCC requirements, per the applicant's statement of Exhibit 8, Page 59.</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 Applicant stated that the waiver will be provided at the hearing. OP notes that a permit would not be issued without the waiver from the Mayor's representative (Zoning Administrator) at the Department of Building.
§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>	The monopole is set back approximately 352 feet from the closest residential properties to the north facing Savannah Street SE, which is more than twice the height of the 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 monopole would conform to the setback requirements. It will be set back 391 feet from the west property line, 352 feet from the north property line, 135 feet from the east property line, and 1,251 feet from the south property line. These setbacks exceed the minimum 40 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 service by the applicant within a two (2)-mile radius, including public space, of the proposed site;</i></p>	<p>(a), (b) The existing and proposed coverage maps are submitted to the record as part of Exhibit 9. The applicant stated to OP that there are no existing structures within the area surrounding the proposed site that satisfy the carrier's coverage needs.</p> <p>(c), (d) (e) Other sites or towers within a two-mile radius were not provided at the writing of this report. The Applicant states that this would be provided at the hearing. OP notes that this radius is within the coverage range of the relocated antennas which were operational and were disabled due to persistent vandalism.</p>

Section	Criteria	OP Response
	<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><i>(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</i></p> <p><i>(l) Other information as may be necessary for impact assessment of the antenna tower or monopole.</i></p>	<p>(f) (g) In this case, the monopole would be owned and maintained by DGS and it is the District's policy to encourage collocation for more than one provider on a structure. This requirement would be met in this case.</p> <p>(h) A topographical map was not provided in the record to date. OP requested the Applicant provide this to the record.</p> <p>(i) At 120 feet, the proposed monopole and the existing light poles would be taller than the closest set of trees (approximately 40 feet) within the neighborhood.</p> <p>(j) The existing pole's exterior finish would be silver coating typical of wireless installations.</p> <p>(k) The unmanned equipment facility would be secured by fencing to prevent unwanted entry into the equipment compound. The Department of General Services (DGS) would be responsible for all equipment maintenance.</p> <p>(l) OP does not require additional information for impact assessment due to the pole's location within the compound.</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 monopole use for T-Mobile and other wireless provider uses would be in harmony with the intent and purpose of the Zoning Regulations. The structure would not be appreciably different in height from existing light poles, and it would provide collocation opportunities for up to two other carriers as desired by the regulations to reduce the need for other poles in the

community. Further, it would support improvement of emergency management service delivery for neighborhoods within the southeast quadrant of the District.

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 proposed monopole would be located closest to the field courts, and other recreational use and would not adversely affect residential uses.

IV. COMMENTS OF OTHER DISTRICT AGENCIES

The District Department of Transportation (DDOT) indicated to OP that it has “no objection to the approval of the application”.

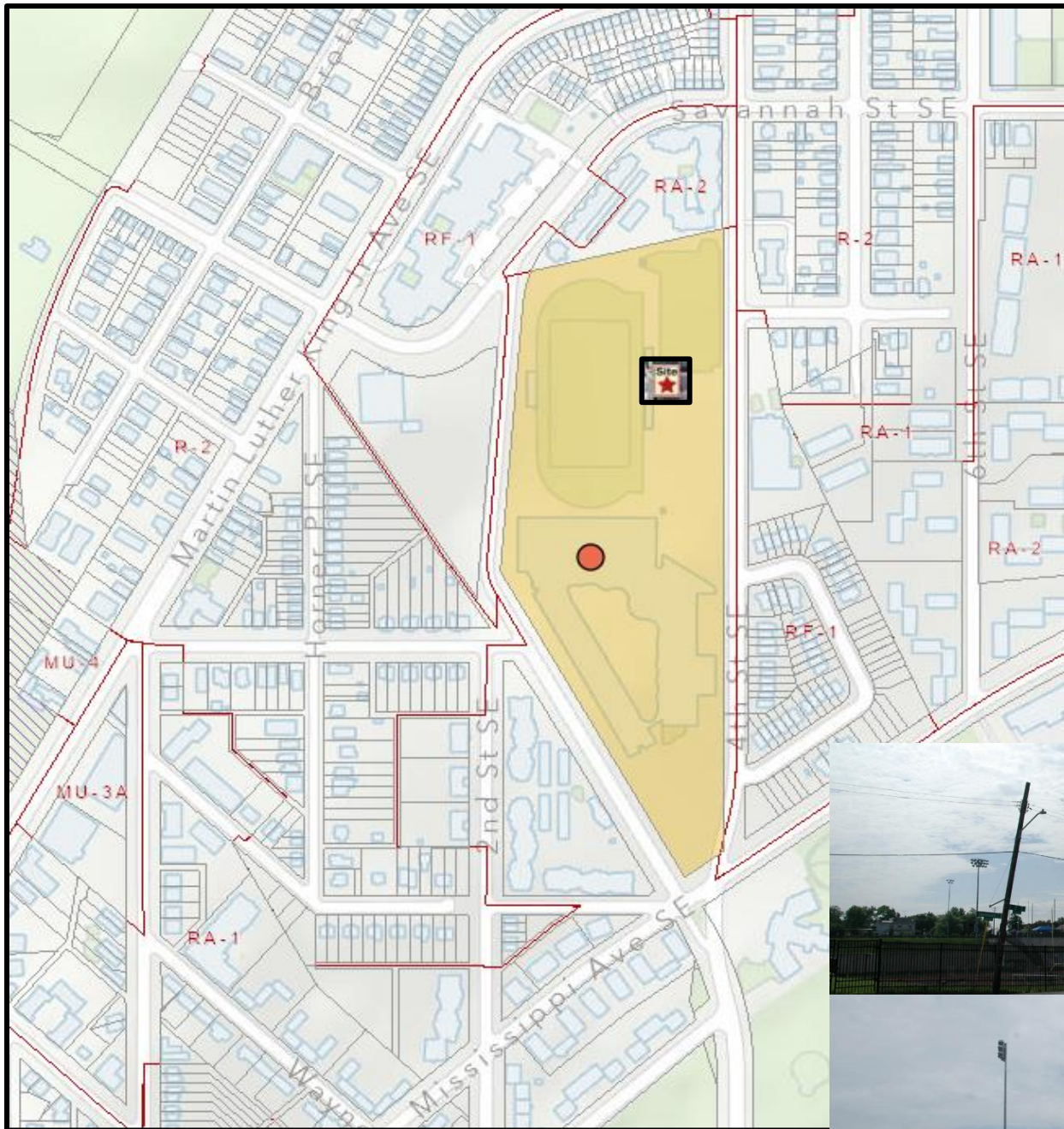
V. ANC COMMENTS

An ANC 8A report had not been provided to the record at the writing of this report.

VI. COMMUNITY COMMENTS

There were no comments from neighbors in the record at the writing of this report.

ZONING MAPS and VIEWS



**VIEWS
(Provided
by the
applicant)**

