



January 28, 2026

Meridith H. Moldenhauer

Direct Phone 202-747-0763
mmoldenhauer@cozen.com

Zachary R. Bradley

Direct Phone 202-280-6451
zbradley@cozen.com

Carl H. Blake,
Vice Chairperson
Board of Zoning Adjustment
441 4th Street NW, Suite 200s
Washington, DC 20010

**Re: BZA Appeal No. 21314
Intervenor D.C. Department of General Services' Supplemental Statement**

Chairperson Hill and Honorable Members of the Board:

On behalf of the Intervenor D.C. Department of General Services ("DGS"), agent for the owner of the property located at 1700 38th Street, NW (Square 1307, Lot 859), please find enclosed a Supplemental Statement as to the merits of the subject appeal. This appeal is scheduled to be heard by the Board on February 4, 2026.

Sincerely,

COZEN O'CONNOR

Meredith H. Moldenhauer

Zachary R. Bradley

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2026 a copy of the foregoing Supplemental Statement with attachments was served, via electronic mail, on the following:

District of Columbia Department of Buildings
Attention: Esther Yong McGraw, Esq., General Counsel
1100 4th Street SW, Ste. 5266
Washington, DC 20024
Esther.mcgraw2@dc.gov
Attorney for DOB

Michael McDuffie
3723 R Street NW
Washington, D.C. 20007
Micahel.mcduffie@gmail.com
Attorney for Appellant

Advisory Neighborhood Commission 2E
Gwendolyn Lohse, Chairperson
Kishan Putta, SMD 2E01
2E06@anc.dc.gov
2E01@anc.dc.gov
2E@anc.dc.gov

Burleith Citizens Association
2336 Wisconsin Avenue NW
PO Box 32262, Calvert Station
Washington, D.C. 20007
bca@burleith.org
Appellant



Zachary R. Bradley

**BEFORE THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

**APPEAL OF
BURLEITH CITIZENS ASSOCIATION**

**BZA CASE NO. 21314
HEARING DATE: FEBRUARY 4, 2025**

SUPPLEMENTAL STATEMENT OF THE DEPARTMENT OF GENERAL SERVICES

Intervenor District of Columbia Department of General Services (“DGS”) submits this Supplemental Statement to address the central premise underlying this appeal: whether freestanding light fixtures fall within the Zoning Regulations definition of “structure” such that dimensional zoning standards like setbacks apply. The contemporaneous record demonstrates that the answer to this question is unclear.

In light this ambiguity DGS submits that the Board’s analysis in this adjudicatory posture should be guided by four interrelated considerations. First, the Board should assess the reasonableness of the Zoning Administrator’s interpretation in light of longstanding administrative practice. Second, the Board should consider the practical and legal consequences of resolving this interpretive question through adjudication, including the sweeping, citywide effects that would follow from classifying light poles as “structures” subject to dimensional zoning standards. Third, the Board should evaluate the existing regulatory framework that already governs the siting and impacts of exterior lighting and how it works in conjunction with the Zoning Regulations . Finally, the Board should consider the public-policy implications of such a reclassification for the District’s ability to maintain and operate safe, accessible outdoor recreational facilities and the need to preserve regulatory continuity where the text is ambiguous and under active Commission review.

I. The ZA’s Interpretation is Reasonable given the Acknowledged Regulatory Ambiguity and Longstanding Administrative Practice

When the Zoning Commission itself considered how light poles should be treated under the Regulations, it acknowledged that the proposed text amendment was prompted by “*some confusion as to what ... the existing regulation might require,*” and “*that people don't know*

whether it's allowed by right or whether it has to have this one-to-one setback.” Zoning Comm’n Case No. 25-12, Tr. 101:21-102:13 (Nov. 25, 2025). As Vice Chair Miller explained, the perceived requirement of a one-to-one setback for a 90-foot light pole “*doesn’t make any sense*” and, paradoxically, “*would cause more light spillage than just a light going up adjacent to the recreational area,*” underscoring that the asserted zoning constraint was not only unclear, but potentially counterproductive. *Id.* Those remarks reflect an acknowledgment that the existing text does not clearly compel the application of dimensional zoning standards to light poles as the Appellant suggests.

In the face of that acknowledged ambiguity, the Zoning Administrator reasonably applied the Regulations in a manner consistent with how they have long been administered across the District. Light poles have historically not been treated as “structures” subject to dimensional zoning requirements. One self-certified application does not alter the interpretive weight of longstanding administrative practice. Here, excluding freestanding light poles from the definition of “structure” avoids importing rigid spatial requirements into a context where the Regulations do not clearly require them and, where, as Vice Chair Miller highlighted, doing so would produce counterintuitive and potentially unworkable results.

That reasonableness is further reinforced by the nature of the issues actually raised in this appeal. The concerns identified by Appellant do not relate to lighting impacts such as glare, light trespass, or illumination effects tied to the height, siting, or configuration of the proposed light poles. Instead, Appellant identifies “hours and days of operation, anticipated programming and permittees, crowd size, traffic, parking, and noise” as the key unresolved issues.¹ Appellant’s Reply, Ex. 11 at 2. None of those concerns turns on whether a light pole is subject to dimensional zoning standards, and none would be remedied by imposing setback requirements on lighting

¹ Use designation and parking requirements are not at issue in this appeal.

infrastructure. In these circumstances, the Zoning Administrator’s interpretation is reasonable because it preserved the status quo under which light poles have long been sited and regulated, while avoiding the imposition of a novel application of dimensional zoning standards that would neither address the objections repeatedly advanced by the Appellant nor be compelled by the text of the Regulations.

II. Upholding the Zoning Administrator’s Interpretation Promotes Administrability and Avoids Ad Hoc Interpretative Application

Light poles are ubiquitous throughout the District and appear in a wide range of contexts, including recreation facilities, hospitals, parking lots, shopping centers, and private developments. Any interpretation that treats all light poles as “structures,” subject to dimensional zoning requirements, would create immediate widespread nonconformity not limited to nonconformities resulting from failure to comply with Subtitle D § 203.5. Once classified as “structures,” light poles would be subject to the all yard regulations themselves. As a consequence of being deemed a “structure,” the presence of any light pole within any required yard would render a site nonconforming regardless of the pole’s height, luminary impact, or proximity to adjacent properties. Even if the Regulations could be read to encompass light poles within the definition of “structure,” the absence of any textual guidance for applying yard and setback standards to lighting infrastructure, combined with the sweeping nonconformity that would result, demonstrates that such a reading reflects an ad hoc expansion of the Regulations rather than well-reasoned interpretation of their intended operation.

This wave of newly identified nonconformities resulting from an interpretation declaring light poles to be “structures” subject to dimensional requirements would arise not from any change in physical conditions, but from a novel reclassification of existing infrastructure through adjudication. Numerous projects throughout the District like the recent McMillan PUD that included light poles, have been reviewed and approved by the Zoning Commission and the Board

without those light poles being independently reviewed or regulated as separate zoning features. This administrability problem is highlighted by Appellants' reliance on *Gonzaga* as a reference point. If freestanding light poles are treated as "structures," and the presence of a "structure" within a required yard is prohibited, *Gonzaga* would be required to demonstrate that its light poles are not located within required yards, or to seek zoning relief to the extent they are. The Office of Planning report did not evaluate yard compliance for light poles, underscoring at the very least that yard analysis has never been part of zoning review for lighting infrastructure. More broadly, the District, through DGS and DPR, routinely constructs and maintains recreational facilities and other public improvements without seeking zoning relief for the accompanying light poles, consistent with the longstanding understanding the ZA applied in this case that such infrastructure is not subject to dimensional zoning standards. The practical burden of addressing these suddenly nonconforming "structures" would fall disproportionately on the District, which owns and maintains a substantial share of the City's lighting fixtures. This result further demonstrates that Appellants' interpretation reflects an ad hoc expansion of the Regulations rather than a framework the Regulations were designed to support.

Where a potential interpretation produces results that even experienced zoning officials struggle to articulate in workable terms, that difficulty itself signals the need for a more nuanced regulatory approach. The Zoning Commission's ongoing deliberations on the treatment of light poles underscore precisely that point, applying dimensional zoning concepts, such as one-to-one setbacks, to freestanding light poles presents challenges that resist categorical resolutions. In these circumstances, affirming the Zoning Administrator's longstanding interpretation maintains the regulatory baseline under which light poles have been sited and administered throughout the District. The Zoning Commission's text-amendment process, by contrast, is designed to consider questions of classification and dimensional regulation on a prospective, citywide basis, including

whether and how existing conditions should be addressed and whether different standards are appropriate in different contexts. Maintaining the Zoning Administrator’s interpretation while that process proceeds, avoids introducing uncertainty for existing installations and ensures that any clarification is implemented through a comprehensive and coordinated framework.

III. Existing Construction Code Standards Govern the Siting and Impacts of Light Poles, Supporting Deference to the Zoning Administrator’s Interpretation

The Board should give the ZA’s interpretation persuasive weight as the zoning regulations are not the city’s regulating framework overseeing the siting and control of light fixtures, the construction code is. The impetus for this supplemental submission arises directly from the Zoning Commission’s discussion at its November 25, 2025 public hearing. In addressing the eventually withdrawn light-pole text amendment, Commissioners and testifying ANC’s raised questions about light spill, glare, neighborhood compatibility, and whether enforceable standards exist outside the zoning framework to address those concerns. Opposition to treating light poles as outside zoning dimensional controls was driven largely by concern that such an interpretation would leave glare, light trespass, and illumination impacts unregulated or inadequately enforced. Those concerns are understandable, but they are not accurate.

Section 409 of the District’s Green Construction Code, attached as Tab A, establishes mandatory, enforceable requirements for exterior lighting, including lighting zones based on neighborhood context, limits on glare measured at property lines, requirements for shielding and fixture orientation, and limits on color temperature. The Construction Code further provides tailored standards for athletic playing-area lighting, requiring full shielding, glare-control measures, and the elimination of uplight above the horizontal plane. *See* Tab A. These provisions have force of law, apply citywide, and are enforced through the building permit and inspection process. Declaring light poles as “structures” and subjecting them to dimensional zoning requirements would be redundant, layering rigid spatial constraints on top of the pre-existing

tailored controls that already govern glare, light trespass, orientation, and placement. In that sense, reclassifying light poles as structures would operate as a blunt instrument where a more calibrated regulatory approach is required, creating sweeping city-wide consequence that are poorly aligned with the underlying concerns in the process.

As explained in the Statement of Peter Nohrden, attached as Tab B, in addition to satisfying permitting requirements, DPR evaluates lighting for athletic field projects using internal District-wide lighting guidelines that inform how lighting is designed, specified, and controlled across DPR facilities. In this case, the lighting installed at Duke Ellington Field not only reflects DPR's application of those District-wide guidelines, but also meets the International DarkSky Association's Criteria for Community-Friendly Outdoor Sports Lighting. DPR has obtained a DarkSky compliance certificate confirming that the project satisfies those highest standards for outdoor recreational lighting based on objective and measurable performance criteria. See Tab B, Ex.1. Having satisfied the District's statutory requirements, DPR's District-wide lighting guidelines and the most stringent international standards applicable to athletic field lighting, the Board may deny this appeal with confidence that treating free standing light poles as not subject to dimensional zoning requirements is reasonable in light of the comprehensive regulatory and agency review already applied. That conclusion preserves a workable and consistent regulatory framework while leaving any broader policy questions regarding the classification of light poles to the Zoning Commissions text amendment process.

IV. Public Policy Favors Predictable, Coordinated Regulation of Public Facilities

Public policy supports affirming the Zoning Administrator's interpretation because the District must be able to plan, build, and operate public facilities under a predictable and coordinated regulatory framework. In a dense city with limited green space, safe and usable outdoor recreation depends on lighting. Athletic fields cannot function safely without it. The

Department of Parks and Recreation is charged with delivering those facilities and does so through a process that includes design review, technical standards, and sustained community engagement about programming, hours of use, and neighborhood compatibility. Zoning dimensional standards applied to light poles are not the mechanism through which those issues are addressed.

That division of responsibility matters. The District regulates exterior lighting through the Construction Code and the building permit process, while DPR and DGS plan and operate facilities based on consistent assumptions about how those rules apply and work in conjunction with the Zoning Regulations. For years, agencies have relied on a shared understanding that lighting infrastructure is not subject to dimensional zoning requirements. Reversing that understanding through adjudication would disrupt interagency coordination and introduce uncertainty into a system that depends on clarity and predictability to function.

This appeal illustrates why that matters. Appellant's concerns relate to use, scheduling, and activity at the field, not to lighting impacts or siting. Reclassifying light poles as zoning "structures" would not address those concerns. It would instead create new regulatory friction for public projects across the District, without improving safety, reducing impacts, or advancing the interests raised here. Public policy does not favor outcomes that complicate the delivery of public facilities while leaving the underlying issues untouched.

The Zoning Commission is already considering whether the Regulations should be clarified going forward. Until that process is complete, stability matters. Affirming the Zoning Administrator's interpretation preserves a workable status quo, respects reasonable reliance by District agencies, and allows the Commission to address broader policy questions through a transparent, legislative process rather than through a single appeal.

V. Witness List

Intervenor anticipates presenting testimony from Thennie Mack Freeman,² Director of the District of Columbia Department of Parks and Recreation, who will testify regarding DPR’s authority and policies governing the installation and operation of lighting at public athletic fields and Peter Nohrden, Capital Projects Architect at the District of Columbia Department of Parks and Recreation, who will testify regarding the technical aspects of the field lighting, including fixture design, photometric performance, glare control, and Dark Sky compliance.

VI. Conclusion

As Intervenor explained in its Initial Statement, the regulatory text relied upon by Appellant does not clearly compel the rigid interpretation advanced on appeal, and the Regulations reasonably bear alternative readings when considered in context and as part of the broader zoning scheme. The Zoning Commission’s subsequent consideration of this very issue has now confirmed that understanding, with Commissioners expressly acknowledging uncertainty and confusion regarding how the existing Regulations apply to freestanding light poles. In that posture, the District of Columbia Court of Appeals has made clear that interpretation does not turn on isolated words read in the abstract. Rather, “[t]he meaning—or ambiguity—of certain words or phrases may only become evident when placed in context,” and statutory interpretation “is a holistic endeavor” that considers “placement and purpose in the statutory scheme,” as well as “statutory context and structure, evident legislative purpose, and the potential consequences of adopting a given interpretation.” *Booz Allen Hamilton Inc. v. Office of Tax & Revenue*, 308 A.3d 1205, 1209–10 (D.C. 2024) (internal quotation marks omitted). Applying that framework here, the Board need not resolve, in the abstract, how lighting infrastructure should be classified across the District. Nor need it adopt an interpretation that would impose sweeping and counterintuitive consequences

² The Director wishes to make a brief statement but her availability maybe limited.

where the text does not clearly require that result. The Board’s task is more limited: to determine whether the Zoning Administrator’s interpretation represents a reasonable application of regulatory language that, as the Commission itself has recognized, is not free from doubt. That is the framework under which the Board’s decision will be reviewed. As the Court of Appeals has explained, “[a] court will not reverse the BZA’s decision unless its findings and conclusions are arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; in excess of its jurisdiction or authority; or unsupported by substantial evidence in the record of the proceedings.” *Neighbors for Responsive Government, LLC v. District of Columbia Board of Zoning Adjustment*, 195 A.3d 35 (D.C. 2018). The Board therefore need not conclude that the Zoning Administrator’s interpretation is the only possible reading of the regulations, or even the one it would adopt in the first instance. It need only determine that the interpretation applied here is reasonable and supported by the record.

The record readily supports that conclusion. The Zoning Administrator’s interpretation reflects longstanding and workable administrative practice. Accordingly, the Board may appropriately affirm the Zoning Administrator’s determination, maintaining consistency in the administration of the Zoning Regulations while allowing the Zoning Commission to address any broader policy questions through the legislative process.

Sincerely,
COZEN O’CONNOR



Meredith H. Moldenhauer



Zachary R. Bradley

Tab A

not less than two spaces, shall be designated as preferred parking for low emission, hybrid, and *electric vehicles*.

SECTION 408 HEAT ISLAND MITIGATION

408.1 General. The heat island effect of building and building site development shall be mitigated in accordance with Sections 408.2.

408.2 Site hardscape. In climate zones 1 through 6, as established in the *Energy Conservation Code*, not less than 50 percent of the site hardscape shall be provided with one or any combination of options described in Sections 408.2.1 through 408.2.4. For the purposes of this section, site hardscape shall not include areas of the site covered by solar photovoltaic arrays or solar thermal collectors.

408.2.1 Site hardscape materials. Hardscape materials shall have an initial solar reflectance value of not less than 0.30 in accordance with ASTM E1918 or ASTM C1549.

Exception: The following materials shall be deemed to comply with this section and need not be tested:

1. Pervious and permeable concrete pavements.
2. Concrete paving without added color or stain.

408.2.2 Shading by structures. Where shading is provided by a building or structure or a building element or component, such building, structure, component or element shall comply with all of the following:

1. Where open trellis-type, free-standing structures such as, but not limited to, covered walkways, and trellises or pergolas, are covered with native plantings, the plantings shall be designed to achieve mature coverage within 5 years; and
2. Shade provided onto the hardscape by an adjacent building or structure located on the same lot shall be calculated and credited toward compliance with this section based on the projected peak sun angle on the summer solstice.

408.2.3 Shading by trees. Where shading is provided by trees, such trees shall be selected and placed in accordance with all of the following:

1. Trees selected shall be those that are native or adaptive to, the region and climate zone in which the project site is located. *Invasive plant species* shall not be selected. Plantings shall be selected and sited to produce a hardy and drought resistant vegetated area;
2. Construction documents shall be submitted that show the planting location and anticipated ten year canopy growth of trees and that show the contributions of existing tree canopies; and
3. Shading calculations shall be shown on the construction documents demonstrating compliance with this section and shall include only those hardscape areas directly beneath the trees based on a ten year growth canopy. Duplicate shading credit shall not be

granted for those areas where multiple trees shade the same hardscape.

408.2.4 Pervious and permeable pavement. Pervious and permeable pavements including open grid paving systems and open-graded aggregate systems shall have a percolation rate not less than 2 gallons per minute per square foot (100 L/min × m²). Pervious and permeable pavement shall be permitted where the use of these types of hardscapes does not interfere with fire and emergency apparatus or vehicle or personnel access and egress, utilities, or telecommunications lines. Aggregate used shall be of uniform size.

408.3 [Reserved]

SECTION 409 SITE LIGHTING

409.1 Light pollution control. Uplight, light trespass, glare, and color temperature shall be limited for all exterior lighting equipment as described in Sections 409.2, 409.3, and 409.4. The provisions of this section shall only apply to new construction and Level 3 *alterations* complying with the applicable requirements of the *Existing Building Code*.

Exceptions: Lighting used for the following exterior applications is exempt where equipped with a control device independent of the control of the non-exempt lighting:

1. Specialized signal, directional signage, and marker lighting associated with transportation or premises way-finding.
2. Signage that complies with lighting requirements set forth in regulations adopted pursuant to the *Sign Legislation*.
3. Lighting integral to equipment or instrumentation and installed by its manufacturer.
4. Theatrical purposes, including performance, stage, film production, and video production.
5. Athletic playing areas where lighting is equipped with hoods or louvers for glare control, provided that they are fully shielded and emit no light above the horizontal plane of the hood.
6. Temporary lighting.
7. Lighting for industrial production, material handling, transportation sites, and associated storage areas where lighting is equipped with hoods or louvers for glare control, provided that they are fully shielded and emit no light above the horizontal plane of the hood.
8. Theme elements in theme and amusement parks.
9. Roadway lighting required by governmental authorities.
10. Lighting used to highlight features of public monuments and registered landmark structures.
11. Lighting classified for and used in hazardous areas.

12. Lighting for swimming pools and water features.
13. Lighting for the national flag in lighting zones 2, 3 and 4.
14. Required exit signs and exterior means of egress illumination.

409.1.1 Exterior lighting zones. The lighting zone for the building site shall be determined from Table 409.1.1 as clarified by *Administrative Bulletins*.

**[E] TABLE 409.1.1
EXTERIOR LIGHTING ZONES**

LIGHTING ZONE	DESCRIPTION
1	Developed areas of national parks, state parks, forest land and rural areas
2	Areas predominantly consisting of residential zoning, neighborhood business districts, light industrial with limited nighttime use and residential mixed use areas
3	All other areas (not included in other zones)
4	High-activity commercial districts

409.2 Uplight. Exterior lighting shall comply with the requirements of Table 409.2 for the exterior lighting zones (LZ) appropriate to the *building site*.

Exception: Lighting used for the following exterior applications shall be exempt from the requirements of Table 409.2.

1. Lighting for *building* façades, landscape features, and public monuments in exterior lighting zones 3 and 4.
2. Lighting for *building* façades in exterior lighting zone 2.
3. Lighting installed below canopies.
4. Lighting for flag poles.

**TABLE 409.2
UPLIGHT RATINGS^{a, b}**

	LIGHTING ZONE (LZ)			
	1	2	3	4
Maximum luminaire uplight rating	U0	U1	U2	U3

- a. Uplight ratings (U) are defined by IESNA TM-15-07 Addendum A.
- b. The rating shall be determined by the actual photometric geometry in the specified mounting orientation.

409.3 Light trespass and glare. Where luminaires are mounted on buildings with their backlight oriented towards the building, such luminaires shall not exceed the applicable glare ratings specified in Table 409.3(1). Other exterior lumi-

naires shall not exceed the applicable backlight and glare ratings specified in Table 409.3(2).

**Table 409.3(1)
MAXIMUM GLARE RATINGS FOR BUILDING MOUNTED LUMINAIRES WITH THE BACKLIGHT ORIENTED TOWARDS THE BUILDING^{a, b}**

HORIZONTAL DISTANCE TO LIGHTING BOUNDARY (H_{LB})	LIGHTING ZONE (LZ)			
	1	2	3	4
$H_{LB} > 2 h_m$	G1	G2	G3	G4
$h_m < H_{LB} \leq 2 h_m$	G0	G1	G1	G2
$0.5 h_m \leq H_{LB} \leq h_m$	G0	G0	G1	G1
$H_{LB} < 0.5 h_m$	G0	G0	G0	G1

h_m = Mounting height: The distance above finished grade at which a luminaire is mounted, measured to the midpoint of the luminaire.

- a. Glare (G) ratings are defined by IESNA TM-15-07 Addendum A.
- b. The rating shall be determined by the actual photometric geometry in the specified mounting orientation.

**Table 409.3(2)
MAXIMUM ALLOWABLE BACKLIGHT AND GLARE RATINGS^{a, b, c}**

HORIZONTAL DISTANCE TO LIGHTING BOUNDARY (H_{LB})	LIGHTING ZONE (LZ)			
	1	2	3	4
$H_{LB} > 2 h_m$	B3 G1	B4 G2	B5 G3	B5 G4
$h_m < H_{LB} \leq 2 h_m$	B2 G1	B3 G2	B4 G3	B4 G4
$0.5 h_m \leq H_{LB} \leq h_m$	B1 G1	B2 G2	B3 G3	B3 G4
$H_{LB} < 0.5 h_m$	B0 G1	B0 G2	B1 G3	B2 G4

h_m = Mounting height: The distance above finished grade at which a luminaire is mounted, measured to the midpoint of the luminaire.

- a. Backlight (B) and glare (G) ratings are defined by IESNA TM-15-07 Addendum A.
- b. Luminaires located two mounting heights or less from the *lighting boundary* shall be installed with backlight towards the nearest *lighting boundary*, unless lighting a roadway, bikeway or walkway that intersects a public roadway.
- c. The rating shall be determined by the actual photometric geometry in the specified mounting orientation.

409.4 Color temperature. Maximum color temperature for lights complying with Section 409 shall be 3000 degrees Kelvin or lower.

Tab B

January 28, 2026

Carl H. Blake
Vice Chairperson
Board of Zoning Adjustment
441 4th Street NW, Suite 200s
Washington, D.C.

**Re: BZA Case No. 21314- BCA Appeal
Statement of Peter Nohrden**

Vice Chairperson Blake and Honorable Members of the Board:

My name is Peter Nohrden, my job title is landscape architect and I am also a project manager for the Capital Projects Division with the District of Columbia Department of Parks and Recreation (“DPR”). I oversee the planning and delivery of athletic field and park improvement projects and am part of the team responsible for ensuring that those projects meet DPR’s technical, safety, and community-compatibility standards. I want to briefly explain the framework that informs DPR’s lighting decisions, how those standards were applied here, and why DPR is confident that the lighting meets both playability and neighborhood-impact considerations.

DPR does not approach lighting decisions on an ad hoc or discretionary basis. Instead, we comply permitting requirements and rely on established internal lighting guidelines and industry best practices to ensure consistency across projects. In addition to permitting requirement these guidelines incorporate principles from the Illuminating Engineering Society (“IES”) and International DarkSky Association (“IDA”) and focus on managing light in a way that is purposeful, targeted, and controlled.

For new athletic fields in particular, DPR follows IDA’s *Criteria for Community-Friendly Outdoor Sports Lighting*. That framework evaluates lighting based on measurable performance standards. Core considerations include the reduction of backlight, uplight, and glare; minimizing light trespass beyond the project site; selecting appropriate color temperatures; incorporating shielding; orienting fixtures to limit off-site impacts; and using automatic control systems, including pre-programmed timers, that automatically dim lighting or shut it off entirely when facilities are not in active use. The lighting installed at Ellington Athletic Field meets IDA’s highest standards for outdoor sports lighting, and DPR has obtained DarkSky certification confirming that compliance.(attached as Ex. 1).

DPR manages a large and diverse portfolio of recreational facilities throughout the District, many of which were constructed decades ago and predate the development of the IDA’s

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certification and the widespread use of modern lighting controls. As a result, not all existing DPR facilities were designed to meet those criteria or to pursue DarkSky certification. For newer projects, particularly those located in close proximity to residential uses, DPR has made compliance with IDA's criteria a priority as part of its evolving commitment to responsible and community-informed development.

Pole height and fixture design are important components to overall lighting performance and impact. Lower poles do not necessarily result in reduced light pollution or fewer off-site impacts. In many cases, lower mounting heights require fixtures to be aimed at shallower angles, which can increase glare to surrounding areas and create uneven illumination on the field, resulting in brighter hotspots and reduced visibility for players. Taller poles, when paired with properly aimed, fully shielded fixtures, allow light to be directed more precisely and uniformly onto the playing surface, while meeting activity specific playability standards and minimizing lighting impact beyond the field. DPR's lighting guidelines reflect this balance between community impact and safe, functional play, and those principles were applied in the design of this project.

DPR also relies on photometric studies to evaluate lighting performance before installation. Those studies model light levels and spill to ensure compliance with applicable standards, and they inform fixture selection, aiming, and control strategies. A photometric study was prepared for this project. (attached as Ex. 2).

Finally, I want to emphasize that athletic field lighting is a standard component of DPR field projects citywide. DPR applies the same framework, guidelines, and technical criteria across projects to ensure predictable, safe, and community-compatible outcomes. Where neighbors raise concerns, DPR remains willing to consider additional mitigation measures, such as landscaping or operational controls, consistent with those standards and the city's policy goals for access and service to residents.

In sum, the lighting at Ellington Athletic Field reflects DPR's established approach to outdoor lighting: applying recognized technical standards, minimizing off-site impacts, and ensuring that public recreational facilities can be used safely and responsibly.

Sincerely,

Signed by:
Peter Nohrden
1954EB063770417...
Peter Nohrden

1/28/2026

Date

Exhibit 1



DarkSky

Issued: 2025-11.07
ID#: DS-OSL-35

DarkSky Approved Outdoor Sports Lighting Program Duke Ellington Track and Field

DarkSky installation certifications are given only after the field inspection has demonstrated full compliance with the lighting criteria described in the DarkSky Approved Outdoor Sports Lighting Program version 1.3 guidelines. The successful field inspection was performed on November 4th, 2025.

Thank you for your part in the world-wide effort to protect and preserve the natural nighttime environment and our heritage of dark skies.

James Brigagliano
Lighting Program Manager



DarkSky Approved
Outdoor Sports Lighting
CERTIFIED BY DARKSKY.ORG

Ruskin K. Hartley
DarkSky Executive Director

Exhibit 2

Lighting System

Pole/Fixture Summary						
Pole ID	Pole Height	Mtg Height	Fixture Qty	Luminaire Type	Load	Circuit
S1-S2	80'	80'	3	TLC-LED-1200	3.51 kW	A
		80'	3	TLC-LED-900	2.64 kW	A
S3	90'	90'	7	TLC-LED-900	6.16 kW	A
S4	80'	80'	7	TLC-LED-900	6.16 kW	A
4			26		24.62 kW	

Circuit Summary			
Circuit	Description	Load	Fixture Qty
A	Soccer	24.62 kW	26

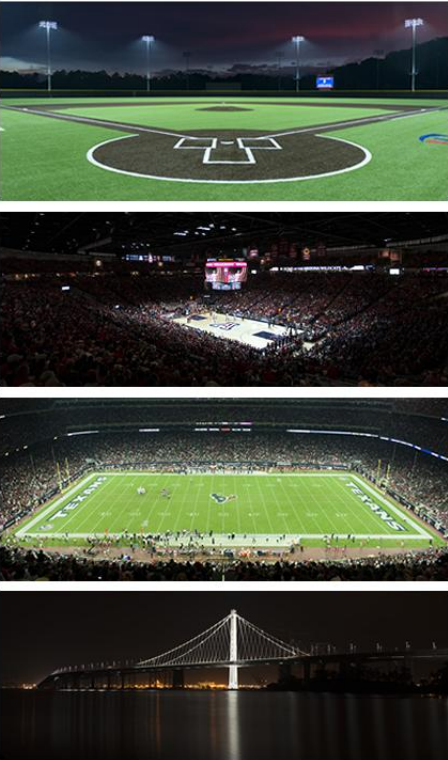
Fixture Type Summary							
Type	Source	Wattage	Lumens	L90	L80	L70	Quantity
TLC-LED-1200	LED 4000K - 70 CRI	1170W	150,000	>120,000	>120,000	>120,000	6
TLC-LED-900	LED 4000K - 70 CRI	880W	104,000	>120,000	>120,000	>120,000	15
TLC-LED-900	LED 5700K - 75 CRI	880W	104,000	>120,000	>120,000	>120,000	5

Single Luminaire Amperage Draw Chart								
Driver Specifications (.90 min power factor)	Line Amperage Per Luminaire (max draw)							
	208	220	240	277	347	380	480	
Single Phase Voltage	(60)	(60)	(60)	(60)	(60)	(60)	(60)	
TLC-LED-1200	6.9	6.5	6.0	5.2	4.2	3.8	3.0	
TLC-LED-900	5.2	4.9	4.5	3.9	3.1	2.9	2.3	

Light Level Summary

Calculation Grid Summary									
Grid Name	Calculation Metric	Illumination					Circuits	Fixture Qty	
		Ave	Min	Max	Max/Min	Ave/Min			
150' Spill	Horizontal Illuminance	0.0004	0.00	0.01	-	-	A	26	
150' Spill	Max Vertical Illuminance Metric	0.0013	0.00	0.02	-	-	A	26	
150' Spill (Cd)	Max Candela (by Fixture)	64.8063	0.00	747.30	-	-	A	26	
Building Spill Line	Horizontal Illuminance	0.0008	0.00	0.01	-	-	A	26	
Building Spill Line	Max Vertical Illuminance Metric	0.0018	0.00	0.02	-	-	A	26	
Building Spill Line (Cd)	Max Candela Metric	89.0826	0.00	788.49	-	-	A	26	
Property Spill Line	Horizontal Illuminance	0.0457	0.00	0.26	-	-	A	26	
Property Spill Line	Max Vertical Illuminance Metric	0.0769	0.00	0.42	-	-	A	26	
Property Spill Line (Cd)	Max Candela Metric	1370.3743	0.00	6947.83	-	-	A	26	
Soccer	Horizontal Illuminance	34.26	20	43	2.16	1.72	A	26	
Track	Horizontal Illuminance	10.44	0	31	65.79	22.37	A	26	

From Hometown to Professional



Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4				Totals		26	26	0

*Above Grade level relative to the field

Grid Summary	
Name	Soccer
Size	300' x 150'
Spacing	30.0' x 30.0'
Height	3.0' above grade

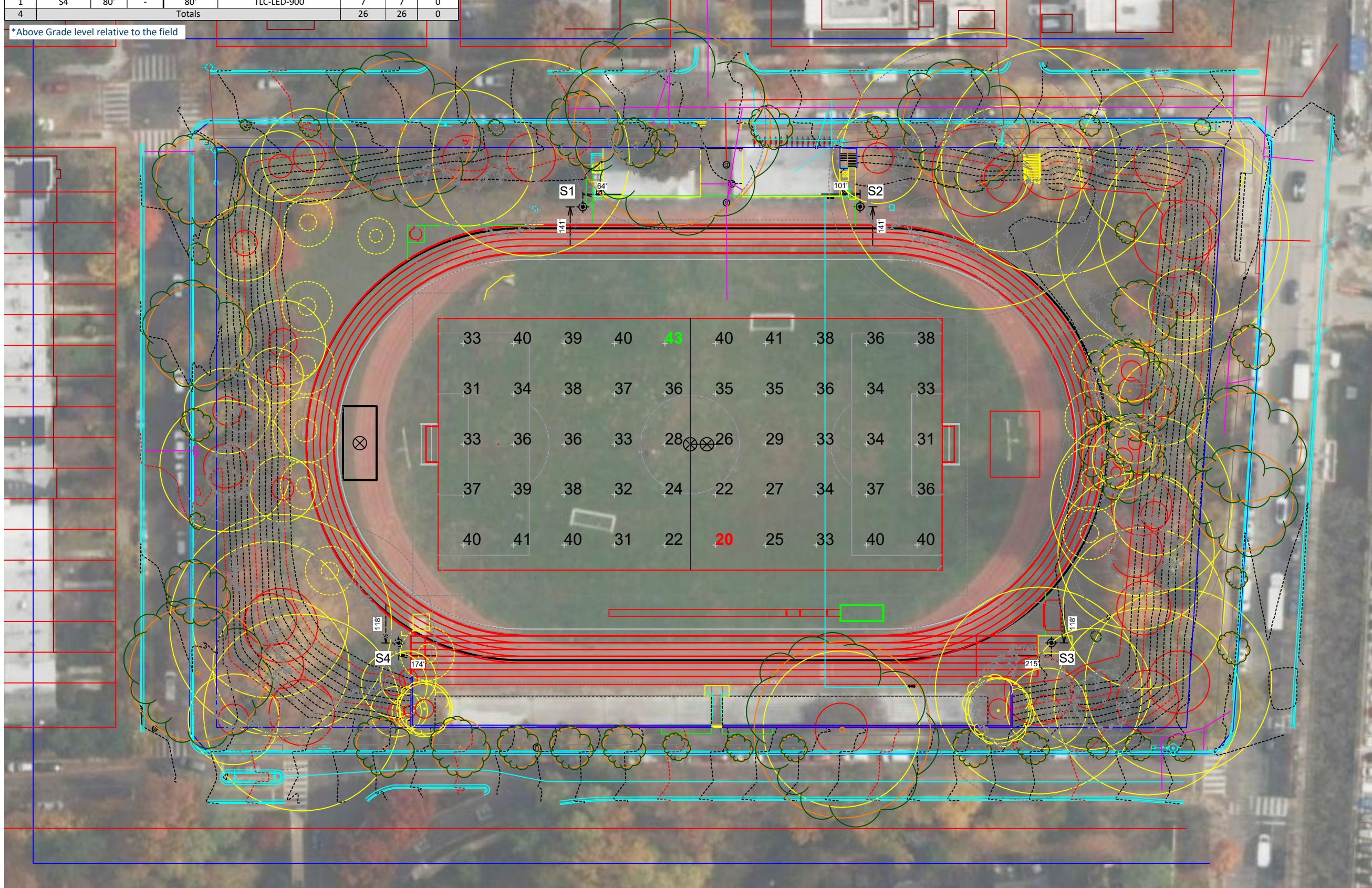
Illumination Summary	
MAINTAINED HORIZONTAL FOOTCANDLES	
	Entire Grid
Guaranteed Average	30
Scan Average	34.26
Maximum	43
Minimum	20
Avg/Min	1.72
Guaranteed Max/Min	2
Max/Min	2.16
UG (adjacent pts)	1.37
CU	0.52
No. of Points	50
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

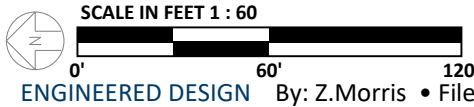
Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



33	40	39	40	43	40	41	38	36	38
31	34	38	37	36	35	35	36	34	33
33	36	36	33	28	26	29	33	34	31
37	39	38	32	24	22	27	34	37	36
40	41	40	31	22	20	25	33	40	40



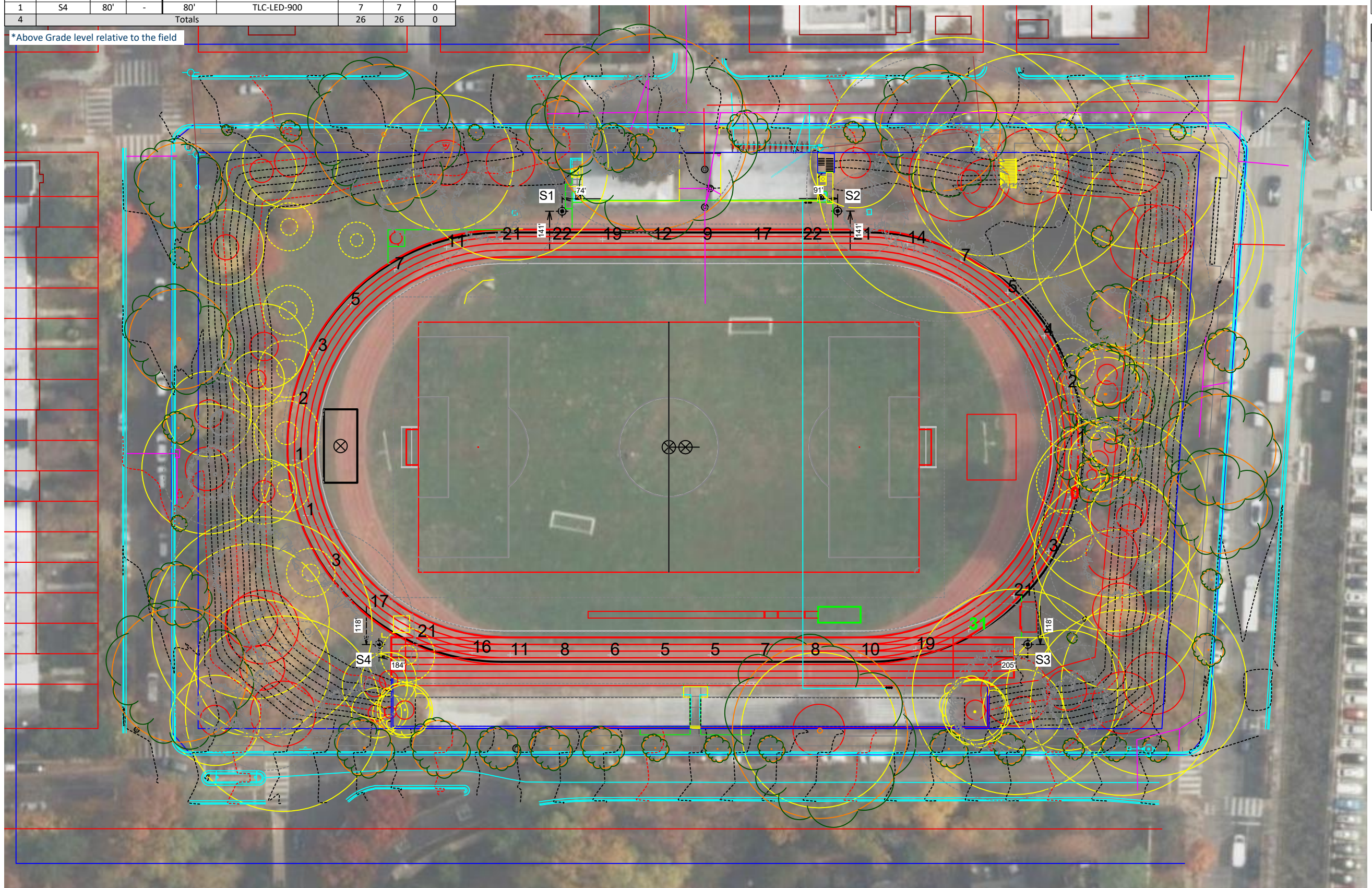
Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85.0'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4				Totals		26	26	0

*Above Grade level relative to the field



Grid Summary	
Name	Track
Size	Irregular
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary	
MAINTAINED HORIZONTAL FOOTCANDLES	
Scan Average	10.44
Maximum	31
Minimum	0
Avg/Min	22.37
Max/Min	65.79
UG (adjacent pts)	0.00
CU	0.12
No. of Points	38
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

SCALE IN FEET 1 : 60
 0' 60' 120'
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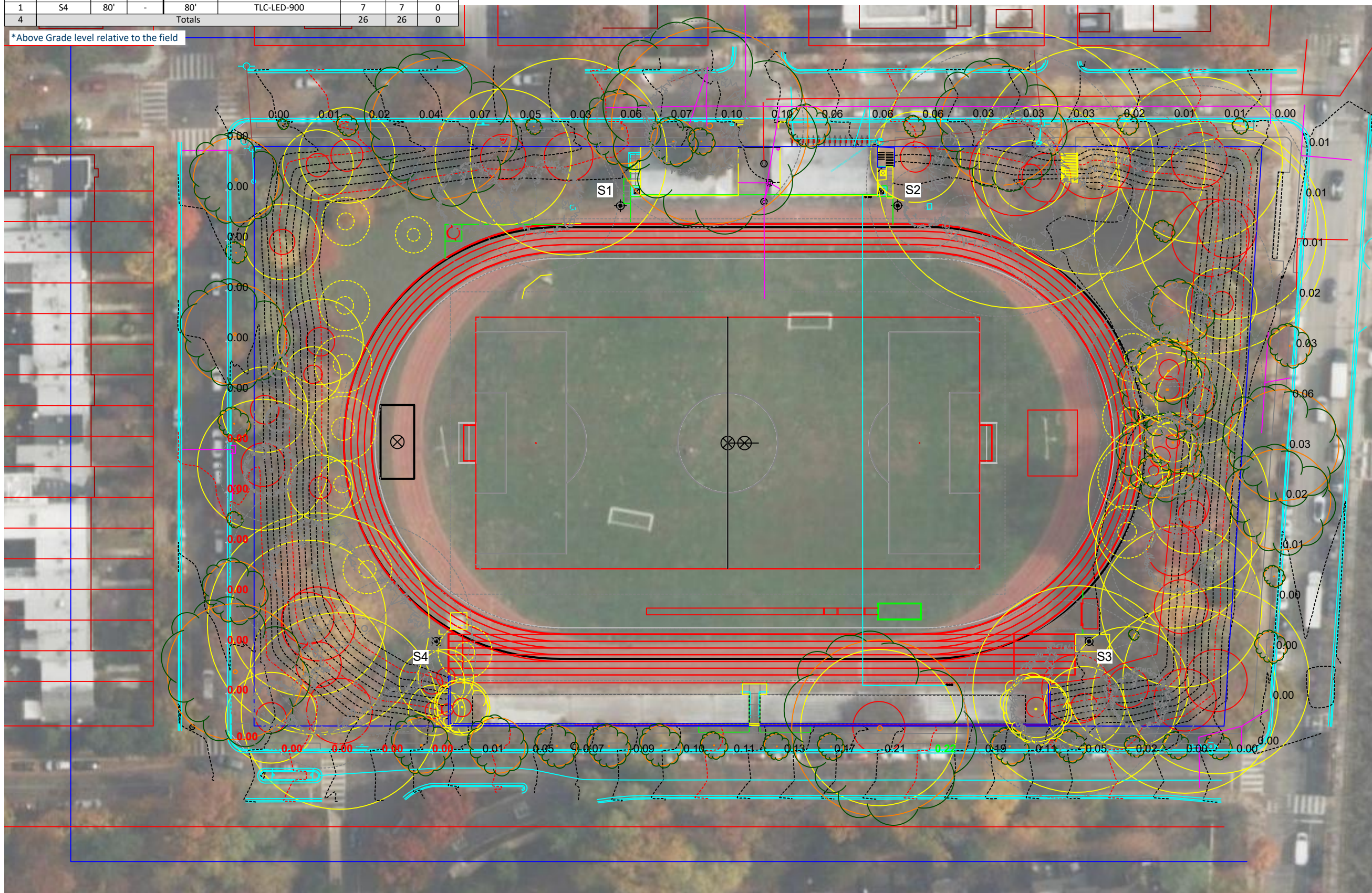
Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



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Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4	Totals					26	26	0

*Above Grade level relative to the field



Grid Summary	
Name	Property Spill Line
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary	
	INITIAL HORIZONTAL FOOTCANDLES
Scan Average	0.0381
Maximum	0.22
Minimum	0.00
CU	0.00
No. of Points	67
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗

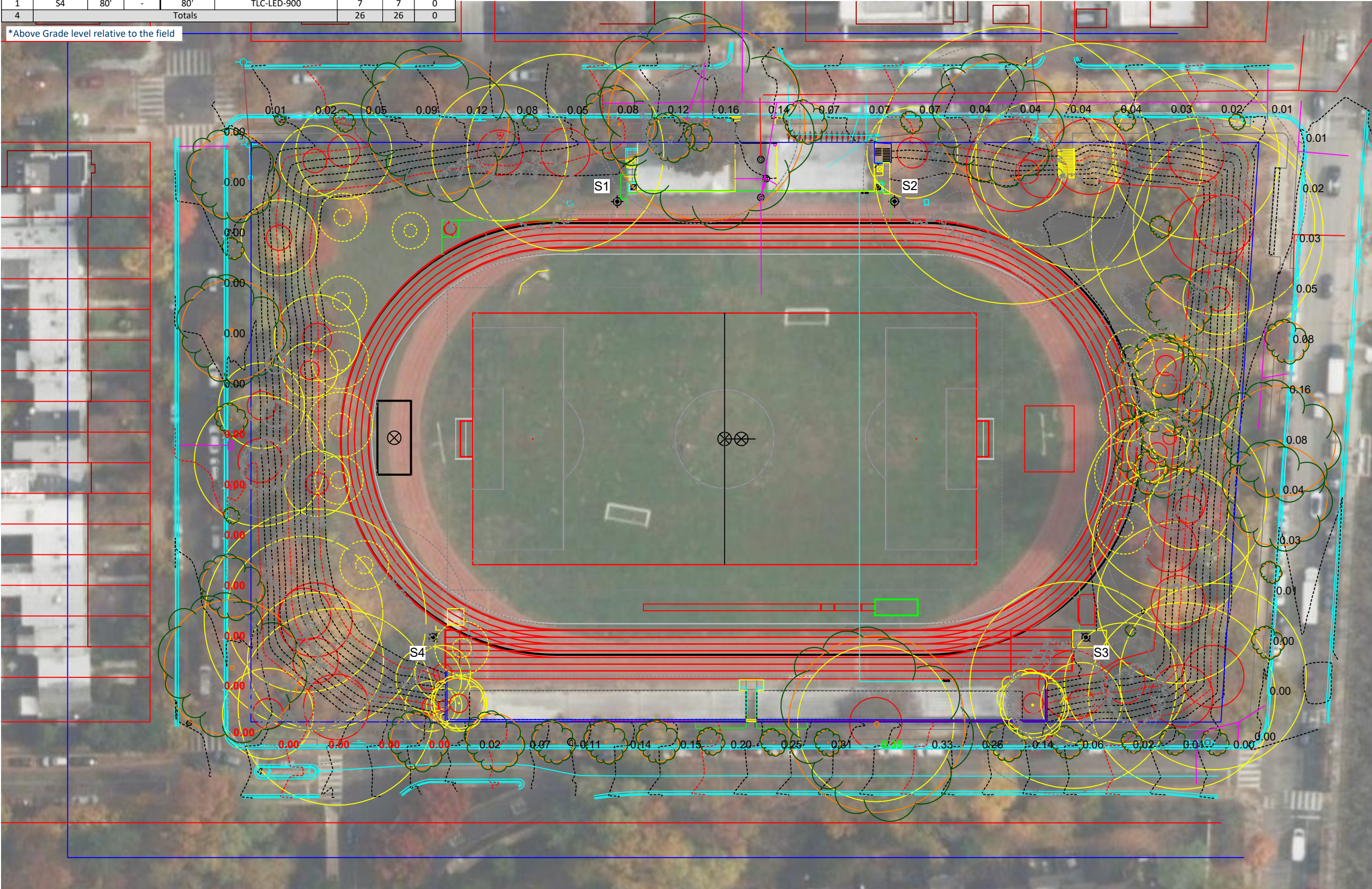


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Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4				Totals		26	26	0

*Above Grade level relative to the field



Grid Summary

Name	Property	Spill Line
	Spacing	30.0' x 30.0'
	Height	3.0' above grade

Illumination Summary

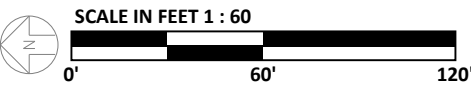
	INITIAL MAX VERTICAL FOOTCANDLES
Entire Grid	
Scan Average	0.0641
Maximum	0.35
Minimum	0.00
CU	0.00
No. of Points	67
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

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Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



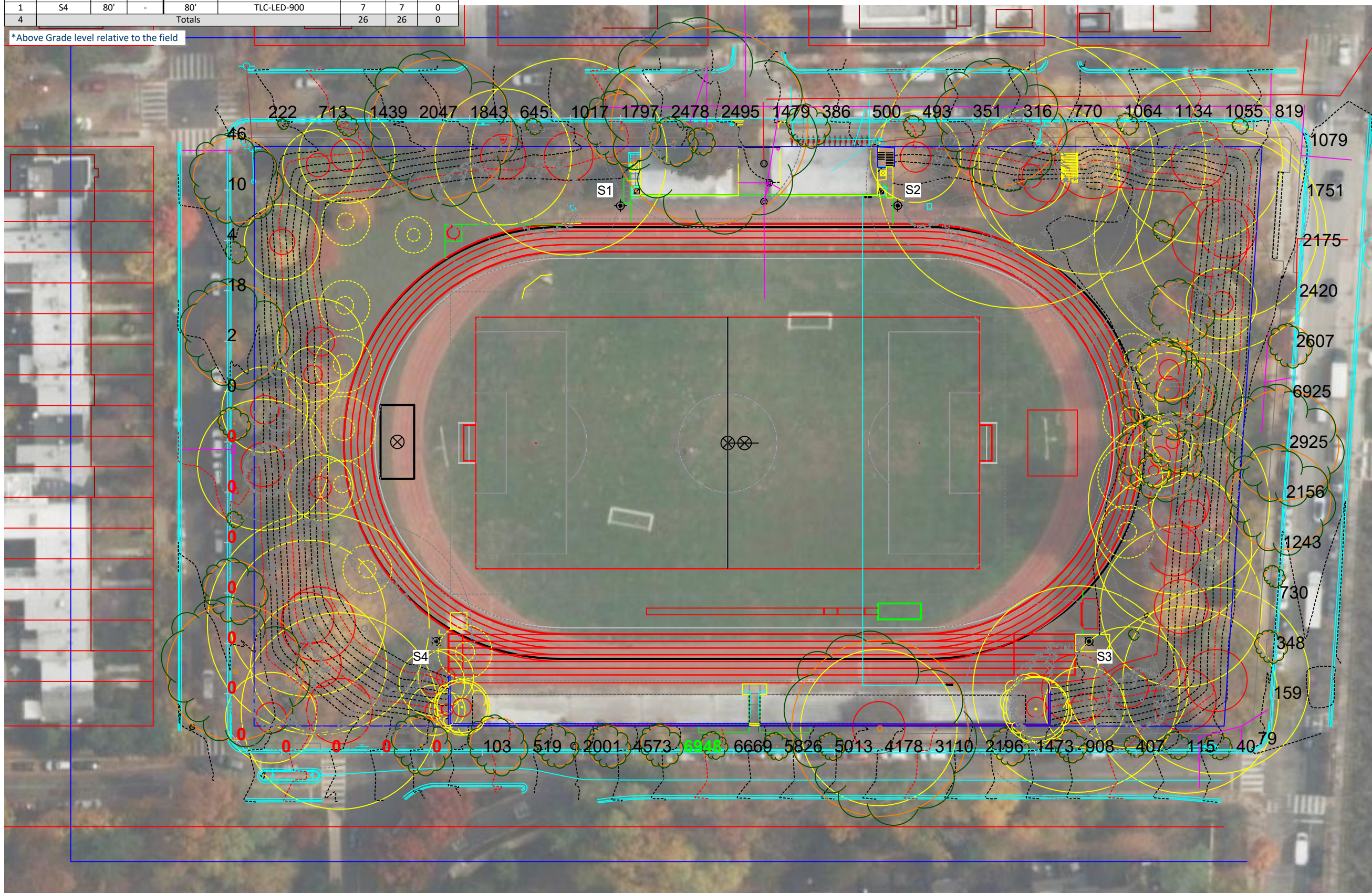
Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



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Equipment List For Areas Shown				Luminaires				
Pole								
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4				Totals		26	26	0

*Above Grade level relative to the field



Grid Summary	
Name	Property Spill Line (Cd)
Spacing	30.0' x 30.0'
Height	5.0' above grade

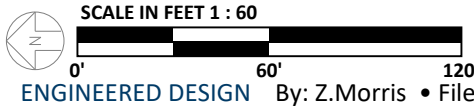
Illumination Summary	
	MAINTAINED CANDELA (PER FIXTURE)
Scan Average	1370.3743
Maximum	6947.83
Minimum	0.00
CU	0.00
No. of Points	67
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



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Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗

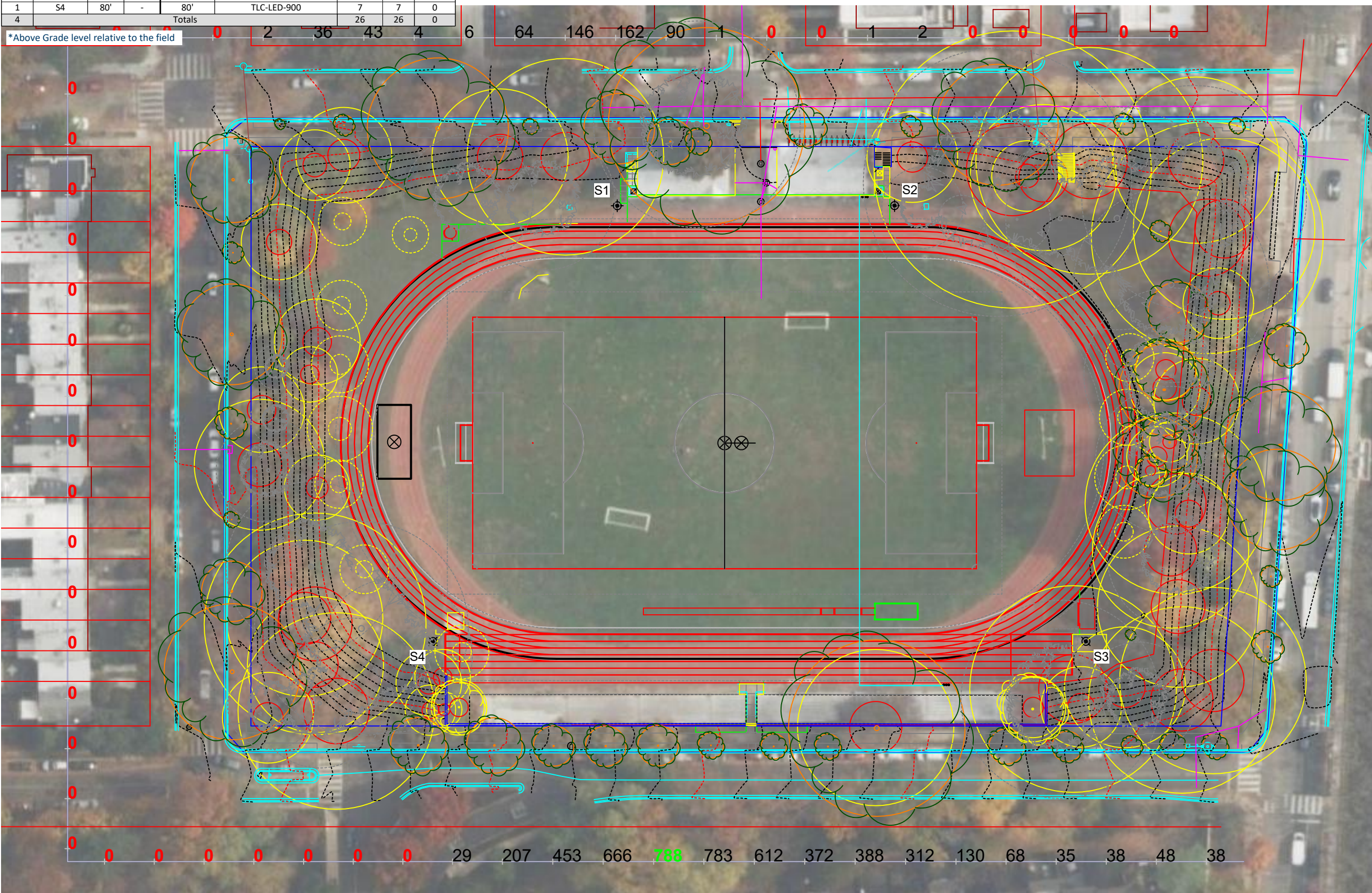


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Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4				Totals		26	26	0

*Above Grade level relative to the field



Grid Summary

Name	Building Spill Line (Cd)
Spacing	30.0' x 30.0'
Height	5.0' above grade

Illumination Summary

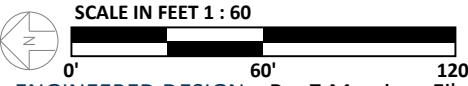
	ENTIRE GRID	MAINTAINED CANDELA (PER FIXTURE)
Scan Average	89.0826	
Maximum	788.49	
Minimum	0.00	
CU	0.00	
No. of Points	62	
LUMINAIRE INFORMATION		
Applied Circuits	A	
No. of Luminaires	26	
Total Load	24.62 kW	

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



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Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



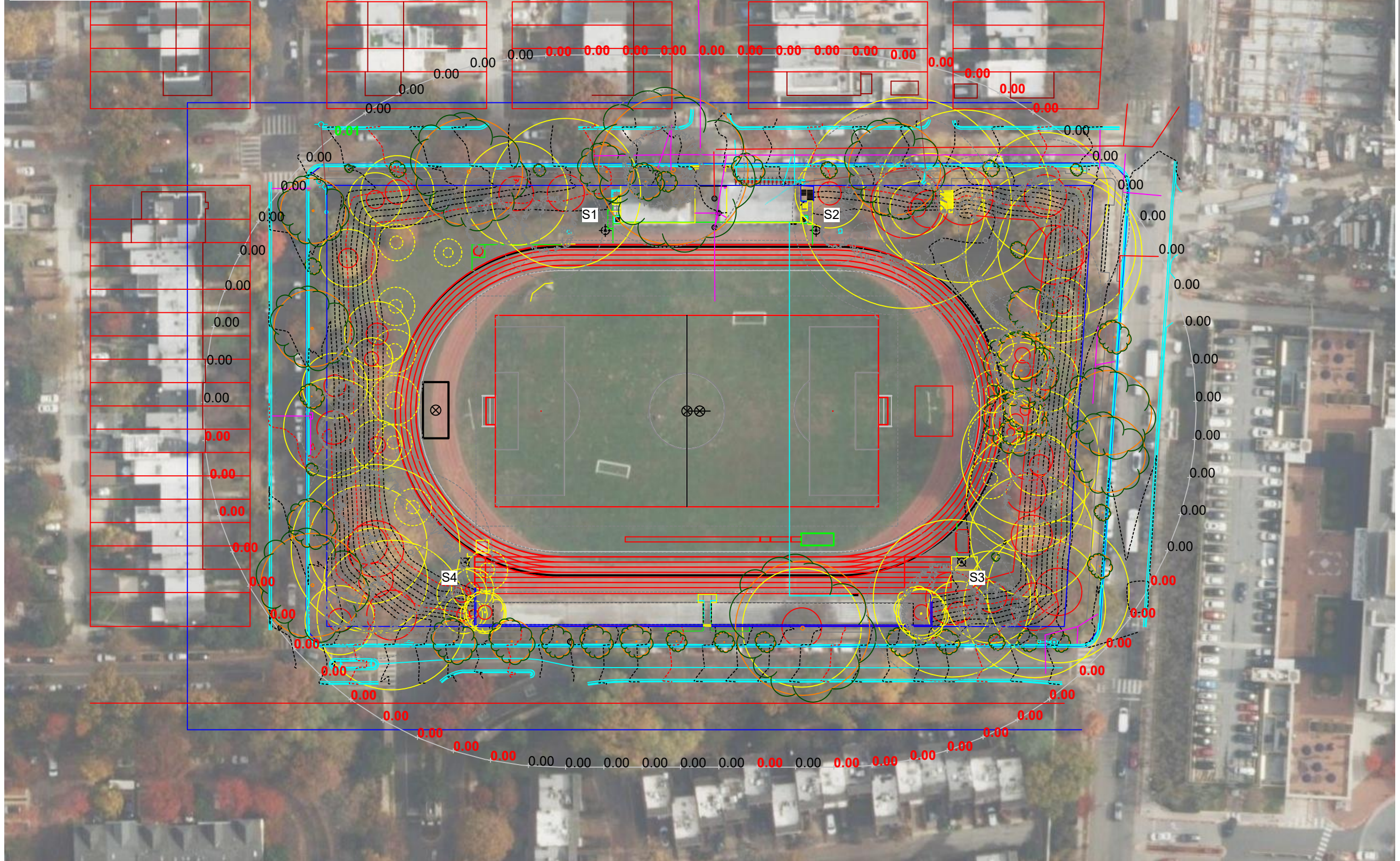
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ILLUMINATION SUMMARY

Equipment List For Areas Shown				Luminaires				
Pole								
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85.0'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4	Totals					26	26	0

*Above Grade level relative to the field



Grid Summary

Name	150' Spill
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary

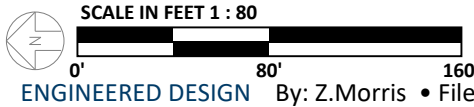
	ENTIRE GRID
Scan Average	0.0004
Maximum	0.01
Minimum	0.00
CU	0.00
No. of Points	73
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

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Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



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Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



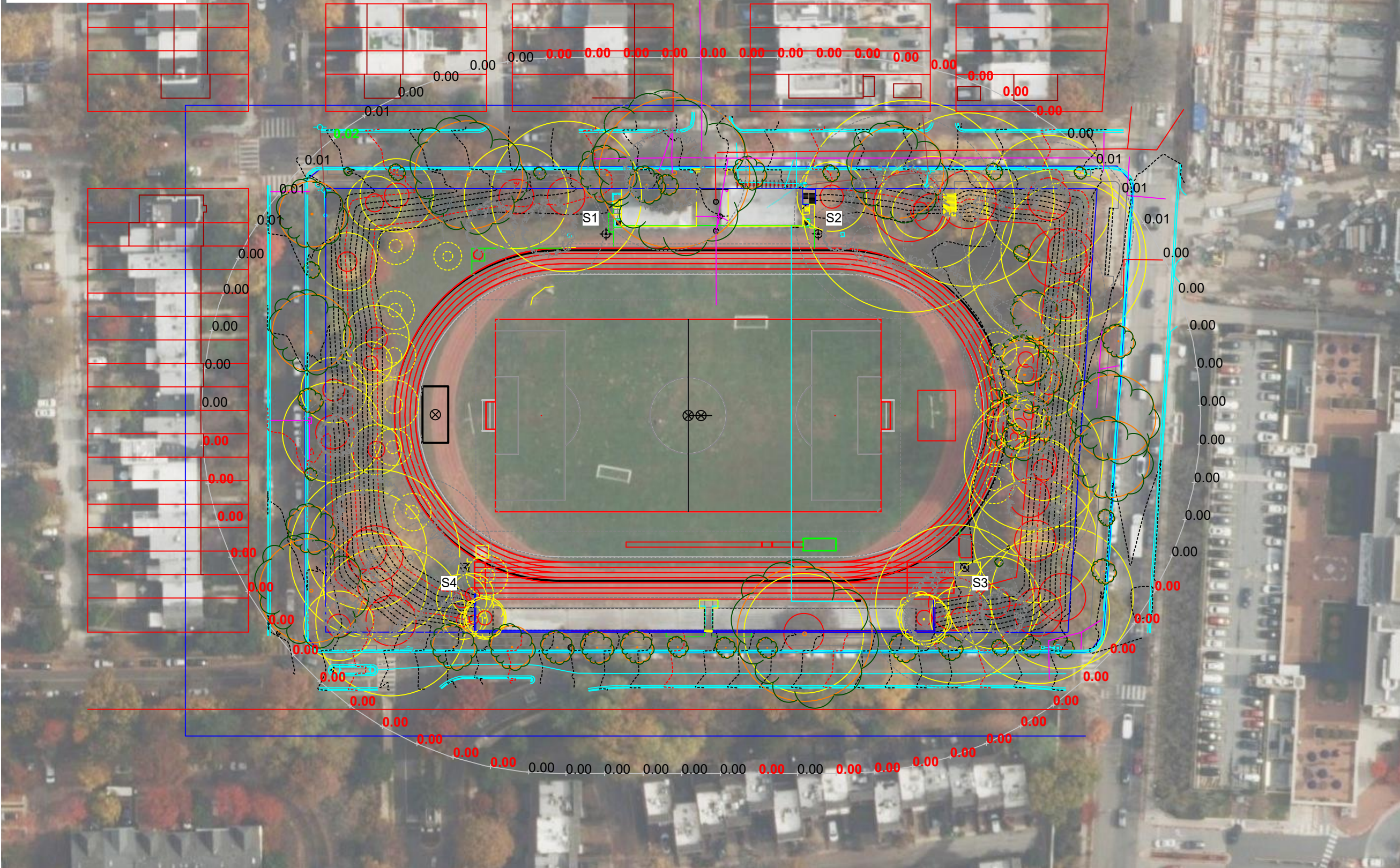
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ILLUMINATION SUMMARY

Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85.0'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4	Totals					26	26	0

*Above Grade level relative to the field



Grid Summary

Name	150' Spill
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary

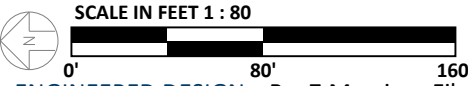
MAINTAINED MAX VERTICAL FOOTCANDLES	
Entire Grid	
Scan Average	0.0013
Maximum	0.02
Minimum	0.00
CU	0.00
No. of Points	73
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

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Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



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Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



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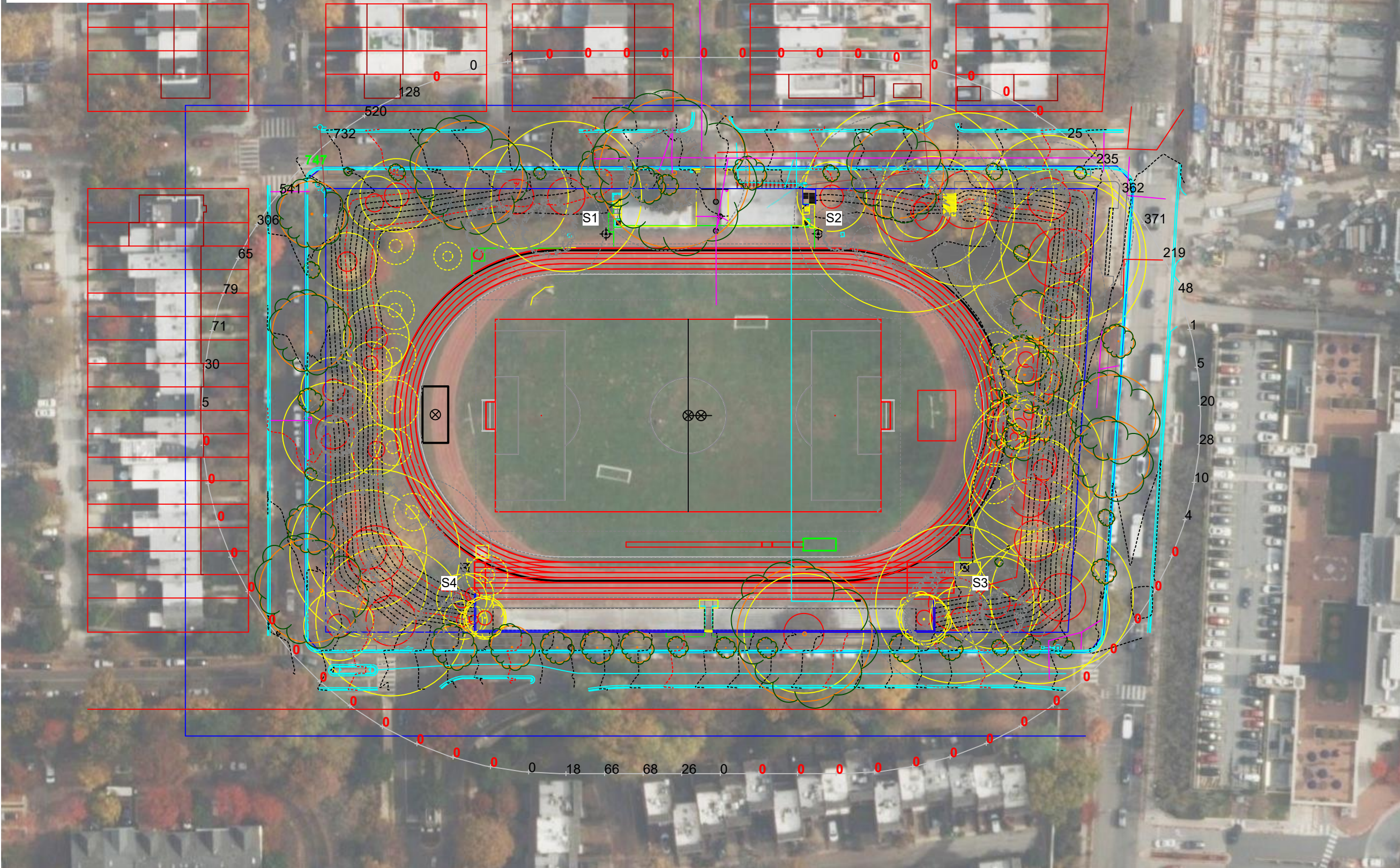
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ILLUMINATION SUMMARY

Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	-	80'	TLC-LED-1200	3	3	0
				80'	TLC-LED-900	3	3	0
1	S3	90'	-5'	85.0'	TLC-LED-900	7	7	0
1	S4	80'	-	80'	TLC-LED-900	7	7	0
4	Totals					26	26	0

*Above Grade level relative to the field



Grid Summary

Name	150' Spill (Cd)
Spacing	30.0' x 30.0'
Height	5.0' above grade

Illumination Summary

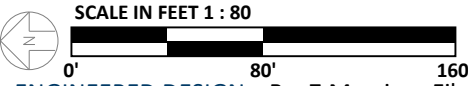
	MAINTAINED CANDELA (PER LIGHTBANK)
Scan Average	64.8063
Maximum	747.30
Minimum	0.00
CU	0.00
No. of Points	73
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	26
Total Load	24.62 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



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Pole location(s) ⊕ dimensions are relative to 0,0 reference point(s) ⊗



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ILLUMINATION SUMMARY