

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment
FROM: Karen Thomas, Case Manager
 JL Joel Lawson, Associate Director Development Review
DATE: July 16, 2025

SUBJECT: BZA Case 21341: Special Exception application of DGS/OUC to construct an antenna tower on existing government property in the MU-4/RA-1 zones.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following:

- Use variance from the zone requirement, Subtitle C § 1313.4, pursuant to Subtitle X § 1000 (Tower not permitted in RA-1 zone; Existing; 2 towers: Proposed: one tower of 500 feet in height)
- Area Variance, from the setback requirement, Subtitle C § 1313.8, pursuant to Subtitle X § 1000 (1:1 setback from any residentially developed or zoned property: existing and proposed: tower located in RA-1 zone)
- Area Variance, from the setback requirement, Subtitle C § 1313.9, pursuant to Subtitle X § 1000 (Required: setback of 20 feet or 1/3 height from all property lines 167 feet min.; Proposed: 148 feet, 11 feet, 38 feet, 396 feet)

II. LOCATION AND SITE DESCRIPTION

Address	6001 Georgia Avenue
Applicant	Government of the District of Columbia (DGS)
Legal Description	PAR 01010055
Ward / ANC	Ward 4; ANC 4B
Zone	The property is split-zoned MU-4 and RA-1. The tower is within the RA-1 zoned portion of the lot.
Historic District	N/A
Lot Characteristics and Existing Development	The large rectangular lot is currently developed with an MPD station, an accessory parking lot and two telecommunication towers and related equipment shelter.
Adjacent Properties	The square abuts a remnant of the federally controlled Fort Circle Park. The property fronts three streets and does not directly abut any residential or commercial property.

Surrounding Neighborhood Character	The neighborhood is a mix of residential types in character with the RF-1, R-2 and RA-1 zone development pattern.
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III. PROPOSAL

The Applicant, the Department of General Services (DGS) and Metropolitan Police Department (MPD) proposes demolishing the existing 700-foot self-supporting tower and the smaller 400-foot lattice tower and replace them with a single new 500-foot tower in the same general location as the 400 foot tower. The existing towers can no longer structurally support the vital telecommunication antennas which provide critical service coverage to the emergency management services and commercial carriers located on the towers.

The project is anticipated to be completed in three phases:

- **Phase I** – temporary parking on the NPS site with demolition and removal of the 400-foot tower.
- **Phase II** – Construction of the new 500 feet tower.
- **Phase III** – Demolition and removal of the 700 feet tower and related restoration of the NPS site.

Construction is expected to last approximately 12 months.

IV. BACKGROUND

The Hughes Memorial Tower was completed on January 15, 1989, at an elevation of 288 feet above mean sea level and is approximately 700 feet in height. The three-legged, free-standing star tower is owned by the District and is similar to the tower built in 1936 for the Naval Radio Transmitter Facility in Annapolis, Maryland and the Star Tower in 1991 for WSTR-TV in Cincinnati, Ohio.

In 1998, the National Capital Planning Commission approved a plan to use the Hughes Memorial Tower as part of a 9-1-1 service upgrade. Except for a much smaller transmission tower next to it, there are no nearby large structures. For these reasons, as well as its distinctive "star tower" shape and large size, the tower is prominently visible from a variety of locations in the District and Maryland.

Based on information obtained under [BZA 13524](#), it seems that the smaller tower at 400 feet was in existence prior to 1981 and thus predates the larger Hughes Tower. The District/the Department of General Services and other federal agencies as well as commercial carriers have used these towers since then for communication services. These towers support active antennas for agencies such as WMATA, Verizon, T-Mobile and other government agencies, as well as NOAA.

V. OFFICE OF PLANNING ANALYSIS

An antenna tower is permitted as a special exception by the Board in the zones specified under Subtitle C § 1313.4 (a) – (d): MU zones except MU-3; D zones; Subtitle K zones and PDR zones. Towers are permitted as a matter-of right in the PDR-4 zone.

The proposed tower would be located on a split-zoned lot (MU-4/RA-1), and entirely within the RA-1 portion of the lot. After review and discussions by the Zoning Administrator and OP, it was determined that the use of the tower would not be permitted in the zone by special exception within the RA-1 portion of the lot. Therefore, the Applicant amended the application to include use variance relief from the requirement pursuant to **C § 1313.4**.

In addition, the proposed tower would not satisfy the following area requirements:

- The setback requirements of Subtitle **C § 1313.8** - a minimum horizontal distance equal to its total height as measured from the ground, from any residentially developed or zoned property; **and**
- The setback requirements of Subtitle **C § 1313.9** -Each part of an antenna tower or monopole shall be set back from each lot line the greater of twenty feet (20 ft.); or a distance of at least one-third (1/3) of the total constructed height.

a. Use Variance Relief from Subtitle C § 1313.4

i. Extraordinary or Exceptional Condition Resulting in Undue Hardship To the Property Owner

a. Extraordinary or Exceptional Condition or Situation

The property is District-owned, managed by the Department of General Services (DGS) and is currently developed with two towers and a Metropolitan Police Department (MPD) unit. As previously stated, the property is split-zoned and the MPD building is well within the MU-4 portion of the lot. The existing towers, which came into commission prior to and during the 1980's, are primarily used by local and federal government services and commercial carriers which support OUC's 9-1-1 Emergency Management operations. The lot's elevation at 288 feet above sea level is an important feature of the lot, which was a strategic part of a fort and more so as a telecommunication site where communication signals could function efficiently without undue obstructions due to the topography and towers heights.

Given the longstanding use of this District-owned property for the City's and federal agencies operations, the use of towers on the lot is an exceptional situation not typical of other RA-1 lots in the District. Therefore, the confluence of its elevation, longstanding use and ownership by the District for both District and federal communication purposes create an exceptional situation unique to this lot.

b. Exceptional or Undue Hardship

The exceptional situation of the long-standing use for government services and its ideal location due to the site's elevation creates undue hardship on the property owner to provide critical services to District residents if the new tower was not permitted. The two existing towers are now structurally unsound due to age and must be demolished and replaced to support continued mandated services of the federal and District agencies, while allowing for additional antennas to support future expanded services.

ii. No Substantial Detriment to the Public Good

The proposed demolition of the two older existing towers and related consolidation of antennas onto one, 500-foot tower would prevent significant loss of coverage to critical intelligence communities, would ensure continuous signalization to existing and new antennas, and services to residents in the immediate future. The proposed new tower would support the government needs for wireless coverage, as any operational loss in coverage could significantly interrupt critical emergency 9-1-1 services for the public.

iii. No Substantial Impairment to the Intent, Purpose, and Integrity of the Zoning Regulations

Impairment to the intent of the Regulations, in this case, is not anticipated. The consolidation of operations of two long-standing operational towers into one structure would minimize impacts, ensuring that important sightlines both to and from the area would not be substantially impaired. The tower would be 200 feet lower than the tallest existing Hughes Tower (700 feet).

b. Area Variance Relief from:

- **Subtitle C § 1313.8;** minimum 1:1 setback from any residentially developed or zoned property
- **Subtitle C § 1318.9:** set back from each lot line the greater of twenty feet (20 ft.); or a distance of at least one-third (1/3) of the total constructed height.

i. Extraordinary or Exceptional Situation Resulting in Practical Difficulties

a. Extraordinary or Exceptional Situation

The lot has been used for approximately 50 years as a telecommunication facility for the District, including the 400-foot tower which predates the 700-foot tower (1989) and current Zoning Regulations. The type of structure needed to support critical communication functions for multiple District and Federal agencies is atypical and its replacement while lower in height (500 feet) than the tallest structure would not meet the required setback from a residential property, as it is within the residential zone with homes across Peabody Street, 9th Street and Quackenbos Street. The tower would be nonconforming to this requirement if placed anywhere on the property due to its required function and related height and the dimensions of the property. The Applicant does not own the adjoining property (which is federally owned) to increase the size of the property.

Similarly, the required setback from the lot lines of 20 feet or 1/3 of its height of approximately 167 feet also could not be satisfied if the tower was placed anywhere else on the lot. The District-owned property is not wide (220 feet) or long (453 feet) enough to satisfy this requirement and the District has no viable alternative in siting the tower to satisfy the setback requirement. Based on the information provided by the Applicant, the tower setback would vary - 148 feet, 11 feet, 38 feet and 396 feet from the property lines ([See Exhibit 2 – DC Surveyor's Plat](#)).

b. Exceptional Practical Difficulties

The tower height and the property size create a practical difficulty for the Applicant in satisfying both setback requirements from the residential homes and from the property lot lines. The tower could not be constructed at a lower height to meet communication efficiencies critical to the District's and Federal agencies' functions.

Therefore, the Regulations would create a practical difficulty for the Applicant in utilizing the improved communication tower as intended.

iv. No Substantial Detriment to the Public Good

Substantial detriment is not anticipated since District residents' critical communication needs would continue to be met by a safer, structurally sound tower, at a height that, although lower than the existing tower, would support existing and future needs for expanded services.

v. No Substantial Impairment to the Intent, Purpose, and Integrity of the Zoning Regulations

Impairment of the integrity of the Regulations is not anticipated as the Applicant has received a waiver allowed under the Height of Buildings Act of 1910 (Height Act) from the Department of Buildings (DOB) to exceed the applicable height requirements of the Height Act in support of the city's emergency communication needs.

Apart from the requested relief, the tower would satisfy the conditions of C §§§ 1313.6, 1313.7, and 1313.11 as reviewed in the following table.

c. 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>	As discussed as part of the requested use variance, the proposed tower is intended to continue to support the District's Emergency Management System consistent with the District's policies. The new tower would replace two structures, appreciably less in height than the tallest 700 feet tower. OP does not anticipate an adverse visual impact on residential neighborhoods closest to the site beyond what has existed for more than 45 years.
(b)	<i>Designed and available for collocation by other service providers;</i>	The proposed tower would be designed for expanded coverage and capacity by 25% as may be needed for future collocation of commercial carriers – Verizon and T-Mobile are current providers. The existing towers support federal and District intelligence needs and the related antennas would be transferred to the new tower.
(c)	<i>Located so the visual impacts are minimized to the greatest practical extent, from neighboring</i>	The tower would be visible from public space and some surrounding jurisdictions. The existing towers

Section	Criteria	OP Response
	<i>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>	have been a part of the landscape in this area and beyond for more than 45 years. At grade, the property in the vicinity of the tower would continue to be screened by the existing brick wall along Peabody Street.
(d)	<i>Designed and constructed to preserve existing trees to the greatest practical extent.</i>	No trees would be removed for this project. The tower would be placed on the existing site of the 400-foot tower.
§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><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>The tower would replace aging infrastructure and continue support functions for antennas which provide critical emergency communication for several District and Federal agencies. As the Applicant stated, “<i>If the Proposed Antenna is not constructed in a timely manner, there will be a significant disruption to critical emergency and operational communications, resulting in a clear and unacceptable gap in service.</i>”</p> <p>The District has no available property at this elevation within a 2-mile radius. The existing nearby and surrounding structures do not meet the required height to satisfy coverage needs for the District's communication.</p> <p>At this location the 500-foot replacement tower would generate the least impact due to visibility since it would be located where two towers have existed for over 45 years. The new tower would be 200 feet lower and would not generate additional adverse impacts due to light, air or shadows beyond what currently exists.</p> <p>The Department of General Services received a Height Act waiver shown as Attachment II in this report. The replacement tower would be less visually intrusive thus presenting negligible impacts on surrounding neighborhoods than the current structures.</p> <p>The tower will comply with all FCC requirements.</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 proposal received a Height Act Waiver from the Department of Buildings – Attachment II.
§1313.8	<i>An antenna tower or monopole shall be set back a minimum horizontal distance equal to its total</i>	The tower will not satisfy the 500-foot setback from the closest residential properties. However, the

Section	Criteria	OP Response
Relief Requested	<i>height as measured from the ground, from any residentially developed or zoned property.</i>	application satisfies the requested area variance relief discussed prior.
§1313.9 Relief Requested	<i>Each part of an antenna tower or monopole shall be set back from each lot line the greater of the following: (a) Twenty feet (20 ft.); or (b) A distance of at least one-third (1/3) of the total constructed height.</i>	The proposed tower would not conform to the setback requirements. The application satisfies the requested area variance relief from this requirement as discussed prior.
§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	<i>The applicant shall provide written and/or graphic documentation of the following: (a) The area to be served by the proposed new antenna tower or monopole; (l) Other information as may be necessary for impact assessment of the antenna tower or monopole.</i>	The project is intended for the continuation of District-wide critical services. In this case the area requirements under this section is District and region wide to the extent that 9-11 services cover the District and federal uses also serve the region as in the tenants include WMATA, the FBI and NOAA among others. The commercial antennas are collocated as a matter-of right and will continue their function to serve the residents within their coverage areas. OP does not require additional information for the impact assessment of the replacement tower.

VI. COMMENTS OF OTHER AGENCIES

- a) Attachment II of this report includes the Height Act Waiver issued by the Department of Buildings (DOB) dated October 10, 2023, in support of the tower's height increase.
- b) The National Capital Planning Commission also voted in support of the replacement tower in its letter dated November 8, 2024 (Attachment III).
- c) The Commission of Fine Arts (CFA) also gave its final approval on September 19, 2024.

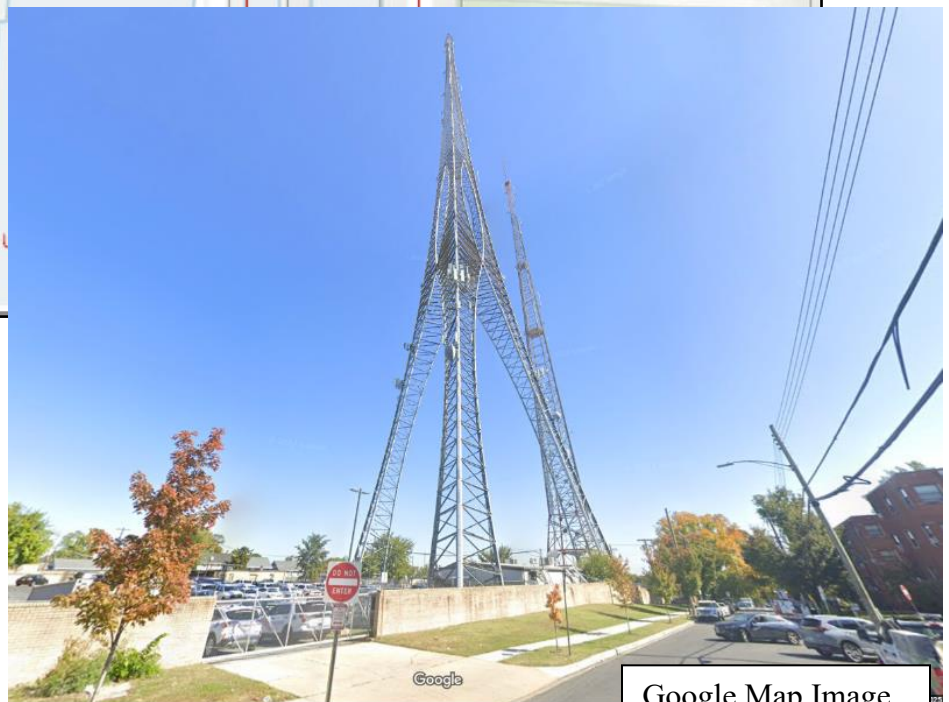
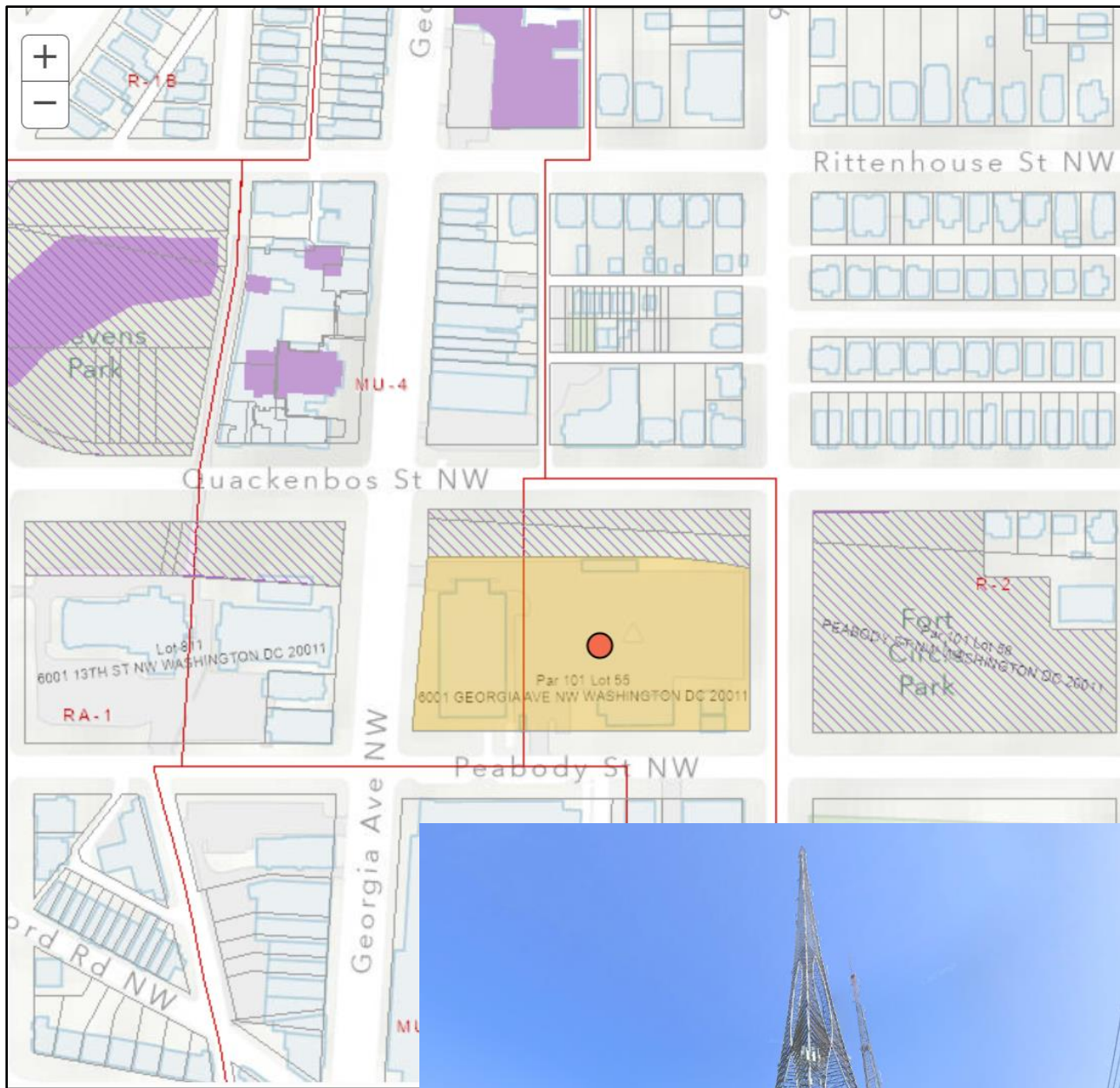
VII. ANC COMMENTS

The Applicant provided that a special meeting was held on July 6, 2025, by ANC 4B which voted in support of the relief requested. ([Exhibit 15, Page 7](#))

Attachments:

- 1. Zoning Map
- 2. Department of Building (DOB) – Approval to exceed Height Act - Height Act Waiver
- 3. National Capital Planning Commission (NCPC) Recommendation

ATTACHMENT I - ZONING MAP and VIEW



Google Map Image

ATTACHMENT II



**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF BUILDINGS
Office of the Director**

October 10, 2023

SENT FIRST-CLASS U.S. MAIL

Spiro P. Gianniotis, AIA, NCARB, LEED AP BD+C, GPCP, GGP
Principal Alphatec
PC 1525 18th St NW
Washington, DC 20036

Re: Approval to exceed Height Act for new tower at 6001 Georgia Avenue, NW

Based on discussions with the District of Columbia Metropolitan Police Department (MPD), and as requested in a September 21, 2023 letter from you, the District of Columbia Department of Buildings (DOB) has learned that consolidation of two structurally-insufficient existing towers at 6001 Georgia Avenue, NW, into one 500 ft tower is necessary in order to prevent a significant loss of coverage to critical intelligence communities, and to provide continuous services to existing and possible new antennas in the future. The proposed new tower would accommodate the government authorities' needs for wireless coverage, as any lapse in the operation of the antennas would significantly interrupt critical service in the area; one of the functions reliant on the tower construction is the emergency 9-1-1 services for the public.

MPD has represented to DOB that the project involves the demolition of one existing 400ft Self Supporting Tower (SST), relocating all of its existing antennas to a new 500ft SST, and lastly, demolishing the existing 700ft SST. The goal of the project is to demolish the current existing towers that are structurally incapable of accommodating existing equipment belonging to critical public entities such as Federal Bureau of Investigation, the Washington Metropolitan Area Transit Authority, and Office of Unified Communications among others, while also allowing for the addition of more antennas and expansion of services of those entities in the future.

Department of Buildings | 1100 4th St SW, Washington, DC 20024 | 202.671.3500 | dob.dc.gov

The new tower would exceed the height otherwise allowed under the Height of Buildings Act of 1910 (Height Act). For this reason, the new tower would require the Director of DOB to approve this tower to exceed the otherwise-applicable height requirements of the Height Act.

Pursuant to the District of Columbia Reorganization Plan No. 1 of 1983, the Department of Buildings Establishment Act, the Height Act, and my authority in 12A DCMR, I hereby approve the proposed height of the new tower to allow MPD to construct at 6001 Georgia Avenue, NW one Self-Supporting Tower that is 500 feet above grade consistent with the plans submitted to DOB as part of your September 21, 2023 request to me.

Sincerely,

Brian J. Hanlon
Acting Director
Department of Buildings

Cc: Pamela A. Smith, Acting Chief, MPD Nikki
Lavenhouse, Commander, 4D Delano
Hunter, Director, DGS
Kathleen A. Beeton, Acting Zoning Administrator, DOB

ATTACHMENT III



401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 www.ncpc.gov

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The Honorable James Comer

Mayor
District of Columbia
The Honorable Muriel Bowser

Chairman
Council of the District of Columbia
The Honorable Phil Mendelson

Executive Director
Marcel Acosta

IN REPLY REFER TO:
NCPC File No. 8595

November 8, 2024

Mr. Satish Bagai
District of Columbia Department of General Services
3924 Minnesota Avenue, NE
Washington, DC 20019

Dear Mr. Bagai:

The National Capital Planning Commission, at its November 7, 2024 meeting, approved the enclosed action on the preliminary and final site and building plans for the Communications Tower Replacement located at 6001 Georgia Avenue, NW, Washington, DC. A copy of the Executive Director's Recommendation for the project is available online at www.ncpc.gov/review/archive/2024/11/ as part of the meeting materials.

Implementation of the project may require review by local agencies, including the issuance of permits pursuant to regulations promulgated under the authority of federal environmental statutes.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcel Acosta".

Marcel Acosta
Executive Director

Enclosures

cc: Ms. Anita Cozart, Director, DC Office of Planning
Mr. Thomas Luebke, Secretary, U.S. Commission of Fine Arts