

Board of Zoning Adjustments

441 4th Street NW, Suite 2005

Washington DC 20001

**Re: Applicant Statement: Special Exception for Telecommunications Antenna Tower –
151 T Street NE**

To Whom it May Concern:

This application requests a special exception from the Board of Zoning Adjustment (BZA) for the construction of a new telecommunications antenna tower at 151 T Street NE, Washington, DC, in accordance with DC Zoning Code Subtitle C §1313. The tower, 94 feet in total height (antenna elevation center at 90 feet), will replace an existing light pole on the high school football field. The existing light fixture will be re-mounted onto the new tower. This project will ensure continued lighting while improving telecommunication services in the area.

This statement addresses each requirement of Subtitle C §1313:

Subtitle C § 1313: Antennas Subject to Board of Zoning Adjustment Approval

1313.1: *A monopole shall be permitted if approved by the Board of Zoning Adjustment in accordance with Subtitle X of this title, subject to the provisions of this section, in the zones specified in Subtitle C § 1313.2.*

Our Response: The proposed antenna tower will be located in zone RF-1, which permits antenna towers as a special exception under §1313.2. The proposed project will follow Subtitle X for special exception applications, as required.

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.*

Our Response: The property is zoned RF-1

1313.3: *An antenna tower, either alone or in conjunction with a studio, or the erection, alteration, or use of buildings for transmission or reception equipment on the same lot, shall be permitted if approved by the Board of Zoning Adjustment in accordance with Subtitle X of this title and subject to the provisions of this section, in the zone specified in Subtitle C § 1313.4.*

Our Response: No response required

1313.4: *An antenna tower may be permitted as a special exception in the zones of:*

(a) MU, except MU-3;

(b) D;

(c) Those zones listed in Subtitle K; and (d) PDR, except PDR-4 and PDR-7, where antenna towers are permitted as a matter-of-right.

Our Response: This property is zoned RF-1

1313.5: *The location, height, and other characteristics of an antenna tower or monopole shall be:*

(a) Consistent with the purpose of this chapter;

(b) Designed and available for collocation by other service providers;

(c) 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 antenna tower or monopole;

(d) Designed and constructed to preserve existing trees to the greatest practical extent.

*Our Response: * (a) **Consistent with the purpose:*** The tower will improve telecommunications services in the area, a key goal of antenna regulations.

** (b) **Designed for collocation:*** The tower's design will be designed to accommodate antennas by other service providers. This information is detailed in construction plans submitted to the BZA.

** (c) **Minimized visual impacts:*** The tower's height and location will be carefully considered to minimize visual impact on the surrounding neighborhood and adjacent properties. The tower will replace existing football field light poles to visually blend into the existing landscape. The new proposed tower will support the existing light fixtures, reducing the need for additional towers/light poles

** (d) **Preserve existing trees:*** No trees are proposed to be removed for this project.

1313.6: *If an applicant is unable to meet the special exception requirements of this section, the Board of Zoning Adjustment may nevertheless grant the application if the applicant demonstrates that:*

(a) There is a significant gap in wireless service;

(b) The proposed antenna tower or monopole will fill this gap;

(c) No other mounting options are available;

(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;

(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;

(f) That it is using the least intrusive means to provide wireless service necessary to fill the gap in such service; and

(g) That the proposed antenna tower and monopole, even when supporting all possible co-locators will be in full compliance with Federal Communication Commission cumulative and individual RF emission levels.

Our Response: N/A. Proposed project meets the special exception requirements of this section

1313.7: *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.*

Our Response: N/A, this tower satisfies the Height Act of 1910.

1313.8: *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.*

Our Response: The 90 foot tower will be located approximately 350 feet from the nearest property line.

1313.9: *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.

Our Response: The tower's design will comply with the specified setback requirements. It will be set back approximately 350 feet from the nearest property line and construction plans will show compliance.

1313.10: *The Board of Zoning Adjustment shall submit the application to the Office of Planning for review and report.*

Our Response: No response required

1313.11: *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;

(b) The area being inadequately served;

(c) A map indicating the location of any other antenna or related facility sites providing service by the applicant within a (2) mile radius, including public space, of the proposed site;

(d) Other towers or monopoles within a (2) mile radius of the proposed site with identified heights above grade;

(e) An explanation of why the applicant cannot collocate on an existing tower or monopole;

(f) A written statement agreeing to permit the collocation by other service providers on a commercial basis on an antenna tower;

(g) A written statement agreeing to design a proposed monopole for at least (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);

(h) The topographic conditions of the area to be served;

(i) The relative height of the antenna tower or monopole to the tops of surrounding trees within on-quarter mile (.25 mi) radius of the proposed site as they presently exist;

(j) The proposed appearance of the antenna tower or monopole, including exterior finish

(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

(l) Other information as may be necessary for impact assessment of the antenna tower or monopole.

Our response: The above requirements will be included in the application as separate attachments.

Conclusion: The proposed telecommunications antenna tower at 151 T Street NE will meet all requirements of Subtitle C § 1313 and is a valuable addition to the community. The tower will help bridge the gap in communication service in the area while preserving the aesthetic appeal of the high school. The proposed tower will replace an existing light pole, which will minimize the required footprint for the installation, as well as reduce the visible impact of the monopole. We request that the BZA grant a special exception for this project.

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