GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

Office of the Director

MEMORANDUM

ZONING COMMISSION
District of Columbia
Case 01-36
Exhibit 51

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DATE: June 28, 2002

TO: Zoning Commission

FROM: JLS for Andrew Altman, Director

RE: Case Number 01-36: UCC Supplemental Information
Antenna Plan and Amenity Package

AMENITY PACKAGE

OP understands the amenity package to be amended from the original application and now consists of:

1) Financial contribution for the campus master plan and
2) 1.2 million dollars to be contributed to a historic preservation mitigation fund that shall be used, at a minimum, to stabilize the barn and stable, with the remainder to be applied to adaptive reuse of the cottages or further work on the barn and stables as determined by the Historic Preservation staff and the State Historic Preservation Officer.

Based upon this amenity commitment by the applicant, OP recommends approval of the amenity plan.

IMPORTANT CLARIFICATION:

In the supplemental material submitted by the applicant, in the section titled Historic Amenity Package, the applicant has provided a copy of an internal memo that identifies the historic amenity as "*Proposed Historic Mitigation Program.*" The introductory paragraph, addressed to Ms. Peck, states that *"the State Historic Preservation Office staff have approved the proposed plan,...*"

OP must stress that the historic amenity is not an approved mitigation plan by the State Historic Preservation Office staff, but rather is a zoning amenity proposed by the applicant as part of their PUD proposal. The PUD amenities cannot by-pass or supersede any mitigation plans that may be required under the MOA transferring the East Campus of Saint Elizabeth's to the District of Columbia or any Federal Section 106 review.

OP must also stress that the Office of Planning cannot speak for the State Historic Preservation Officer, to whom the State Historic Preservation Office staff must provide recommendations.

ANTENNA PLAN

At the April 18, 2002 public hearing on this case, the Zoning Commission asked the applicant to submit several items of supplemental information including a detailed antenna plan. At the June 10, 2002

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meeting the Commission asked the Office of Planning to comment on the proposed antenna plan relative to the newly proposed antenna regulations amendments.

The following table represents the information:

Antenna Type	Proposed for UCC project	Permitted by Proposed Regs	Relief	Notes
Whip or stick (roof-mounted)	47 total (25 live) (22 dummies)	2 Exempt; Rest by special exception	PUD or Special Exception	
Dish (roof-mounted)	6	Subject to location-criteria because diameter and height	None needed;	Dishes meet location criteria and are proposed inside the parapet wall.
Yagi (roof- mounted)	2	2 Exempt	None needed; Meets location criteria	
Ground Plane & Disk-cone (pole- mounted)	10	Subject to Special Exception	PUD or Special Exception	These are mounted atop poles such as light poles

The proposed antenna regulations allow for an unlimited number of roof-top mounted antennas, either as exempt antennas, antennas subject to location-based criteria or antennas approved by special exception. Pole mounted antennas should be subject to special exception review. Section 2405.7 of 11DCMR specifies that the Zoning Commission may approve special exception uses or modifications as part of a Planned Unit Development (PUD) approval.

The intent of the existing and proposed antenna regulations is to minimize the visibility of antennas. Both regulations promote a "one-to-one" setback (one foot of setback for each foot of height) to help achieve this intent but allow for deviations from this standard through special exception review. It is recognized that in this case, the antennas are integral to the operation of the UCC and their quantity makes them visible. The applicant has attempted to integrate the antennas into the design of the roof and site. The design includes 22 "dummy" whip antennas along the roof to balance the aesthetic placement.

The dummy antennas can by replaced by live antennas as needed. The antennas with the most visibility are the proposed roof-mounted dishes. The two larger dishes are shown with a total mounted height of 13'4" and with setbacks between 17 and 25 feet from any edge of the roof. While the setback will minimize the visibility of the dishes from the adjacent grounds, the elevation of the site is such that the dishes may be visible off the site.

The applicant has provided several views of the building with antennas from sites along MLK and both campuses. Based on the renderings, OP recommends Option A as the preferred placement for the dish antennas. As stated at the bottom of page 27L "Although the symmetry is lost in this design, it represents a rather limited visual impact worth considering." The illustrations for this option show a dramatic reduction in their visibility.

The Office of Planning believes the antennas are fundamental to the operation of the UCC and within the scope of the proposed antenna regulations. **OP recommends that the antenna plan be approved with the Option A as part of the UCC PUD.**

AA/jls$_{AICP}$