

May 18, 2018

VIA HAND DELIVERY AND IZIS

Anthony Hood, Chairperson
District of Columbia Zoning Commission
Office of Zoning
441 4th Street NW, Suite 200
Washington, DC 20001

Re: Application of Verizon Wireless for Modification of Consequence of an Approved Planned Unit Development (Zoning Commission Order No. 02-45, 04-08, 04-08A, 04-08B, 04-08C) to allow a temporary Cell on Wheels on Square 5868, Lot 0805 – Supplemental Information

Dear Chairman Hood and Members of the Commission:

On behalf of Celco Partnership d/b/a Verizon Wireless (“**Verizon**” or “**Applicant**”), the Applicant for a Modification of Consequence to the Planned Unit Development approved in Zoning Commission Order Nos. 02-45, 04-08, 04-08A, 04-08B, and 04-08C (the “**PUD**”) to allow a temporary Cell on Wheels (“**COW**”) on the campus of St. Elizabeths Hospital at Square 5868S, Lot 0805 (the “**Property**”), we hereby submit this letter to supplement the application for a Modification of Consequence submitted to the Zoning Commission on May 2, 2018 as Case No. 04-08D/02-45 (the “**Initial Application**”). This letter provides additional information about the proposed COW and request for a Modification of Consequence in response to discussions the Applicant has had with the Office of Planning.

I. Background and Applicant’s Request

The Applicant is requesting a Modification of Consequence to the PUD to address an anticipated loss of antenna coverage at the St. Elizabeths campus and surrounding area. The Applicant currently provides service to this area through 12 antennas situated on an existing water tower on the St. Elizabeths campus at a center line height of 130 feet. This water tower is scheduled for imminent demolition in the summer of 2018, which necessitates the removal of the existing antennas and will cause a loss of coverage. The coverage gap will result in an increased burden on surrounding antenna sites, and will impact surrounding residences as well as several government agencies that operate in the immediate area, including the Department of Homeland Security, the US Coast Guard, and the Office of Unified Communications.

In order to maintain service to this area, antennas must be replaced in a nearby location and at the same relative elevation as the antennas currently located on the water tower. The target area served by the existing antennas is to the west of the St. Elizabeths campus and the COW is proposed to be located in the northeast area of the St. Elizabeths campus. Therefore, in order to maintain service to the target area to the west, a COW of 150 feet in height located as shown on the location map submitted with the Initial Application is necessary.

II. Modification of Consequence

A Modification of Consequence is appropriate for this request. As described in the Initial Application, there are no other structures that can accommodate the antennas in the area of the St. Elizabeths campus. Most important in terms of this application being considered as a Modification of Consequence, the proposed COW is temporary, and will address an immediate need to maintain current service. The proposed COW essentially relocates the existing antennas that are currently located on the water tower to an adjacent location. The antennas are already located adjacent to the PUD site, and are being relocated onto a temporary COW as a result of demolition of the water tower. The relocation of the antennas onto the COW falls within the types of modifications that are categorized by the Zoning Regulations as Modifications of Consequence, such as “relocation of architectural elements and open spaces.” Once a permanent structure on which to locate the antennas is available, the Applicant plans to seek additional approvals as necessary.

III. Special Exception

Included with its request for a Modification of Consequence, the Applicant is also seeking a special exception to approve the COW. As set forth in Subtitle C §303.13 of the Zoning Regulations, as part of a PUD, an applicant may request approval of any relief for which special exception approval is required. Subtitle C §1313.2 provides that a monopole may be permitted as a special exception use in the MU zones and Subtitle C §1313.4 provides that an antenna tower may be permitted as a special exception in the MU zones (except the MU-3 zone). The COW will be located in the SP-1 zone district (now the MU-1 Zone District under the 2016 Zoning Regulations). Therefore, the Applicant is requesting the requisite special exception approval as part of the request for the Modification of Consequence to the PUD.

As shown on the updated drawings attached hereto as Exhibit A, the proposed COW is located 37 feet, 4 inches from the nearest lot line.¹ Subtitle C 1313.8 requires that each part of an antenna or monopole be set back from each lot line the greater of 20 feet or a distance of at least 1/3 of the total constructed height. While the COW is located slightly less than 50 feet (1/3 of the total 150' height of the COW) from the nearest lot line, this nearest lot line is the southern border of the St Elizabeths hospital cemetery on which there are no inhabited buildings. In order to preserve a reasonable distance between the COW and the St. Elizabeths hospital buildings, the

¹ In the Initial Application, the Applicant indicated that the proposed COW location was over 300 feet from the nearest lot line.

COW cannot be located at a greater distance from the shared cemetery lot line. The COW's location will not interfere with the cemetery. The Applicant therefore requests that as part of the special exception approval, the Commission allow the COW to be located only 37'4" from the nearest lot line.

IV. Conclusion

As indicated above and in the Applicant's Initial Application, a Modification of Consequence to the PUD is appropriate in this case to allow a temporary COW on the campus of St. Elizabeths. The proposed COW will be temporary and is necessary to avoid loss of coverage to the surrounding area, including several government agencies, which will result from the demolition of the water tower on which the Applicant's antennas are currently located.

We would be happy to produce any other information or evidence in support of the above request and appreciate your consideration of this matter.

Sincerely,



John T. Epting

Initials

Enclosure

Certificate of Service

The undersigned hereby certifies that copies of the foregoing document will be sent by first class mail or hand-delivery to the following addresses on May 21, 2018.

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