

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

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<b>APPLICATION OF:</b> )	
)	
T-Mobile Northeast LLC )	BZA Case No.
)	
for a Special Exception Under 11-C DCMR § )	Hearing Date:
1313.2 to Install a Telecommunications )	
Facility in the RA-1 District at 3675 Ely Place, )	
S.E. (Square 5438, Lot 801) )	ANC 7F04
)	
)	
_____ )	

**APPLICANT’S PRE-HEARING STATEMENT**

**I. Introduction**

T-Mobile Northeast, LLC (“T-Mobile”) submits this statement through undersigned counsel in support of its application for a special exception to install a telecommunications facility at 3675 Ely Place, S.E., (Square 5438, Lot 801) in the RA-1 district. This application is made pursuant to 11-C DCMR § 1313.2 of the Zoning Regulations. 11-C DCMR § 1313.2 permits monopoles in the RA-1 zone as special exception uses.

**II. Jurisdiction of the Board**

The Board of Zoning Adjustment (“Board” or “BZA”) has jurisdiction to grant the requested special exception pursuant to D.C. Official Code § 6-641.07(g)(2) (2012 Repl.) and 11-X DCMR § 901.2.

**III. Background and Description of Proposal**

T-Mobile is a Federal Communications Commission (“FCC”) licensed provider of wireless Personal Communication Services (“PCS”) throughout the Washington, D.C. metropolitan area.

T-Mobile is seeking to develop and improve its wireless services in Washington DC and the proposed facility is a necessary component of T-Mobile's network.

The objective of this site is to provide in building coverage and capacity in this commercial and residential area. This site will handle traffic from the commuters and will also provide contiguous coverage between existing sites. This site will also enhance in-building coverage in the surrounding areas and communities. The proposed location for the facility will allow T-Mobile to effectively and efficiently improve emergency and non-emergency wireless services to those who live, work or travel through this portion of Washington, D.C.

When T-Mobile has a need for coverage, it first seeks to co-locate antennas onto or within an existing structure. There were no existing structures within the area surrounding the proposed site that would allow T-Mobile to co-locate antennas in such a way as to meet its coverage objectives.

The height of 81'6" is the minimum height required to achieve the necessary coverage. Each site that T-Mobile constructs is designed specific to the location and needs of the community. Prior to submitting Special Exception Application, T-Mobile conducts propagation tests. Propagation tests use software to predict height and coverage needs based on information like topography, tree cover, proximity to existing sites, etc. This radio frequency propagation information is evaluated and analyzed, along with other technical data to predict how much coverage will be provided at various proposed heights. T-Mobile's engineers evaluate this data and, in the case of the proposed monopole, the result of the tests showed that a 81'6" facility would be required to provide the needed amount of coverage.

As shown in the zoning drawings dated and prepared by , T-Mobile proposes to replace one of the existing light poles on the western side of the batting cages with an 81'6" monopole.

T-Mobile will install its equipment in the 10' x 20' compound on the northern side of the batting cages. T-Mobile will install its antennas at a centerline height of 81' and the stadium lights will be mounted at 71'6".

**IV. The Applicant Meets the Standard for Special Exception Relief**

**A. Standard of Review**

Section 1313.2 of the Zoning Regulations allows monopoles in the RA-1 zone.

**B. Compliance with Special Exception Standards under Subtitle X § 901.2**

1. The Special Exception Will Be in Harmony with the General Purpose and Intent of the Zoning Regulations and Maps.

This property is home to the Washington Nationals Youth Baseball Academy. Fort Dupont Ice Arena is located to the east, with Fort Circle Park to the south, Kimball Elementary School to the west and Sousa Middle School to the north. The special exception request to install a replacement light pole/ monopole will be in harmony with the general purpose and intent of the Zoning Regulations and Map to promote the public health, safety, morals, convenience, order, prosperity and general welfare. 11-A DCMR § 101.1. The facility is designed to blend with the existing light poles on the fields and this telecommunications use will not change or interfere with existing light and air. Because the facility is completely unmanned and merely requires only 1-2 maintenance personnel visits per month, this use will not allow undue concentration of population and the overcrowding of land. It also will not result in an uneven distribution of population, business and industry and use of land. *See* 11-A DCMR § 101.1. There will be no increase in traffic as a result of the monopole's installation.

2. The Special Exception Will Not Tend to Adversely Affect the Use of Neighboring Property in accordance with the Zoning Regulations and Maps.

The monopole will not tend to adversely affect the use of neighboring property. 11-A DCMR § 101.1. It will be one of several tall light pole structures on the parcel.

The telecommunications use will not create any adverse effects with respect noise, trash removal, deliveries or hours of operation. The facility will work in conjunction with other T-Mobile wireless service facilities in the area to provide more robust coverage in this area of the District.

**V. Community Outreach**

Pursuant to Subtitle Y § 300.8(l), the Applicant will present the proposal to Advisory Neighborhood Commission (“ANC”) 7F.

**VI. Conclusion**

For the reasons stated above, the proposed application meets the standards for special exception relief under the Zoning Regulations. The Applicant therefore respectfully requests that the Board grant the application.

Respectfully submitted,

By: 

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