



Executive Director's Recommendation

Commission Meeting: March 7, 2019

PROJECT United States Department of Labor, Frances E. Perkins, Sprint Telecommunications Facility Upgrades 200 Constitution Avenue NW Washington, DC	NCPC FILE NUMBER 8048
SUBMITTED BY U.S. General Services Administration	NCPC MAP FILE NUMBERS 21.00(38.30)44880
REVIEW AUTHORITY Federal Projects in the District per 40 U.S.C. § 8722(b)(1) and (d)	APPLICANT'S REQUEST Approve preliminary and final building plans
	PROPOSED ACTION Approval of preliminary and final building plans with comments
	ACTION ITEM TYPE Consent Calendar

PROJECT SUMMARY

On behalf of Sprint, GSA has submitted a proposal to modify Sprint's telecommunications facility at the United States Department of Labor Building, known as the Frances E. Perkins Building. Sprint currently operates six panel antennas in three sectors, all in a central location on the upper rooftop of the federal building. The proposed modification would relocate one sector (Sector 1: one panel antenna and installing one new combined antenna/Remote Radio Head replacement unit) to the northside of the building (facing D Street NW), establish a new antenna sector (Sector 4: one panel antenna and installing one new combined antenna/RRH replacement unit) on the southside of the building, and replace two existing panel antennas (existing Sectors 2 and 3) with two smaller combined antenna/RRH units. Existing mounts will be used to install replacement antennas in Sectors 2 and 3, and new antenna locations (Sectors 1 and 4) will require new mounts. The proposed changes will help to meet coverage and capacity objectives for the immediate area as part of its network.

KEY INFORMATION

- There are multiple telecommunications providers – AT&T, T-Mobile, Verizon – that currently operate antennas on the rooftop of the Frances E. Perkins Building, in some cases, near the Sprint installations.
- GSA provided photo-simulations demonstrating views of the proposed and existing rooftop antennas from different vantage points around each building.
- The antenna modifications are proposed to maintain adequate cell coverage in response to nearby planned development from the Capitol Crossing project.
- Radio Frequency (RF) analysis reports for the proposals conclude that each planned modification will operate within all applicable Federal Communications Commission (FCC) and Occupational Safety and Health Administration (OSHA) guidelines.

RECOMMENDATION

The Commission:

Approves the preliminary and final building plans for the Sprint telecommunications facility modification on the upper rooftop of the United States Department of Labor – Frances E. Perkins Building, located on downtown Washington, DC.

Notes that this project will expand cellular service in the vicinity of the building with one new antenna sector on the southside of the building, consisting of two antennas, and a relocated sector on the northside of the building with two antennas.

Requires GSA and Sprint to work with NCPC staff to finalize color selections for its new and existing antenna equipment, prior to installation, to best minimize visual impacts from surrounding perspectives.

Notes that NCPC staff is working with GSA to study antenna planning policies and concealment strategies within the context of downtown Washington, DC, with potential revised antenna policies planned for review by NCPC in the fall 2019.

PROJECT REVIEW TIMELINE

Previous actions	None
Remaining actions (anticipated)	None

PROJECT ANALYSIS

Executive Summary

After review of the project submittal, based on the scope of the project and required antenna painting to help conceal their appearance, staff recommends that the Commission **approve the preliminary and final building plans for the Sprint telecommunications facility modification on the upper rooftop of the United States Department of Labor – Frances E. Perkins Building, located on downtown Washington, DC.**

Analysis

The General Services Administration submitted a proposal to modify its existing telecommunications facility on the rooftop of the United States Department of Labor Building,

which consists of three antenna sectors (known as Sectors 1-3), each with two panel antennas. Sector 1 will be relocated to the northside of the upper building rooftop, affixed to the northside façade (facing D Street NW), consisting of two antennas (one existing antenna and one new smaller replacement antenna with an RRH unit.) Sectors 2 and 3 will remain installed on the existing rooftop sled, behind a concealment box, with two new combined replacement antenna/RRH units. A new sector (Sector 4) will be installed on the southside of the upper building façade (facing Constitution Avenue NE and the US Capitol Building), with two new antennas (one panel and one combined antenna/RRH unit.) All ancillary support equipment for the antennas will be situated further back on the rooftop to eliminate their visibility from the street-level. The proposed new additional antenna sector (southside of the building) and relocated sector (northside of the building) will expand cellular coverage within the vicinity of the Department of Labor Building. Therefore, staff recommends that the Commission **note that this project will expand cellular service in the vicinity of the building with one new antenna sector on the southside of the building, consisting of two antennas, and a relocated sector on the northside of the building with two antennas.**

Graphics are provided on the following pages to show existing and future simulated conditions after each antenna sector change. Staff notes that some antennas may be visible from the ground under proposed color schemes, so GSA and NCPC staff should work with Sprint to select colors that will best minimize views from nearby surrounding perspectives. Therefore, staff recommends that the Commission **require GSA and Sprint to work with NCPC staff to finalize color selections for its new and existing antenna equipment, prior to installation, to best minimize visual impacts from surrounding perspectives.**

With the proliferation of telecommunication equipment on building rooftops since the 1990's, some of which, are not reflected in NCPC records, NCPC antenna policies should be revisited to ensure their continued relevance. GSA staff is currently undertaking an effort to better understand modern concealment strategies for rooftop-mounted antennas and how to effectively meet the needs of the telecommunications industry while protecting downtown Washington's historic and culturally-significant setting. NCPC staff is currently coordinating with GSA in this effort, with potential revised antenna policies planned for review by NCPC in the fall 2019. Therefore, staff recommends that the Commission **note that NCPC staff is working with GSA to study antenna planning policies and concealment strategies within the context of downtown Washington, DC, with potential revised antenna policies planned for review by NCPC in the fall 2019.**

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The proposed antenna modifications comply with policies from the Comprehensive Plan for the National Capital. The policies pertain to the following antenna-specific issues:

- Considering joint-use of antennas and co-locating antennas to reduce aesthetic impacts and limit the area of radiofrequency exposure.

- Following a practice of “prudent avoidance” of radio-frequency exposure.
- Requiring adequate communication of potential risks where occupational/controlled exposure may be present.
- Minimizing visual impacts of telecommunication antennas proposed for building rooftops.

As part of the submission, GSA included a radio-frequency safety report and Categorical Exclusion documentation that find that the project will comply with relevant operational and safety requirements as mandated by the Federal Communications Commission (FCC) and Occupational Safety and Health Administration (OSHA).

National Historic Preservation Act

GSA has determined that no further review of the project proposal is required under Section 106 of the National Historic Preservation Act. The DC State Historic Preservation Office submitted a letter dated December 31, 2018 determining that the project will have no adverse effect on historic properties. Due to its review authority over the project, NCPC has an independent obligation to carry out the requirements of Section 106 of the NHPA for the antenna modification proposal. NCPC has elected to designate GSA as lead agency pursuant to 36 CFR § 800.2(a)(2) to satisfy the Commission’s Section 106 responsibility related to the proposal.

National Environmental Policy Act

Pursuant to regulations implementing the National Environmental Policy Act, the General Services Administration concluded that the project proposal qualifies for a categorical exclusion based on GSA environmental review standards. Due to its review authority over the project, NCPC has an independent obligation to carry out the requirements of NEPA for the project. Staff finds that the project is in conformance with NCPC Categorical Exclusion requirements under § 601.12 (a)(5) of the Commission’s National Environmental Policy Act Regulation. Staff examination finds the proposed antennas, with their location, design, and completed RF review, all adhere to the Commission’s exclusion requirements.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its meeting on February 13, 2019 and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. Participating agencies were NCPC; the District of Columbia Office of Planning; the District of Columbia State and Historic Preservation Office; the General Services Administration; the District Department of Transportation; the District Department of the Environment; the National Park Service; and the Washington Metropolitan Area Transit Authority.

ONLINE REFERENCE

The following supporting documents for each project submission are available online at www.ncpc.gov:

- Submission Package

Prepared by Michael Weil
2/28/2019

POWERPOINT (ATTACHED)

United States Department of Labor Building Telecommunications Facility Upgrades

200 Constitution Avenue, NW
Washington, DC

Preliminary and Final Building Plans

United States General Services Administration

Project Summary

Commission Meeting Date: March 7, 2019

NCPC Review Authority: Federal projects within the District of Columbia - 40 U.S.C. § 8722(b)(1) and (d))

Applicant Request: Approval of Preliminary and Final Building Plans

Session: Consent Calendar

NCPC Review Officer: M. Weil

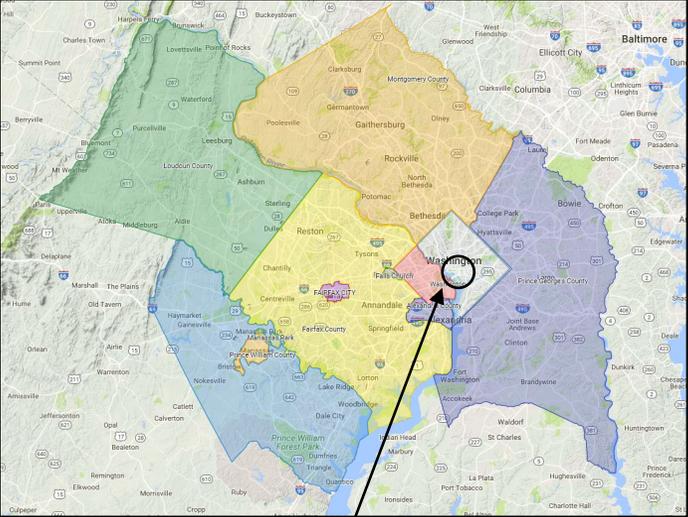
NCPC File Number: 8048

Project Summary:

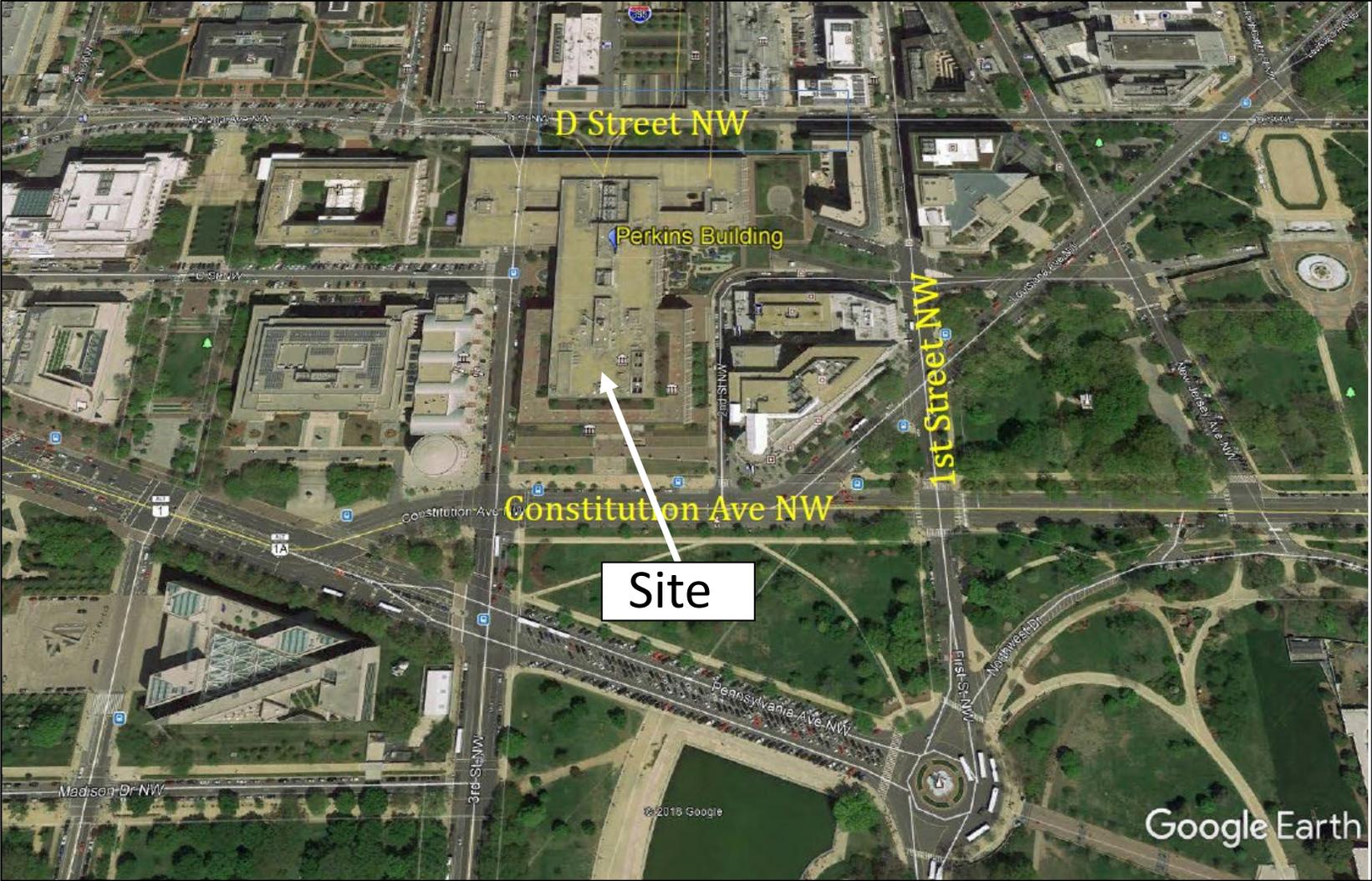
The building rooftop currently has three antenna sectors, each with two antennas and two Remote Radio Heads (RRHs). The antennas and RRHs are mounted on the upper machine room. All three sectors are grouped at a single location and are mounted on a triangular sled that is located on the upper mechanical room and is shielded by an enclosure referred to as a stealth enclosure. The equipment cabinet that supports the installation is centrally located on the lower roof and is not visible from the ground.

Proposed Changes: The proposed modifications include creation of two new mounting locations. Sector one will relocate to the north end of the roof and a fourth sector will be established at the southern end of the roof, facing Pennsylvania Avenue. The relocated sector (Sector one) will contain two antennas and one RRH, and be set against the face of the building utilizing a weighted sled. Sector four (new location) will consist of two antennas and three RRHs. This equipment will be placed against the face of the upper mechanical room and utilize a cantilevered mounting system to avoid attachments to the face of the wall. Sectors two and three (both existing) will each have one antenna replaced and one RRH removed. Some photo simulations include images of the proposed antennas and a simulation using stealth enclosures.

Project Location



Site



Project Location

VIEWSHEDS | Public Realm and Significant Vistas



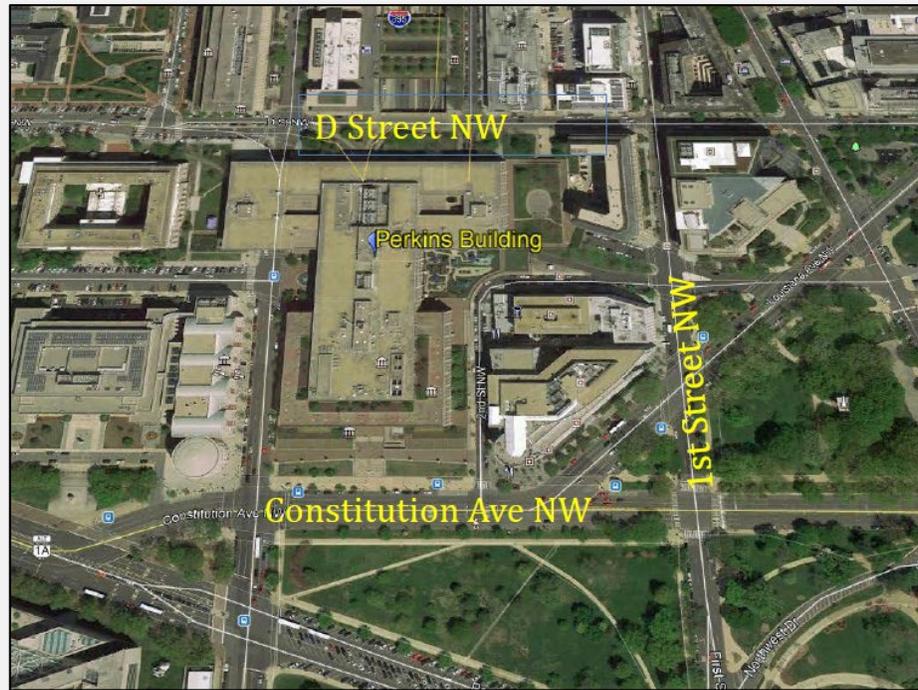
L'ENFANT CITY



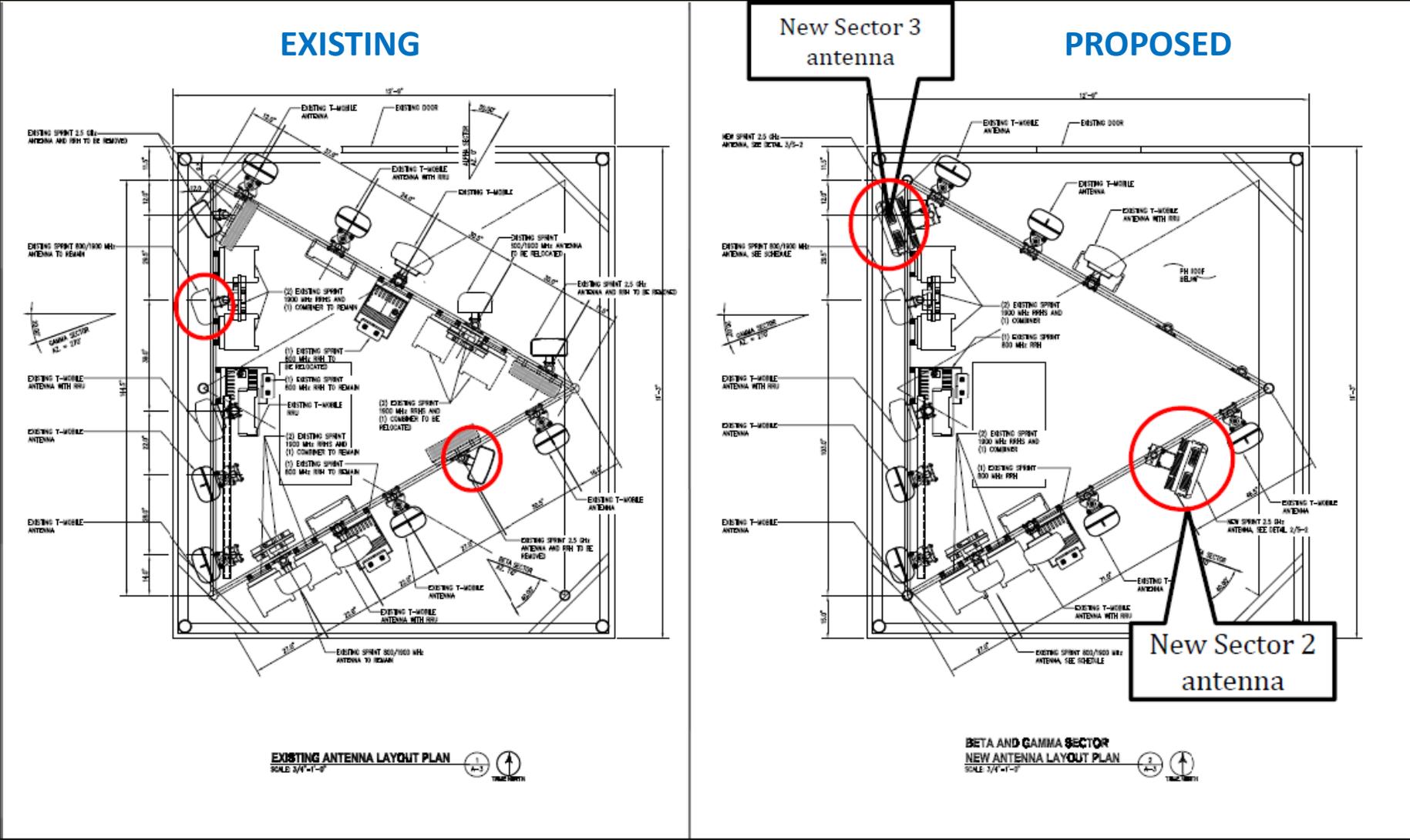
STREET WITH
SIGNIFICANT
TERMINATING
VISTAS

PARK + OPEN SPACE SYSTEM

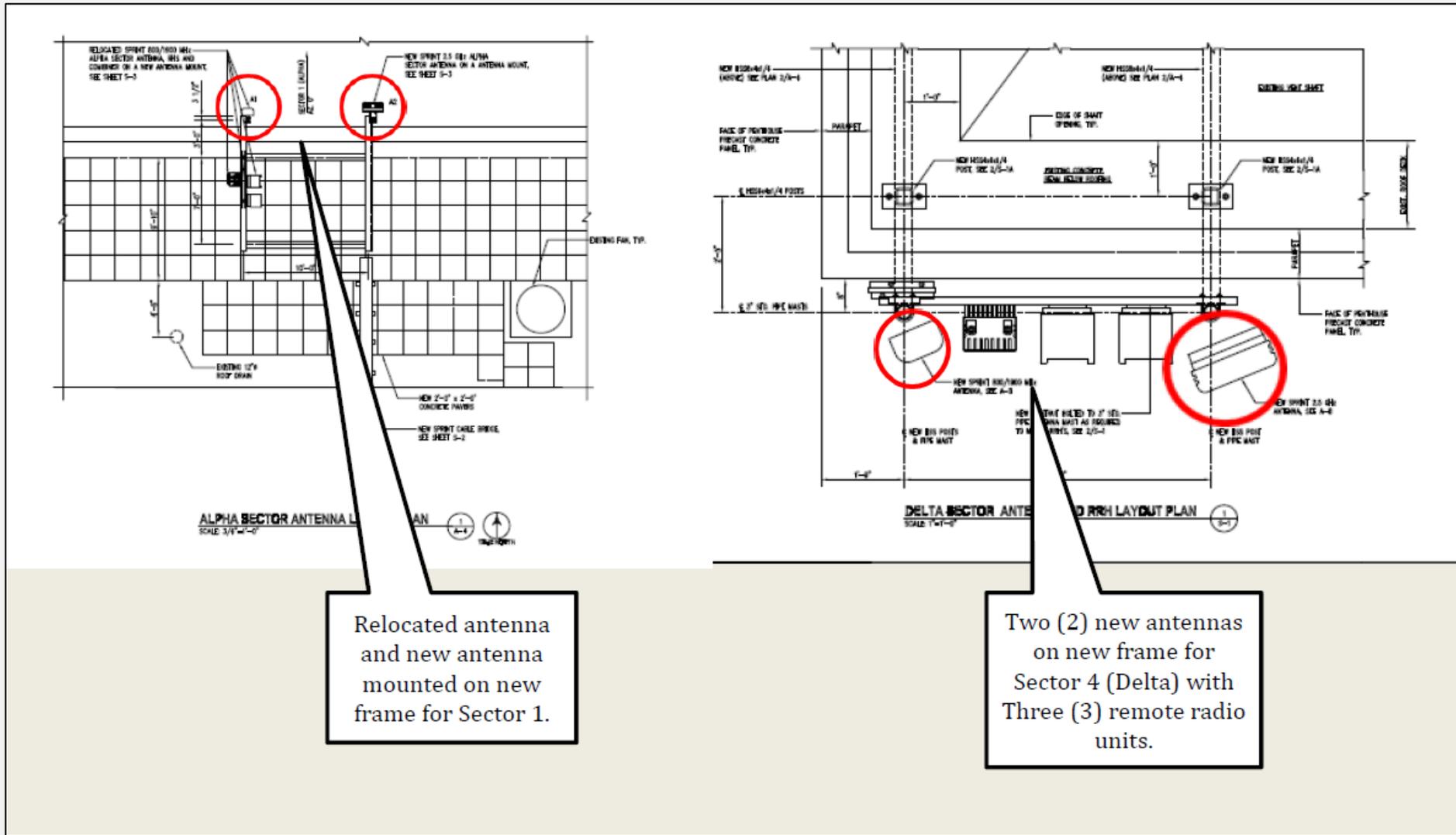
WATER



Antenna Sectors 2 & 3 Closeup



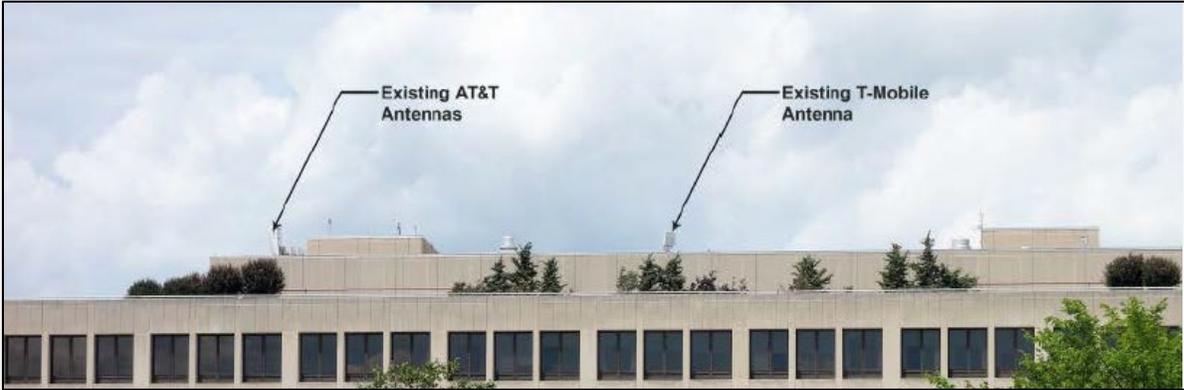
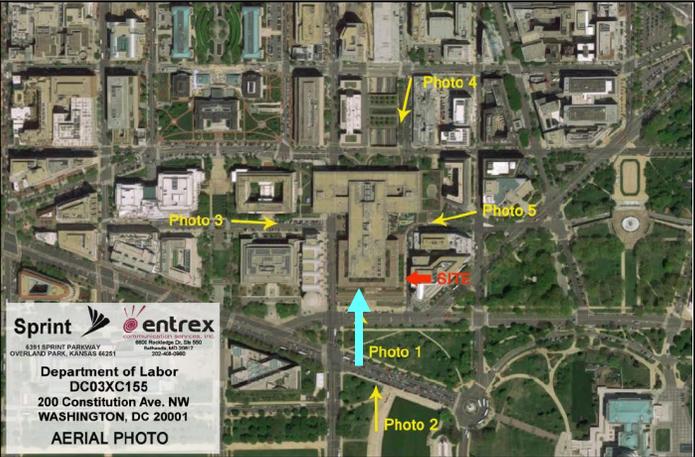
New Antenna Sectors 1 & 4 Closeup



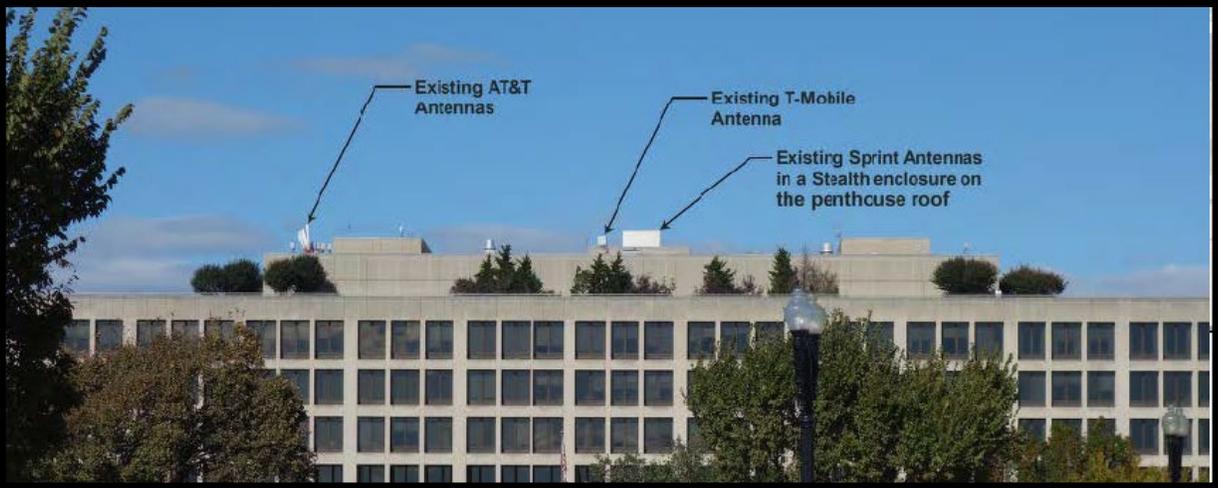
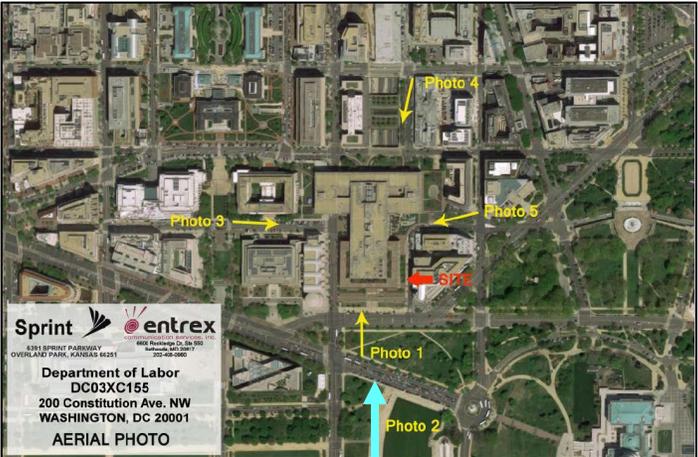
Visual Study



Visual Study – (Photo 1)



Visual Study – (Photo 2)



Visual Study – (Photo 3)

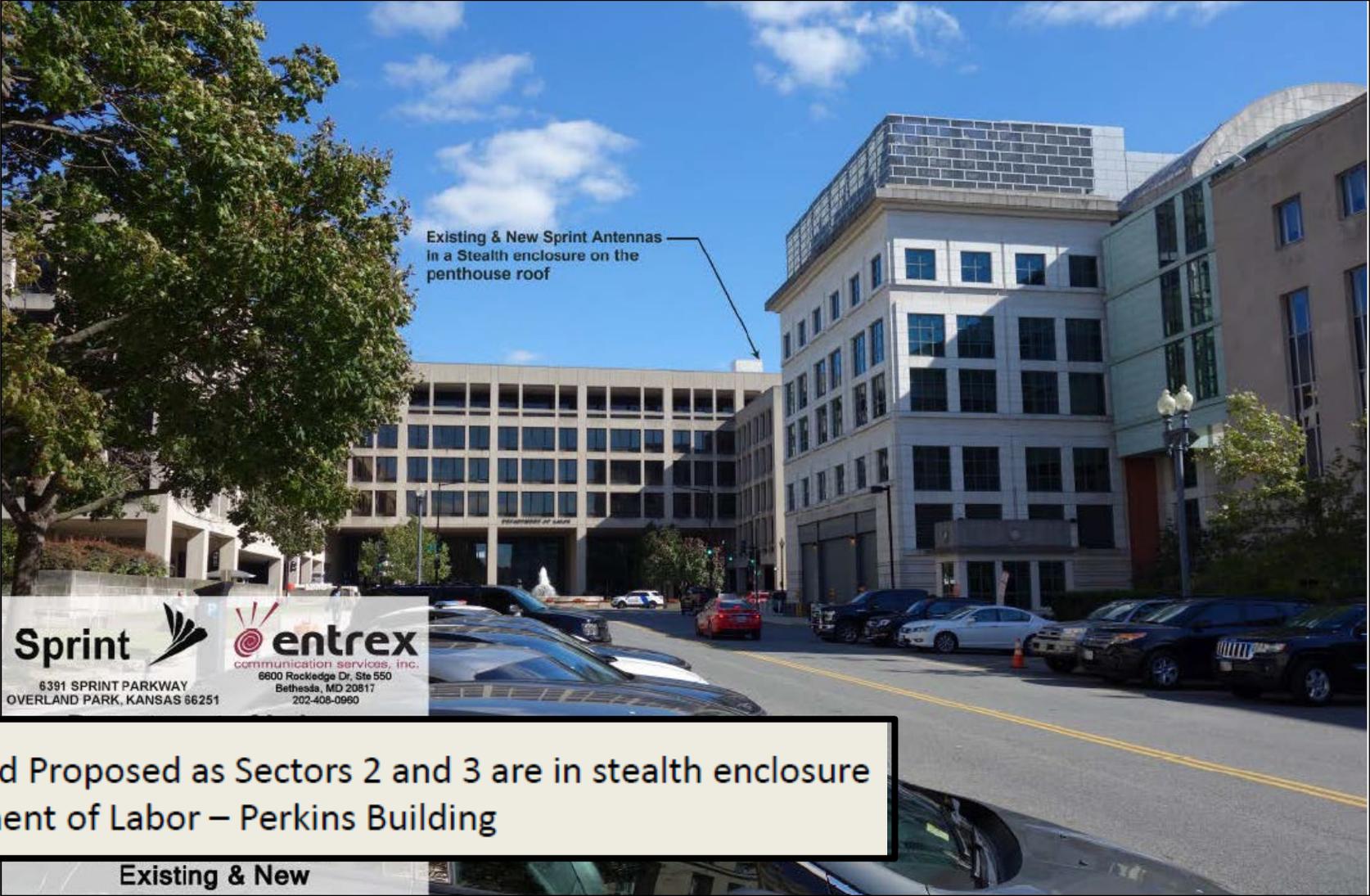
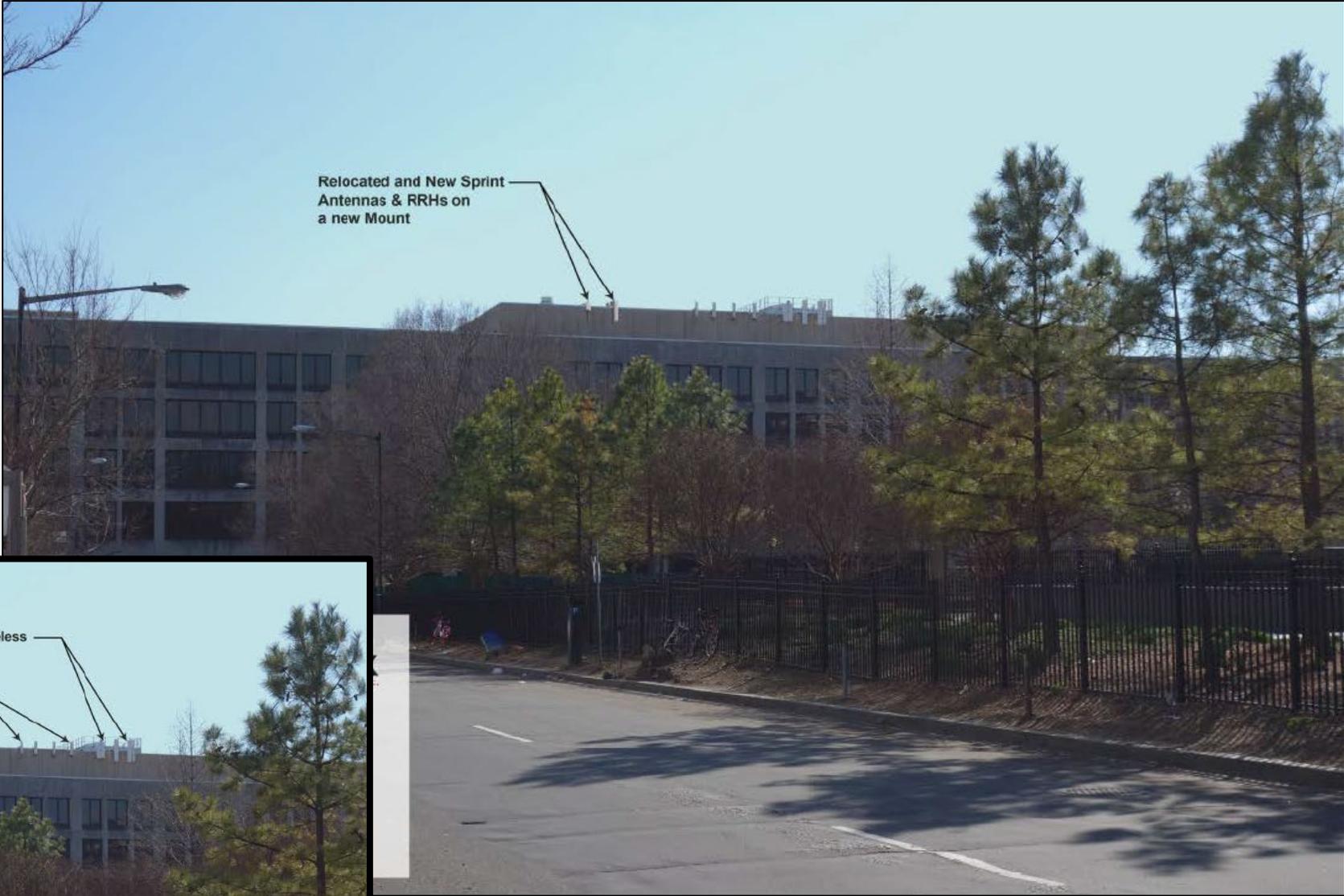


Photo of West View Existing and Proposed as Sectors 2 and 3 are in stealth enclosure
Department of Labor – Perkins Building

Existing & New

Visual Study – (Photo 4)



Visual Study - (Photo 5)

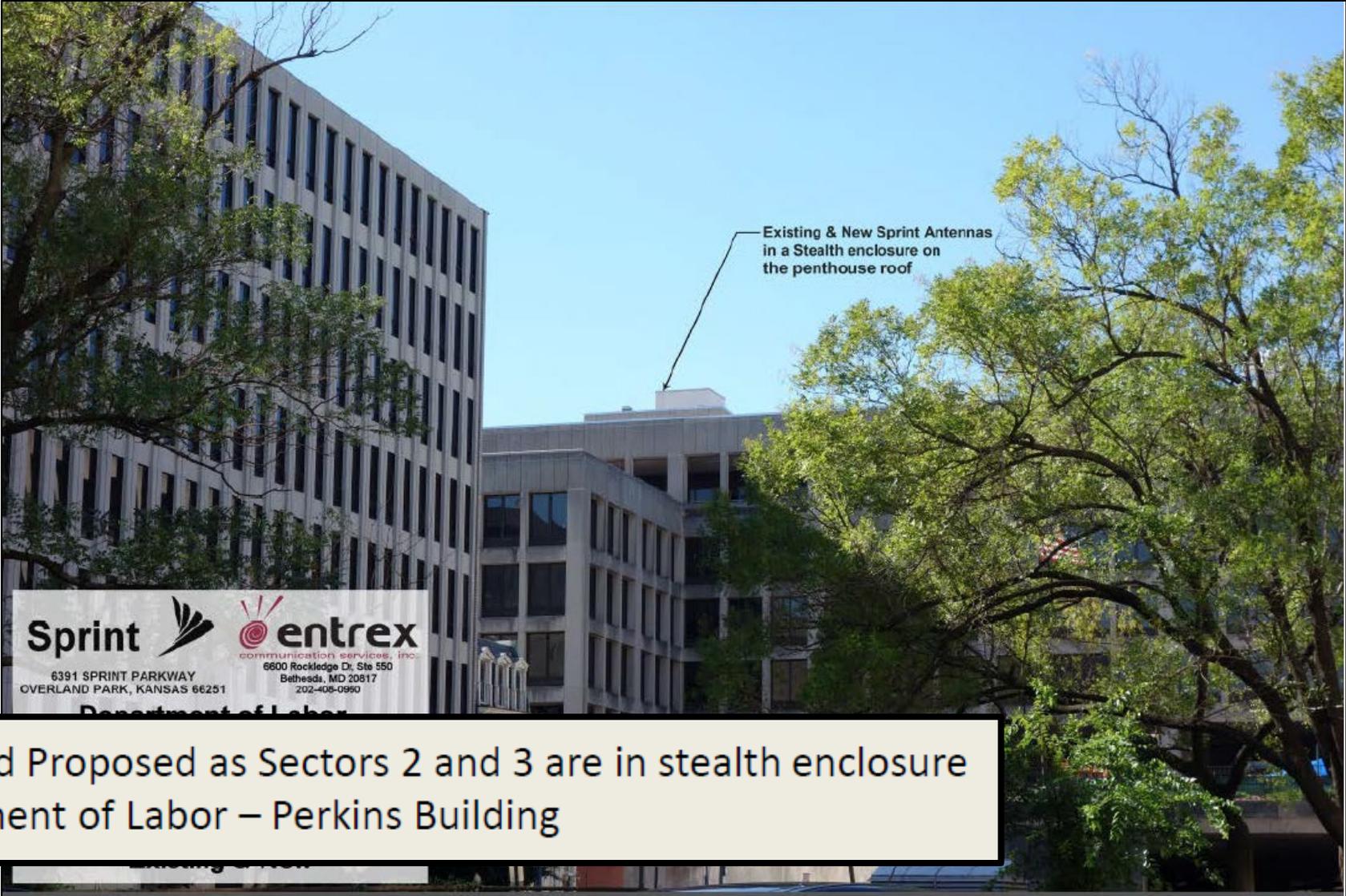
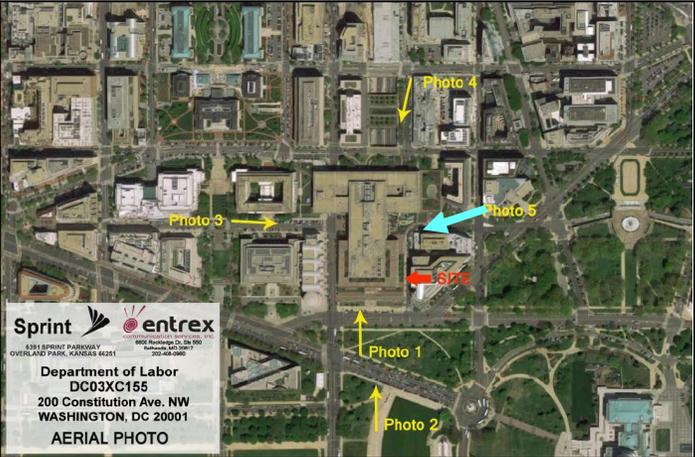
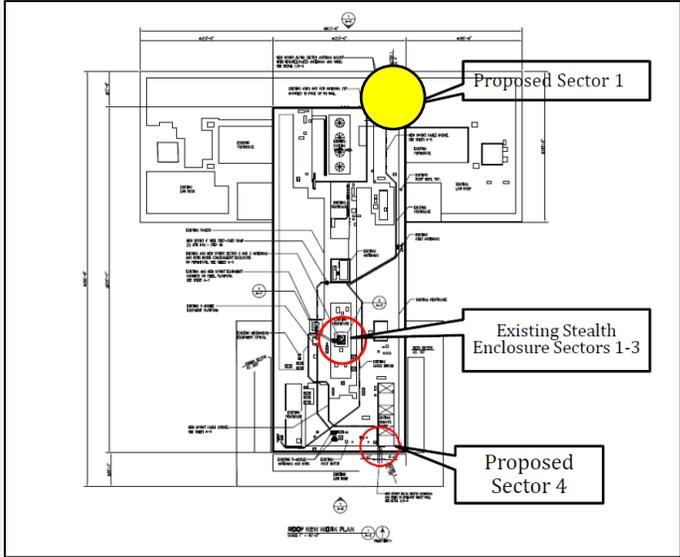
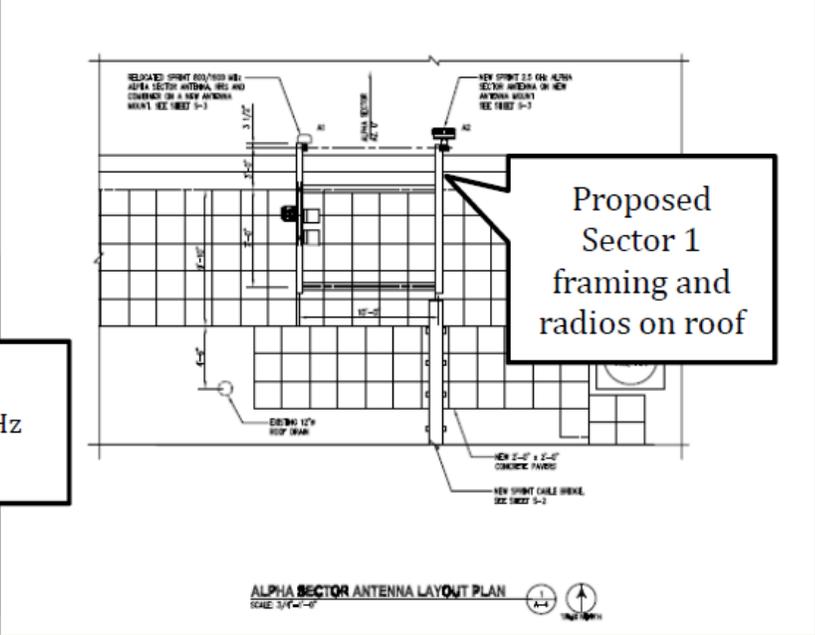
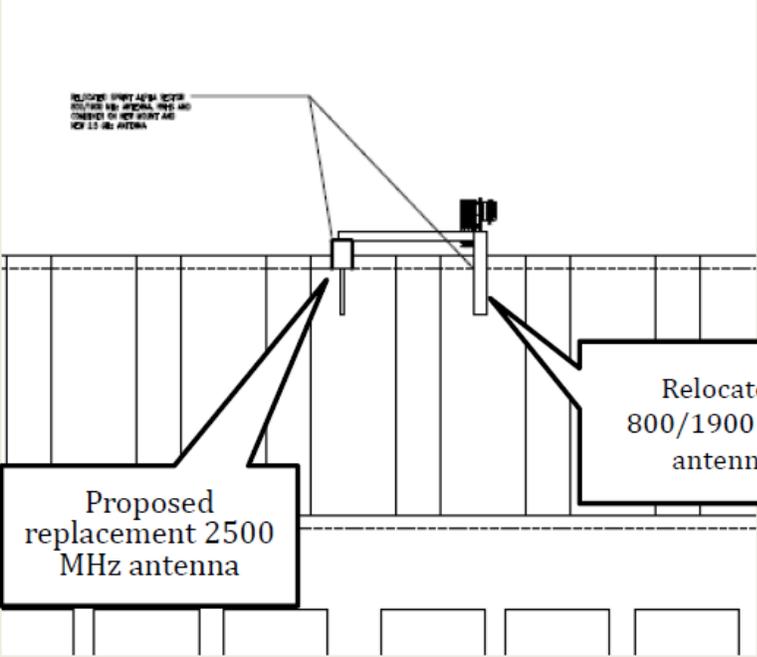


Photo of East View Existing and Proposed as Sectors 2 and 3 are in stealth enclosure
Department of Labor – Perkins Building

Antenna Details



Sector Location New Proposed Sectors 1 (Alpha) Detail – Department of Labor- Perkins Building



Antenna Details

Sector Location New Proposed Sectors 4 (Delta) Detail – Department of Labor- Perkins Building

