



## Executive Director's Recommendation

Commission Meeting: November 7, 2019

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<b>PROJECT</b> <b>AT&amp;T Antenna Relocation</b> Liberty Loan Building 401 14th Street, SW Washington, DC	<b>NCPC FILE NUMBER</b> 8114
	<b>NCPC MAP FILE NUMBER</b> 1.74(38.30)45012
<b>SUBMITTED BY</b> United States General Services Administration	<b>APPLICANT'S REQUEST</b> Approval of preliminary and final site development plans
<b>REVIEW AUTHORITY</b> Federal Projects in the District per 40 U.S.C. § 8722(b)(1) and (d)	<b>PROPOSED ACTION</b> Approve preliminary and final site development plans
	<b>ACTION ITEM TYPE</b> Consent Calendar

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### PROJECT SUMMARY

In July 2016, the U.S. General Services Administration (GSA) submitted project documents for the installation of 12 antennas at the Liberty Loan Building. At that time, the submission called for the installation of four antennas at three separate locations on the roof of the building. Subsequent to this approval, GSA learned that the carrier altered the four antennas mounted to the parapet wall on the building's west façade by replacing them with larger antennas. These new antennas were not compliant with the terms of the 2016 approval. The 2016 approval allowed these four antennas to be mounted above the cornice line, however they were not to extend above the top of the parapet wall, a height of approximately three feet. At some point following the initial installation, the carrier replaced the smaller antennas with larger ones to meet the technical requirements of the coverage area. The larger antennas extended well above the parapet wall and are out of compliance with the Commission approval.

GSA now proposes placing the four large antennas on a weighted sled which will be within a rooftop enclosure. The enclosure would be centered above the west façade of the north wing and set back five feet from the parapet wall. Since the parapet wall is three feet high and the combined height of the sled and antenna is eight feet, there will only be five feet of the enclosure above the parapet wall height. The enclosure is constructed of a lightweight material that allows for the passage of radio waves and would match the building's existing rooftop mechanical rooms in height, color and detailing. GSA stated this alternative would be no more visible from West Potomac Park than the antenna parapet location approved in 2016. The enclosure will be easy to remove when it is no longer needed.

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## KEY INFORMATION

- The Commission approved 12 AT&T antennas on the building roof in July 2016.
- Along the western façade, four of the existing 12 antennas were replaced with larger antennas without review and approval.
- GSA now seeks to relocate the four antennas to a less visible area on the roof and enclose them.
- The Liberty Loan Building is 70 feet in height, with a three-foot parapet.

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## RECOMMENDATION

**Approves** the preliminary and final site development plans for the relocation of four AT&T antennas on the roof of the Liberty Loan Building in southwest Washington, DC.

**Commends** GSA for its review of their antenna program, and attention to design and review compliance.

## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	<b>July 2016</b> – approval of preliminary and final sited development plans
<b>Remaining actions (anticipated)</b>	– none

## PROJECT ANALYSIS

### Executive Summary

GSA submitted a proposal for relocating four rooftop antennas that the Commission approved in July 2016. Following the 2016 approval the cellular service provider replaced the existing small antennas with larger more visible antennas on the parapet without approval. GSA is requiring the service provider to relocate these four antennas on the roof and place them within an enclosure to screen them from view. Staff appreciates GSA diligence regarding these antennas and supports the relocation on the roof of the Liberty Loan Building. Therefore, staff recommends that the Commission **approve the preliminary and final site development plans for the relocation of four AT&T antennas on the roof of the Liberty Loan Building in southwest Washington, DC and commend GSA for its review of their antenna program, and attention to design and review compliance.**

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## **Analysis**

GSA submitted this proposal to correct a situation regarding an unapproved replacement of an existing set of rooftop antennas. The new location for these four antennas will be on an enclosed utility sled on the roof of the Liberty Loan Building, five feet from the westernmost edge of the roof. Since there is a three-foot parapet at the edge of roof and the proposed enclosure will be eight feet tall and set back from the building edge by five feet, GSA states that it will not be visible from the street as the parapet will block the view. Staff has reviewed the photo-simulations, submitted by GSA, of the antennas on the roof and find that they are minimally visible. Under the Height of Buildings Act of 1910 all penthouses and rooftop structures above the allowed height need to be set back at a 1 to 1 ratio. Staff notes that the Liberty Loan Building is located on 14<sup>th</sup> Street, NW, a 110-foot right-of-way which would allow a building 130 feet in height. Since the Liberty Loan Building is 70 feet tall and is below the allowed height under the Height Act, it does not require rooftop structures to be setback at a 1 to 1 ratio.

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

### **Comprehensive Plan for the National Capital**

Staff finds that this project is consistent with the relevant policies contained within the Urban Design Elements of the Comprehensive Plan particularly those pertaining to the placement of rooftop antennas on federal buildings.

### **National Historic Preservation Act**

GSA has a responsibility for the project under Section 106 of the National Historic Preservation Act. GSA determined that the proposed installation of the four rooftop antennas will no adverse effect on the historic Liberty Loan building or adjacent historic resources. The DC State Historic Preservation Office concurred with this finding on September 4, 2019 "...provided that the installation is pushed as far back from the roof edge as possible and the enclosure is tinted to match the color of the existing building." GSA has moved the antenna sled back to 5 feet from the building edge and the enclosure matches the exterior building color.

Due to its review authority over the project, NCPC has an independent obligation to carry out the requirements of Section 106 of the NHPA. 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.

### **National Environmental Policy Act**

Pursuant to the regulations implementing the National Environmental Policy Act, GSA submitted a conclusion that the project is a categorical exclusion based on GSA's environmental review standards. Due to its review authority over the project, NCPC has an independent obligation to

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carry out the requirements of NEPA. Staff finds that this project is in conformance with the 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, adhere to the Commission's exclusion requirements.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its October 16, 2019 meeting. The Committee forwarded the preliminary and final design to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC, the DC SHPO (via email); the District Department of Transportation, the District Department of Energy and the Environment, the DC Office of Planning, the National Park Service; the General Services Administration and the Washington Metropolitan Area Transit Authority.

### **U.S. Commission of Fine Arts**

The Commission of Fine Arts reviewed and approved this project placed on their consent agenda at its October 17, 2019 meeting.

## **ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package

Prepared by Carlton Hart  
10/31/2019

## **POWERPOINT (ATTACHED)**

# AT&T Antenna Relocation at the Liberty Loan Building

401 14th Street, SW, Washington DC

Approval of Preliminary and Final Site Development Plans

United States General Services Administration

# Project Summary

**Commission Meeting Date:** November 7, 2019

**NCPC Review Authority:** 40 U.S.C. § 8722(b)(1) and (d)

**Applicant Request:** Approval of Preliminary and Final Site Development Plans

**Session:** Consent Calendar

**NCPC Review Officer:** Carlton Hart

**NCPC File Number:** 8114

## Project Summary:

In July 2016 the U.S General Services Administration (GSA) submitted project documents for the installation of 12 antennas at the Liberty Loan Building. The submission called for the installation of four antennas at three separate locations for a total of 12. It has come to GSA's attention that the antennas mounted to the parapet wall on the building's west façade have been altered by the carrier and are no longer compliant with the terms of the 2016 approval.

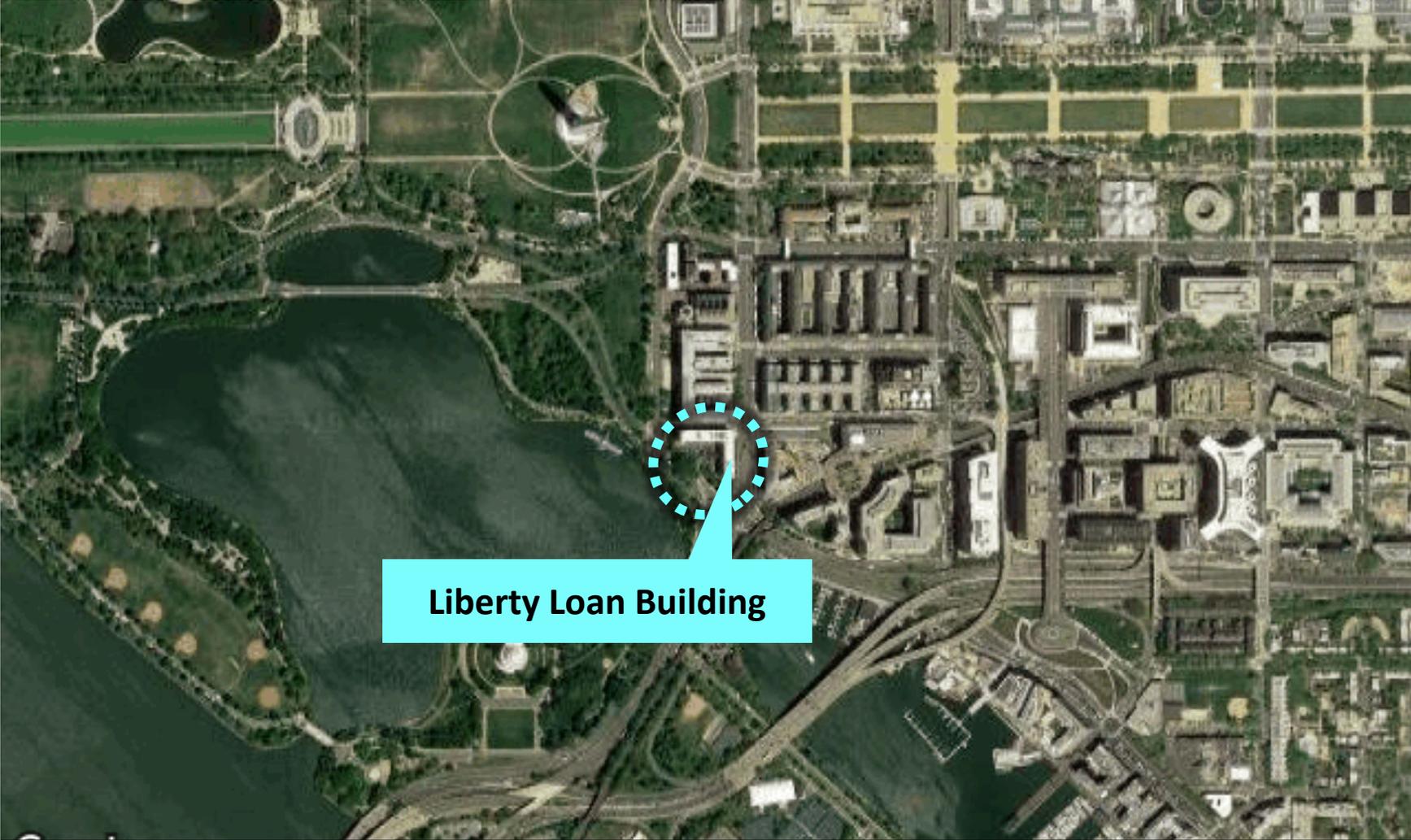
The 2016 submission called for the installation of four antennas to be mounted on the parapet wall facing West Potomac Park. The antennas were to be mounted above the cornice line and were not to extend above the top of the parapet wall, a distance of approximately 36 inches. At some point following the initial installation the carrier installed a larger antenna to meet the technical requirements of the coverage area. The larger antennas extended well above the parapet wall.

In discussions with AT&T, GSA stated the need to remove the current antennas and install the units agreed to during the consultation and approved by the National Capital Planning Commission and the U.S. Commission of Fine Arts. The carrier's representative explained that the smaller antennas originally specified no longer meet their requirements and he proposed instead relocating the larger antennas to the roof. GSA staff met with the representative on the rooftop to inspect alternative locations.

# Project Summary

GSA proposes placing the four antennas on a weighted sled within a rooftop enclosure. The enclosure would be centered above the west façade of the north wing and set back five feet from the parapet wall for a 1:1 height to setback ratio. The parapet wall is three feet high and the combined height of the sled and antenna is eight feet, placing the height of the enclosure five feet above the parapet wall. The enclosure is constructed of a lightweight material that allows for the passage of radio waves and would match the building's existing roof top mechanical rooms in height, color and detailing. GSA stated this alternative would be no more visible from West Potomac Park than the antenna parapet location reviewed by your office in 2016. The enclosure will be easily reversible when no longer needed.

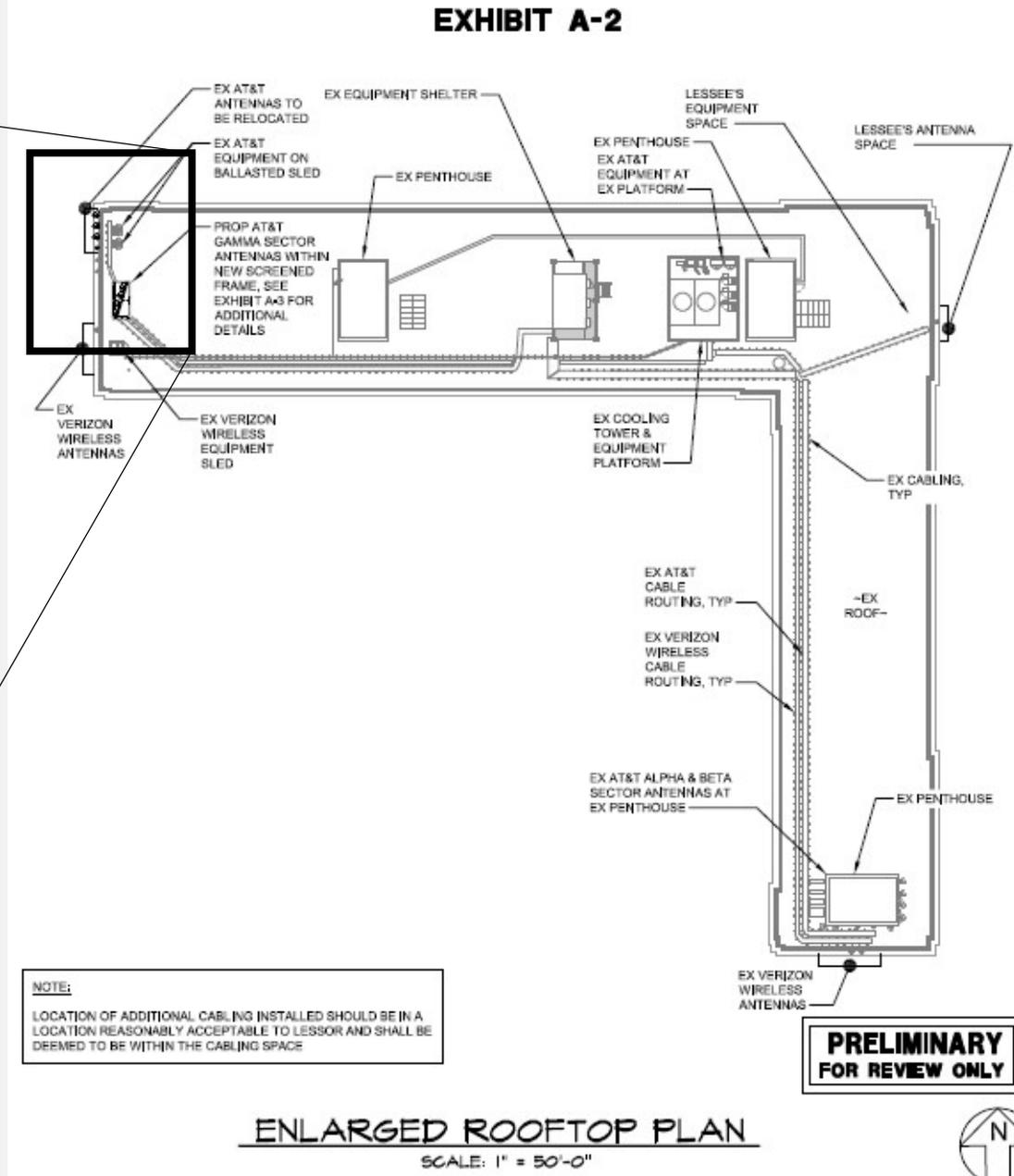
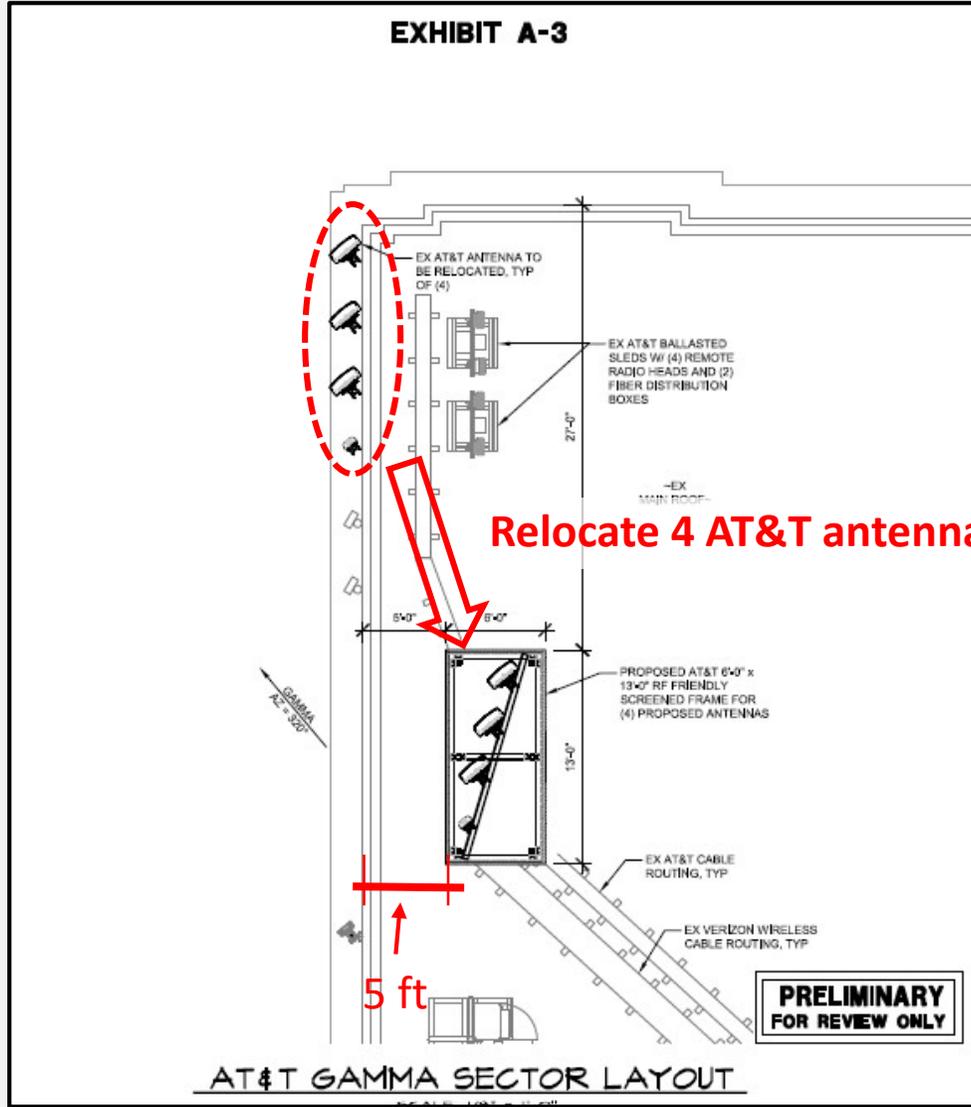
# Site Location



**Liberty Loan Building**

Location Map

# Rooftop Plans



# View – looking east



Existing Condition



Proposed

# View – looking southeast

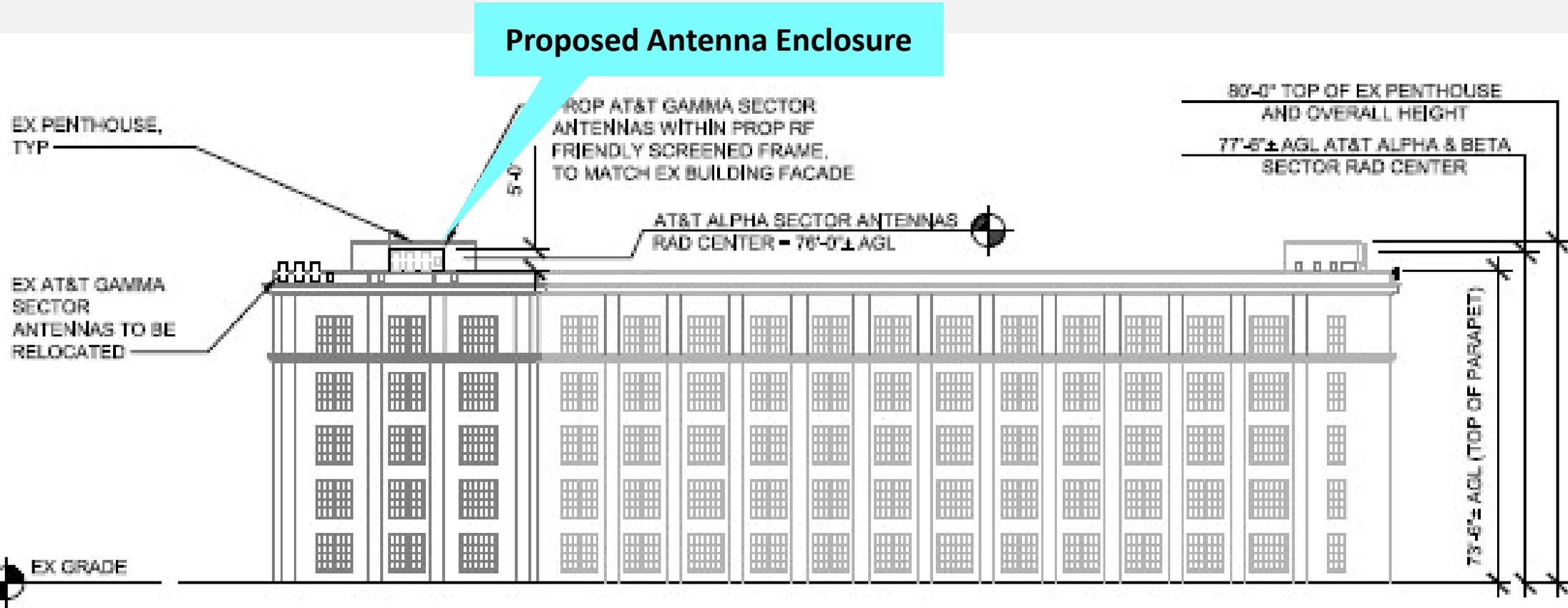


Existing Condition



Proposed

# West Façade Elevation



**EXHIBIT A-4**