



# How does the D.C. Historic Preservation Office review cellular telephone antenna installations?

The Historic Preservation Office (HPO) reviews cell phone installations under two authorities:

- As the State Historic Preservation Office (SHPO) with responsibility for Section 106 review under federal law; and
- As the staff to the Historic Preservation Review Board (HPRB), with responsibility for reviewing building permit applications under the D.C. historic preservation law.

### **Review Process**

The HPO goal is to streamline the review of cell phone installations by coordinating the reviews under federal and local law. When reviewing a submission under either process, the SHPO reviewer may also identify concerns that may arise in the other. For example, when reviewing a Section 106 submission, the reviewer may consider problems in receiving a local building permit due to visibility.

## **Review Standards**

To enable an expeditious approval, complete and accurate submissions are required for review.

The SHPO's primary concern is the visibility of antennas and equipment on historic property and within historic districts. There are well-established guidelines for limiting the visibility of rooftop appurtenances and additions on historic landmarks and in historic districts.

It is highly advisable that consultants work with their design teams to avoid visible roof installations (this includes antennas, stealthing, cables, and associated equipment and its platforms). This advance planning effort can speed the process, result in projects with a finding of "No Adverse Effect," and expedite construction permit issuance by the city.

## Form 621 Submission Guidance

In order to determine potential visibility, the SHPO requires the following information with every submission:

**PHOTOS:** Clear, high-quality pictures of the subject building are essential.

- Photos of the subject building showing all sides without cropping parts of the building, from varying distances
- Additional photos looking toward the area of the roof where antennas and equipment are proposed, from as far back as necessary to show potential visibility
- Photos of historic properties within the Area of Potential Effect (APE). In a historic district, only photos of the immediately adjacent buildings are needed.
- Photos should be labeled—such as N, S, E, or W elevation (or SE, NE, etc. corner)
- Annotated photos with arrows pointing to the proposed antenna and/or existing antenna locations labeled with the words "proposed" and/or "existing"

- Photos of the rooftop, showing existing antennas and proposed locations
- Photos looking out from the roof are not necessary

**MAPS:** USGS topographic maps are not generally useful in a dense urban area such as the District of Columbia. Please submit a map or maps showing the building footprint and its location (with street names labeled and a North arrow). This map should include the APE. Some options are:

- Property Quest at www.propertyquest.dc.gov (this is DC's GIS system)
- Google Maps with the aerial function turned on
- Bing maps using the birds-eye setting
- Any other map that shows the building footprint and its surroundings

#### **DRAWINGS:**

- For historic landmarks and buildings in a historic district, a plan and elevations drawn TO SCALE are required, clearly demonstrating the exact sizes, locations, and mounts of all antennas and equipment
- For non-designated or eligible buildings, only a plan and drawings of the antenna types are necessary, unless otherwise requested by the SHPO
- 11 x 17 inch drawings are preferred
- Plans must show all existing telecommunications equipment
- Proposed installations should be clearly highlighted

# **Paper Reduction**

In the interest of paper reduction, the SHPO encourages double-sided submissions and does not require the following:

- Cover sheets for each section of the submission.
- Resumes or CVs for reviewers or consultants who have previously submitted to the DC SHPO, unless requested
- Tribal consultation information (there are no federally recognized tribes in DC)
- Printouts of the DC Inventory, NRIS, or other lists of historic properties
- Printouts of emails from towernotifyinfo@fcc.gov, a copy of the Public Notice, or copies of letters or mailing receipts to potential consulting parties, unless there has been a request to be a consulting party
- Local government correspondence (the DC SHPO is the local government representative so submissions of this sort are redundant).

# How long does the process take?

Routine reviews can be completed in a matter of 15 days, but may take up to 30 days.

## **HPO CONTACT**

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