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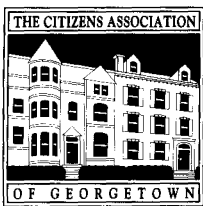
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Citizens Association of Georgetown
Statement to the Zoning Commission

Case 01-02 (Text Amendment) - Regulation of Antennas, Antenna
Towers, and Monopoles

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The extensive set of proposed regulations prepared by the Office of Planning covering siting, construction, and operation of antennas represent a significant contribution toward this new and proliferating element of urban design and land use. Much testimony has been received on a range of technical and operational matters, and the Citizens Association of Georgetown wishes to comment on a limited series of issues.

First, we strongly support the OP recommendation to preclude new broadcast towers and monopoles in residential and C-1 zones because these uses are incompatible with the purposes for which such zones were enacted. The special exception process should provide adequate control in SP, CR, W, CM, and C-2 through C-4 zones. These concerns would be multiplied in Historic Districts.

Similarly, we oppose siting antennas in public space, on parkland, at public schools, or on public utility poles, particularly in Historic Districts.

We ask you in the strongest terms to reject absolutely the Administration's request to exempt itself from the new regulations. Inasmuch as there is no distinction in health or safety or appropriateness between District-government antennas and the antennas of commercial applicants, we cannot endorse such a waiver of limitations. We would remind the Commission that, when a previous administration claimed the Hurt Home property was exempt from zoning regulation, the City Council enacted legislation to clarify the issue: District Government property is subject to zoning regulation. We ask the Commission to treat firmly with the request for exemption.

We also support the OP requirement that applicants for new transmitting antennas in zones where they can be erected be certified to comply with FCC radio frequency radiation emission guidelines and OSHA health and safety regulations. Similarly, OP's recommendation that any tower, pole, or equipment not used for a year be removed constitutes a real contribution to elimination of needless clutter.

ZONING COMMISSION
District of Columbia

Case 01-02
Exhibit 127

ZONING COMMISSION
District of Columbia
CASE NO.01-02
EXHIBIT NO.127

We are aware that some proposals have been made since the preparation of OP's reports, and we wish to support recommendations concerning minimizing the lights that may have to be installed to meet FAA air traffic warning standards. No other lights should be permitted to adorn towers and poles, nor should there be any advertising.

We also support an absolute requirement that poles, towers, antennas, and equipment cabinets be subject to design and screening as any other structure would be. In areas protected by District or Federal preservation laws, all proposed structures would be subject to review by the Historic Preservation Review Board or the Commission of Fine Arts.

We recognize the challenge of marrying new technology with a built environment, but we very much appreciate the Commission's work in protecting the established land-use zones and their character.

Barbara Zartman, Chair
Historic Preservation, Planning, and Zoning Subcommittee

November 8, 2002