

**TESTIMONY IN FAVOR OF STRINGENT ZONING REGULATION
FOR ANTENNAE TOWERS**

**Stephanie Smith Kinney
3607 Van Ness Street, NW, WDC 20008
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I am a citizen who lives in an area of Washington, D.C. adversely impacted by the indiscriminate siting of telecommunication towers and antennae without regard to their aggregate impact on the health and welfare of the community, the urban landscape, civilized esthetic values and any sense of responsibility to the residents of the area. I am participating in this roundtable to advocate more rigorous and demanding zoning guidelines and regulations in this regard.

In an effort to become better informed about the issues surrounding the construction of a 750 foot tower in Tenleytown, I contacted one of the foremost ERM survey experts on the East Coast. I was taken aback to learn that current FCC regulations only apply to individual towers and that there are no provisions for taking into consideration the effects of concentrations of towers in a given area. This is particularly worrisome for people who live on high ground such as the Mt. Saint Alban rise in the District or other similar zones favorable for tower construction from a technical point of view.

I urge the zoning board to include regulations that not only require that individual towers meet FCC emission guidelines but that also require new tower applicants to demonstrate through appropriate, standard emissions survey techniques that the aggregate level of ERM emissions and radiation in an affected area does not surpass FCC guidelines.

To be specific, after due public notice, applicants for new tower and antennae permits should have to conduct "hot spot" surveys of the area in which they wish to construct and present this data with their application. Using standard calculations subject to technical peer review, applicants should be required to estimate the increase in radiative intensity the full use of their proposed tower will create, i.e. the intensity that will result from the maximum number of antennae the tower can hold even if the initially projected number of antennae to be attached is less than that number. (One must assume that applicants intend to maximize their investment, especially when "speculative tower construction" is involved.) Otherwise, higher elevation areas in the District will be allowed to become "tower farms" without regard to the cumulative impact of multiple towers. Zoning guidance and regulation should consider the cumulative as well as individual impact of towers on human health and safety in the area, not to mention the impact on other important community values such as sound urban planning, esthetics and civilized residential and community environments.

ZONING COMMISSION
ZONING COMMISSION
District of Columbia
CASE NO. 01-0218
EXHIBIT NO. 5