



ADVISORY NEIGHBORHOOD COMMISSION 3-C
GOVERNMENT OF THE DISTRICT OF COLUMBIA

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Testimony Regarding ZC Case No. 01-02
Text Amendment Regulating Antennas, Antenna Towers, and Monopoles
Submitted by Nancy MacWood, Chair, ANC 3C

I am testifying on behalf of Advisory Neighborhood Commission 3C. The commission unanimously approved a resolution concerning zoning regulations affecting antennas, antenna towers and the structures on which they are installed at the February 2001 regularly scheduled meeting. I testified previously for the Commission on this subject at the Zoning Commission's Round Table.

ANC 3C supports the setback allowances in the text amendments and the data collection requirements added to the building permit process to insure compliance with Federal Communication Commission (FCC) guidelines and Occupational Safety and Health Administration (OSHA) regulations. The proposed standards and review procedures for antennas, antenna towers and monopoles will greatly improve the ability of the District of Columbia government to enforce the FCC guidelines and in so doing protect the health, safety and welfare of DC residents. We want to urge you however to require that actual field measurements be used to determine cumulative RF radiation emissions at a site before approval of an application for a new antenna at that location. We feel this would provide more reliable and valuable data than computer simulations of the same data.

We have recommended in the past that all antennas and antenna towers should be prohibited in or on landmark or historic district properties. Since new towers and monopoles would not be allowed in R and C1 zoned districts, we feel confident that most, if not all, historic properties will be protected. We note however that the Office of Planning (OP) is recommending that antenna towers and monopoles be excluded as a matter of right or special exception use in the Capitol Interest District (CAP). They point out that an historic district is part of the CAP and that a prohibition of antenna towers and monopoles in historic districts is consistent with Sections 106 through 108 of the Comprehensive Plan. ANC 3C urges the Zoning Commission to accept the OP recommendation.

ANC 3C endorsed the use of the special exception process for all new antenna tower or monopole applications. The text amendments make provision for the special exception process when ground, roof or building mounted antennas do not qualify as matter of right installations (Sections 2603.2, 2604.2, and 2605.2 respectively). We are concerned

ZONING COMMISSION
District of Columbia
Case 01-02
CASE NO. 01-02
EXHIBIT NO. 80

however that stealth structures are exempt from all requirements, except certification of compliance with FCC guidelines for transmitting antennas, and limitations that would be imposed if the antennas were not screened from view. We ask you to consider that all antennas present the same health, safety and welfare issues of concern to the District of Columbia and its residents. Whether covered, or uncovered, the government should insure that the FCC guidelines and OSHA regulations are being fully implemented. Therefore, we would urge the deletion of Sections 2603.1, 2604.1, and 2605.1 and Section 2606. Antennas encased in stealth structures should be subject to the review stipulated in the text amendments for that type of antenna.

As stated above, ANC 3C supports the setback allowances in the text amendments. However, we urge the Zoning Commission to revise Section 2611.7 to include after “residentially developed or zoned property” “hospital, school, or nursing home.” It would be consistent with the intent to locate antenna towers as far from residential areas as reasonable, to also require similar setbacks to protect vulnerable populations in hospitals, schools and nursing homes.

ANC 3C would also recommend that the special exception process provided in Section 2611 include an additional subsection under Section 2611.11 to require the applicant to provide the BZA with the maximum capacity of the tower or monopole, the number of each type of antenna to be installed and the estimated RF radiation emissions from the tower at capacity. This would allow the BZA to evaluate whether the size of the tower matches the projected use and even limit the number of antennas approved at that site under the special exception. We further recommend that applicants for new antennas subject to the special exception process should be required to submit and certify information to determine if the antenna meets OSHA regulations and the FCC’s individual and cumulative site RF radiation emission guidelines.

I thank the Zoning Commission for the opportunity to testify today. I applaud the sustained efforts of the Commission to grapple with this complicated subject; your responsible approach to this very important matter and your commitment to safeguarding the health, safety and welfare of visitors and residents alike is greatly appreciated in my community.