

Zoning Commission For the District of Columbia
Office of Zoning
441 4th Street, NW
Suite 220
Washington, D.C. 20001

RE: Case No. 01-02 Text Amendment-Regulation of Antennas,
Antenna Towers, and Monopoles

I am Marija Hughes, living at the 2400 Virginia Avenue, NW, Apt. C501, Washington, D.C. 20037. I will testify for the Columbia Plaza Tenants Association. I am an author of three books entitled Computer, Antenna, Celullar Telephone and Power Line Health Hazards, 1966. I have been delivering lectures in this country and abroad for about 14 years. This bill is an improvement over the previous one. My comments are not critical but suggestions to the existing text. I will comment on the aspects of public health and telecommunications services.

The text of the Regulation is an outgrowth of a participatory process and it is pretty good. The proposed amendments seek to protect public health and safety and provide flexibility. It is a step in the right direction.

I wish to make the following comments:

2600.1 sec c Add: More assurance that Board of Zoning Adjustment, considers antenna location on public health and safety. And add: Office of Planning report, examine effect on Health and Safety and cummulative effect on these antennas. Too little is known as to the effects on the Health and Welfare on the population. There might be a very serious health effect.

2601.2 sec c Add: ..of Sites already in existance add the existing radiation within certain distance. Add uniform distance where cummulative effects are measured.

2602 MATTER OF RIGHT ANTENNAS

2602.1 Add: Potential renewal of existing broadcasting antennas.

Add: Time limit, 5 years or maximum 10 years. Renewal of antennas should be five year limit. Every five years, antennas particularly the transmitting antennas should be reviewed for the impacts. There may be no impact when the antenna is installed. However, after 5 years it should be examined to determine if there may be, and continues to be, no impact.

2603 GROUND-MOUNTED ANTENNAS

- 2603.1 sec. g: Extended to the entire city. Why only in central employment area? It should be in other areas such as Rock Creek Park, NE Washington.
- 2603.1 sec. j: The antenna installation shall be as small as is practical for its intended use.
How will this be demonstrated? Who is going to make the judgement? Office of Planning (which does not have the experience), Board of Zoning Adjustment, engineering consultant to determine small as practical?
- 2604.1 sec. c2 Any public park or public open space within at least 2 miles.
- 2604.1 sec. c3 Any historic landmark structure or site within at least two miles
- 2604.1 sec. e2 Transmitting antennas shall be oriented such that transmission is not directed at the recreation space. How will this be demonstrated?
- 2604.1 sec. f What does navigable waterways mean? Defined by whom?
- 2604.1 sec. f1 Constructed of material and colors that harmonize (blend) with the building or penthouse: and
- 2604.1 sec. f2 Located to reduce its visibility from public space to the greatest practicable extent determined by whom applicant, Board of Adjustment or Board of Zoning?

2605 BUILDING-MOUNTED ANTENNAS

- 2605.1 sec. b2 Change one quarter mile into one mile.
- 2605.1 sec. b3 Add: Any historical landmarked structure or site within one mile.

- 2605.1 sec. f To avoid off-site reception interference..
What does it mean? Who will insure that it is the
case, to see that it is done.
- 2606 EXEMPTED ANTENNAS
- 2606.1 sec. a What does it mean? Broadcasting antennas are
exempted? Are TV studio antennas exempted?
- 2607.1 sec. b Who will determine the appearance of antennas or
monopoles which will not have an adverse impact?
- 2608 This section should include Review under time limit,
and also review period.
- 2609.3 This section does not make sense. The Zoning
Administrator's normal function is to determine
if the antenna complies with the applicable requirements
Office of Planning certifies that the information
enables the Zoning Administrator. This section
should include "antenna complies with the cumulative
effect."
- 2611.3 sec. d Take out CR. Should add "Not permitted
in residential, in CR residential upper floors
should not be allowed, as matter of right.
Commercial, but not in CR residential."
- 2611.4 sec. b add maximum of to read: "Designed and available for
maximum of co-location by other providers;
- 2611.4 sec. c change or into and after public space, and appropriately
screened..
- 2611.6 We have the Height Act. The law stated in this
paragraph should be changed.
- 2611.10 sec. d Add "Certification by FCC on that effect."
- 2611.11 sec. g On co-location, what is the maximum on the monopole?
- 2611.11 sec. i. The height of the antennas-in which distance, one mile,
two miles, how far it should apply?
- 2611.12 With the image of the city the Planning Commission
should be involved and it should refer to the
Planning Commission.
- 2612.2 sec. c The section states that after 3 months after a non-
confirming antenna stops functioning a longer term
antennas should be put. do you know that the
antenna stopped functioning? The burden is on the
applicant to monitor. The owner should apply again.
I disagree with the term "to install a longer term
replacement."
- 2613.1 Take out "enlarged", but give the right side.

- 2613.2 sec a Eliminate the section, if it does not provide service, why encourage the owner to non-conforming^g
- 441.15 This section should also include cummulative. The question is at what point 2, 3, 4, radiating antennas cause harm.
- 601 Take out CR
- 601.1 sec s The entire section should be taken out, since on p. 7717 you are deleting the section.
- 2606 STEALTH STRUCTURE
- 2606.6 sec b Where did this 1,000 feet standard come from?
- 2606.6 sec e Add residential to read "The primary use of the subject property is not residential single-family residential."