# STAFF RECOMMENDATION

**NCPC File No. 6447**

**H.H. HUMPHREY BUILDING**
INSTALLATION OF T-MOBILE USA ANTENNAS
200 Independence Avenue, SW
Washington, DC

Submitted by the General Services Administration

March 25, 2004

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## Abstract

The General Services Administration has submitted plans for the installation of T-Mobile USA antennas on the roof of the H.H. Humphrey Building at 200 Independence Avenue, SW. Three sets of three transmitting and receiving antennas will be attached to the penthouse façade and three equipment cabinets will be installed on the building's roof at the base of the penthouse.


## Commission Action Requested by Applicant

Approval of preliminary and final building plans pursuant to 40 U.S.C. § 8722(d) and Section 5 of the National Capital Planning Act (40 U.S.C. § 8722(b)(1)).

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## Executive Director's Recommendation

The Commission:

**Approves** preliminary and final building plans for the installation of three sets of three transmitting and receiving antennas and three equipment cabinets on the roof of the H.H. Humphrey Building at 200 Independence Avenue, SW, as shown on NCPC Map File No. 1.72(38.00)-41333.

**Requires** that the General Services Administration commit to a radiofrequency safety program for maintenance personnel on the roof.

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## PROJECT DESCRIPTION

### Site

The H.H. Humphrey Building is bounded by Independence Avenue, SW to the north, C Street to the south, 2nd Street to the east, and 3rd Street to the west. Adjacent and nearby buildings include the Wilbur J. Cohen Building to the west, the Mary E. Switzer Building to the southwest, and the Food and Drug Administration to the south. To the north is an open area under the jurisdiction of the Architect of the Capitol.

### Background

The General Services Administration has submitted plans for the installation of T-Mobile USA antennas on the roof of the H.H. Humphrey Building. Three sets of three transmitting and receiving antennas and three equipment cabinets will be installed on the penthouse walls and roof. There are currently 49 antennas located on the building, on both the main roof and the penthouse roof. These existing antennas include both government antennas and antennas installed by other telecommunications providers.

### Proposal

Three sections of three antennas each will be mounted flush on the penthouse facades at the roofline. Each three-antenna panel will be 54 inches long, 12 inches wide and 8 inches deep and will be painted to match the penthouse facade. The antennas will not exceed the height of the penthouse.

The three equipment cabinets will be 63 inches high, 51 inches wide, and 28 inches deep and will also be painted to match the penthouse. They will be installed on a steel platform to be constructed on the roof at the base of the south façade of the penthouse.

## PROJECT ANALYSIS

### Executive Summary

The staff recommends that the proposal be approved. The applicant will locate the antennas and the equipment cabinets to minimize their appearance, and they will not be readily apparent to the public. The proposal is consistent with the Commission's Antenna Guidelines and with the Telecommunications Act of 1996 encouraging placement of commercial antennas on federal property.

### Radiofrequency Radiation

An analysis determining the potential effects of radiofrequency radiation on the general public and occupational personnel was prepared by Wireless Systems Engineering of Sterling, Virginia, in February 2004. This analysis used a computerized evaluation program to determine the electromagnetic power surrounding the existing and proposed antennas and measure compliance with the Maximum Permissible Exposure (MPE) limits for the general public and occupational personnel.

No areas off the roof exceed 100 percent of either the general public or occupational worker exposure levels. Only by climbing a ladder in close proximity to telecommunications antennas

could exposure levels exceed the maximum allowable to the general public. Cumulative effects of any exposure levels have been factored by the evaluation program and have found to be within all standards specified by the Federal Communications Commission requirements. The analysis also determined that it is extremely unlikely that any personnel would come in contact with areas that exceed MPE because there would be no serviceable items on the penthouse façade with the exception of the antennas themselves. Nonetheless, the analysis resulted in several radiofrequency safety program recommendations, including:

- Controlling access to the roof.
- Wearing radiofrequency exposure monitors when on the roof.
- Posting roof drawings indicating where MPE could be exceeded.
- Reducing antenna power prior to performing work at antenna heights.
- Periodic monitoring of radiofrequency levels on the roof.
- Additional analysis if changes are made to the operation or number of antennas.
- Removing unused antennas from the roof.

## CONFORMANCE

### Comprehensive Plan for the National Capital: Federal Elements

Staff has determined that the antenna installation would not have an effect on other federal facilities, on L'Enfant Streets, or on historic properties and will be consistent with the Federal Elements of the Comprehensive Plan.

### National Environmental Policy Act

Pursuant to the regulations implementing the National Environmental Policy Act, the General Services Administration has determined that the proposed project qualifies for a categorical exclusion from the requirement to prepare further environmental analysis. Staff review of the conclusion finds the determination supportable.

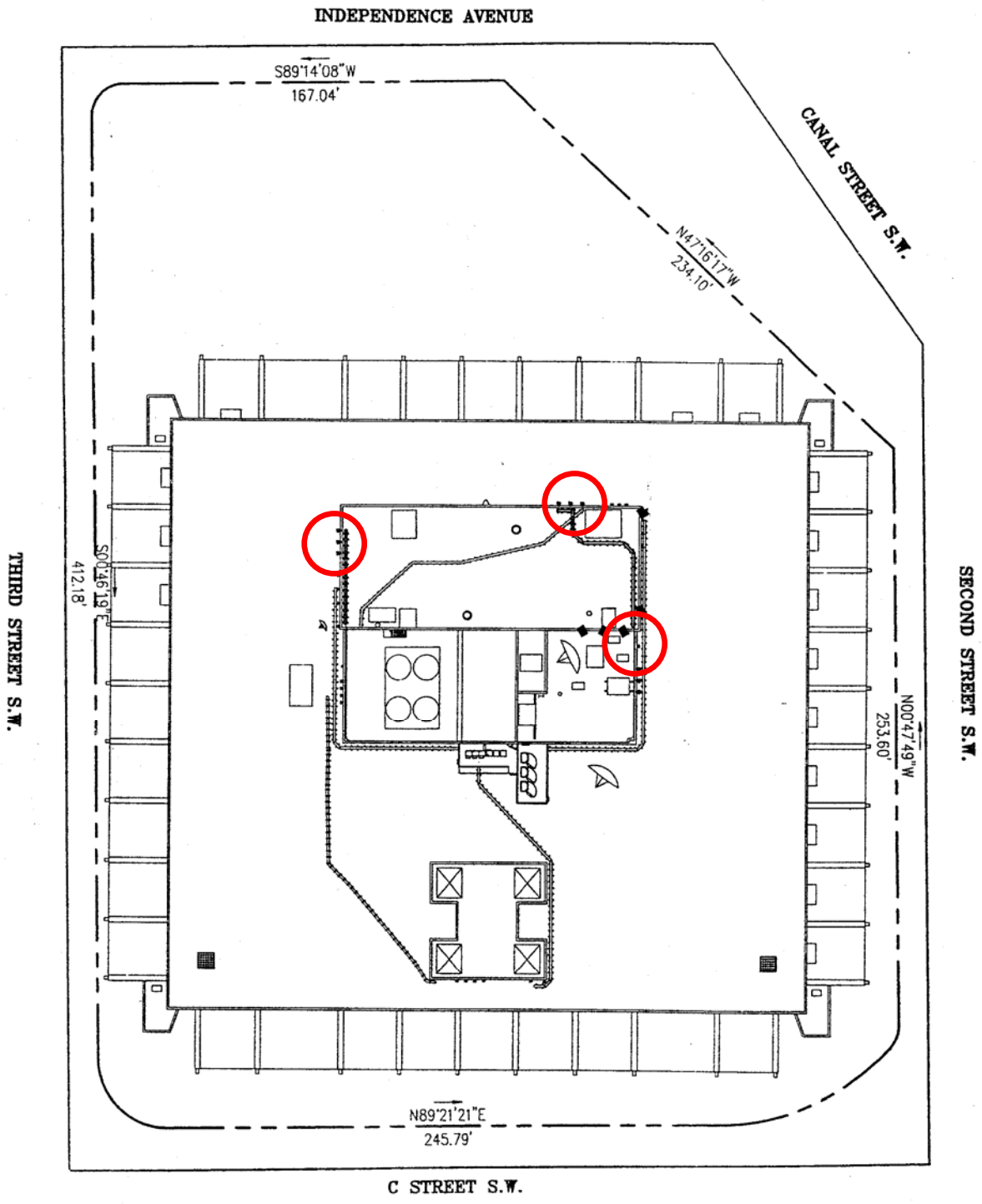
### National Historic Preservation Act

The H.H. Humphrey Building is not listed in the National Register of Historic Places. The General Services Administration has determined that the installation of the antennas would not affect any historic properties and that no further Section 106 review is required for this project.

## CONSULTATION

### Coordinating Committee

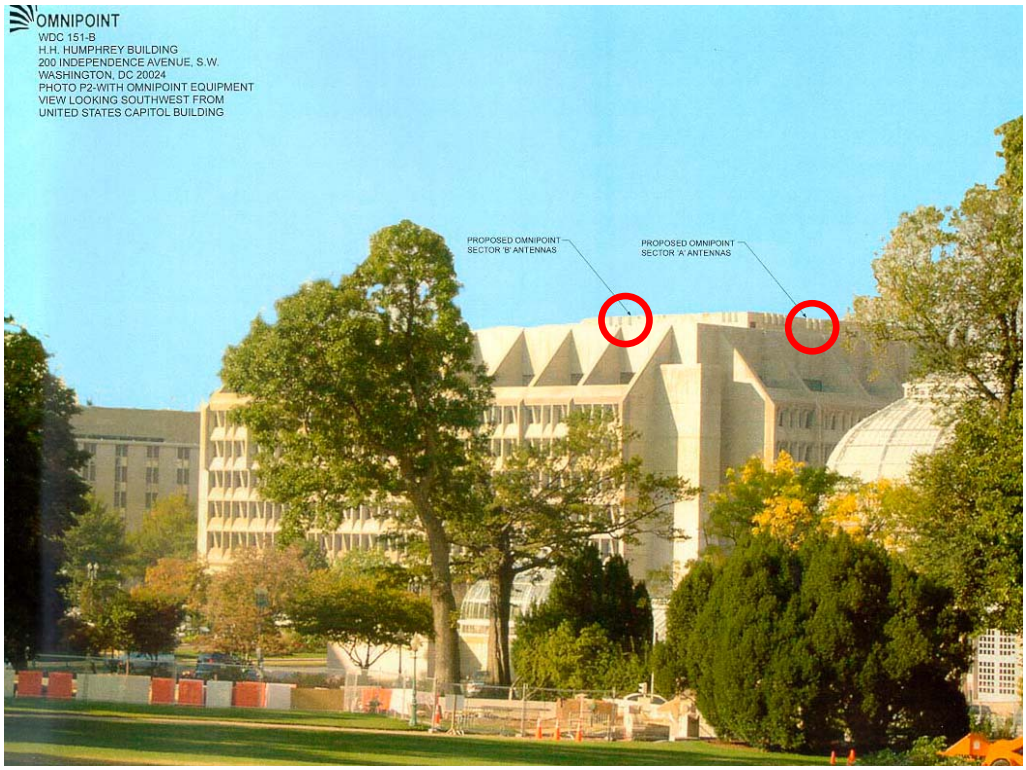
The Coordinating Committee reviewed this item at its meeting on March 10, 2004, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the Department of Housing and Community Development; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.




Roof Plan

Proposed Antenna Locations

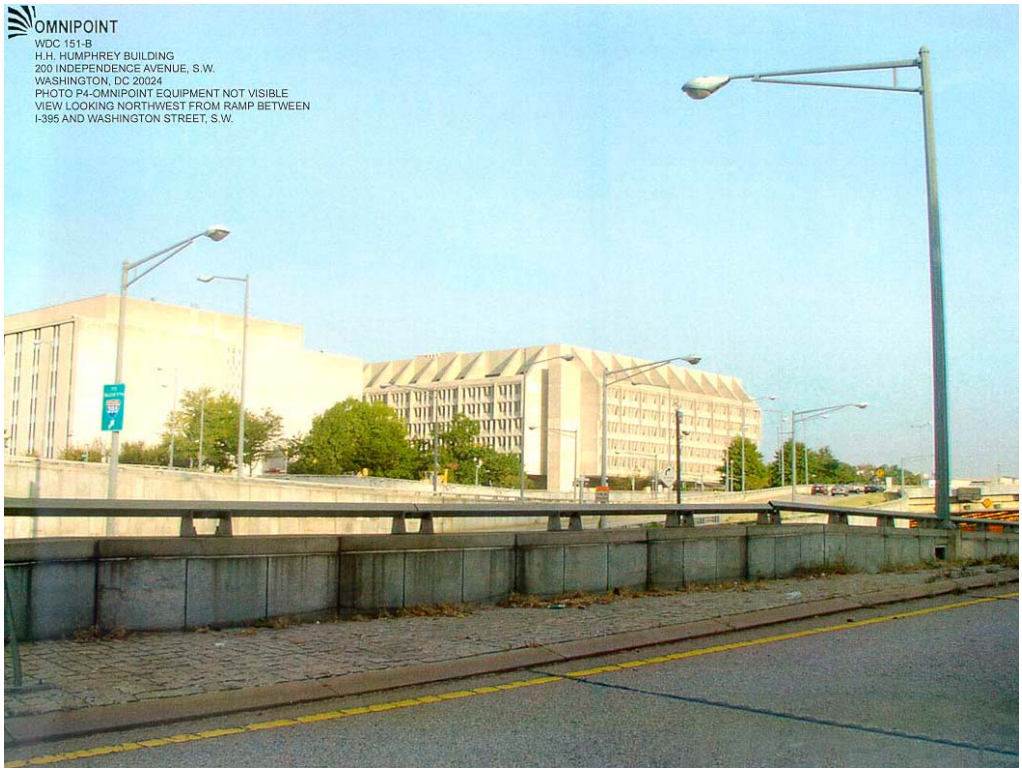

4th Street SW and Jefferson Drive SW




From U.S. Capitol

Proposed Antenna Locations


1st Street SW between Independence and C Streets




Ramp between I-395 and Washington Street SW