

September 15, 2025

## Testimony Submitted in opposition to ZTA 25-11

Dear Montgomery County Council,

I write to urge you to oppose the Zoning Text Amendment (ZTA) [25-11](#). As stated by MC4T, “this ZTA is a solution looking for a problem. It would allow for cell towers up to 200 feet in height anywhere in the county – including in residential zones, near schools, and apartments – with no due process and no minimum setback. Rather than complying with the existing zoning code, the industry is asking for a giant loophole: the ability to put cell towers anywhere in the county, and in many cases without even obtaining a building permit – bypassing decades of precedent in local zoning.”

### Cell Towers and Property Values: Realtor Evidence and Published Research on Market Impacts

Realtors report that visible cell towers can cut nearby home values by up to 20%, and published analyses confirm these documented market losses. Legal filings by cities and municipalities, including Montgomery County to the FCC highlight how wireless deployment could impact aesthetics and property values.

“While the magnitude of the impact varies, the studies uniformly indicate that there is a significant impact on residential property values from installation of cell phone towers...”

**-Report and Declaration for the Smart Communities Siting Coalition [which includes Montgomery County] by David E. Burgoyne, ASA, SR/WA Certified General Real Estate Appraiser to the FCC in Docket 16-421**

[Realtors](#)

[Regulatory Filings by Cities and Municipalities](#)

[Published Papers](#)

### Realtors

Oakland Michigan Realtor letters documenting property devaluation. [Link to PDF.](#)

“Buyers are extremely hesitant to purchase homes located near cell towers, and in many cases, homes next to towers take longer to sell and ultimately sell for less.”

“In my professional experience, a visible cell tower in close proximity to a property can reduce its value by as much as 20%.”

“Prospective buyers often tell me they would not consider purchasing a home near a

Information on property values and science on cell tower health effects was taken from [Environmental Health Sciences Information on Cell Towers Science and Policy](#)

tower because of both aesthetic and health concerns.”

“As realtors working in this market, we consistently see that towers negatively impact demand, creating stigma that directly translates into lower property values.”

"Cell Towers, Antennas Problematic for Buyers" [Realtor Magazine](#)

"An overwhelming 94 percent of home buyers and renters surveyed by the National Institute for Science, Law & Public Policy (NISLAPP) say they are less interested and would pay less for a property located near a cell tower or antenna."

"of the 1,000 survey respondents, 79 % said that under no circumstances would they ever purchase or rent a property within a few blocks of a cell tower or antennas, and almost 90% said they were concerned about the increasing number of cell towers and antennas in their residential neighborhood."

[National Association of REALTORS® FCC Letter](#) expressing concern over its proposed rule regarding over-the-air reception devices.

“Cellphone towers bring extra tax revenue and better reception to a section of the city, but many are skeptical because of the potential health risks and the impact on property values. Increasing numbers of people don’t want to live near cell towers. In some areas with new towers, property values have decreased by up to 20%.”

-National Business Post: [Your new neighbor, a cell tower, may impact the value of your home](#)

[National Association of REALTORS Magazine “Homeowners Complain About ‘Ugly’ 5G Boxes in Their Yards” January 27, 2021](#)

“Wireless companies are installing boxes in front of homes as part of their 5G network rollout. But homeowners aren’t pleased, calling the chest freezer–sized boxes a big eyesore in their front yards.”

## Regulatory Filings by Cities and Municipalities

[Reply Comments of Smart Communities Siting Coalition \(representing local governments and associations from 1,854 communities\), WT Docket No. 16-421, at 25 \(filed Apr. 7, 2017\).](#)

"many deployments of small cells could affect property values, with significant potential effect..."

[Ex Parte Submission of Smart Communities Siting Coalition Letter to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 16-421. Filed September 19, 2018](#)

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"Considering that the Smart Communities' prior filings show that the addition of facilities of this size diminish property values, it is strange for the Commission to assume that approval can be granted in the regulatory blink of an eye...."

"...allowing poles to go up in areas where poles have been taken down has significant impacts on aesthetics (not to mention property values)."

[Report and Declaration of David E. Burgoyne, ASA, SR/WA, "Impact of Communication Towers and Equipment on Nearby Property Values," in WT Docket No. 16-421 \(Smart Communities Siting Coalition, filed Mar. 7, 2017\).](#)

"There has been significant research regarding the question of the impact on residential property values from construction of cell phone towers in neighborhoods. The results of these studies vary but they commonly indicate that there is a significant impact. While the magnitude of the impact varies, the studies uniformly indicate that there is a significant impact on residential property values from installation of cell phone towers. Not surprisingly, the studies that show little or no impact are universally commissioned by and paid for by the telecommunications industry."

"The term 'small cell' may involve many different pieces of equipment, some of which could be quite large and quite intrusive... some of these facilities may be mounted on the tower or pole; an antenna; radio units; power supplies/electric meters/disconnects/cabling; and potentially back-up power supplies."

## Published Papers

Rajapaksa, D., Athukorala, W., Managi, S. *et al.* [The impact of cell phone towers on house prices: evidence from Brisbane, Australia.](#) *Environ Econ Policy Stud* 20, 211–224 (2018).

"Property transaction data collected from two suburbs within the Brisbane City Council were analysed adopting the spatial hedonic property valuation model. The estimated models were statistically significant and were largely in line with theoretical expectations. The results revealed that proximity to cell phone towers negatively affects house values, decreasing as the distance from the tower increases. A suitable compensation programme for nearby property owners is, therefore, suggested as being an appropriate policy response."

Cheruiyot, K., Mavundla, N., Siteleki, M., & Lengaram, E. (2024). [Impact of proximity to cell phone tower base stations on residential property prices in the City of Johannesburg, South Africa.](#) *International Journal of Housing Markets and Analysis*, 17(6), 1422-1442

"Findings: The results show a significant impact that proximity of CPTBS has on residential property sale prices. However, the impact of CTPBSs' proximity on residential

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property prices depends on their distance from the residential properties. The closer a residential property is to the CTPBS, the greater the impact that the CTPBS will have on the selling price of the residential property.”

Affuso, E., Cummings, J. R., & Le, H. (2018). [Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis](#). *Journal of Real Estate Finance and Economics*, 56(3), 653-676.

“For properties located within 0.72 kilometers of the closest tower, results reveal significant social welfare costs with values declining 2.46% on average, and up to 9.78% for homes within tower visibility range compared to homes outside tower visibility range; in aggregate, properties within the 0.72-kilometer band lose over \$24 million dollars.”

Affuso E, Cummings JR, Le H. [Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis](#). *J Real Estate Finan Econ* 56, 653–676 (2018). doi: 10.1007/s11146-017-9600-9.

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[The Cost of Convenience: Estimating the Impact of Communication Antennas on Residential Property Values](#), *Land Economics*, 2016

“ We take advantage of a rich dataset of residential housing sales from central Kentucky that contains an extensive set of structural housing characteristics and precise location information. This allows us to overcome endogeneity issues caused by unobservable characteristics correlated with antenna location. The best estimate of the impact is that a property with a visible antenna located 1,000 feet away sells for 1.82% (\$3,342) less than a similar property located 4,500 feet away. The aggregate impact is \$10.0 million for properties located within 1,000 feet. (JEL Q51, R21)”

**Bond, S. (2007).** The effect of distance to cell phone towers on house prices (Florida case study). *The Appraisal Journal*, Fall 2007, 362–370. [PDF link](#)

“The research on the possible effect of cell towers on property values is extensive. In general, proximity to a cell tower appears to have a negative effect on property values. A study from the University of South Alabama analyzed over 23,000 home sales in Mobile County, Alabama relative to their proximity to cell towers. The researchers found

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[Environmental Health Sciences Information on Cell Towers Science and Policy](#)

that homes within 0.72 km of a cell tower decreased in value an average of 2.65%. In addition, if the cell tower was visible from the property, then the properties decreased an average of 9.78%. A similar study in Kentucky found that properties within 1,000 feet of a cell tower sold for 1.82% less than a similar property located 4,500 feet away.”