September 21, 2018

Mr. Matthew J. Marcou
Public Space Committee
c/o Public Space Permit Office
District Department of Transportation
1100 4th Street SW, Room 360
Washington, D.C. 20024

Re: Small Cell Guideline Comments

Dear Mr. Marcou:

On September 12, 2018, at a duly noticed and regularly scheduled monthly meeting, with a quorum of five out of five commissioners and the public present, the commissioners voted 5-0 to support making the following comments to the Public Space Committee concerning the draft Small Cell Design Guidelines dated 8/24/2018:

* Section 5.2.1.4. The requirement that standalone poles are not permitted if suitable existing poles are present is important to be preserved in the final version of the guidelines in order to limit the number of standalone poles.

* Sections 5.3.4.1 and 5.3.4.2 state antennas on existing or standalone poles may not be greater than 31' combined height or more than 10% above existing poles, whichever is GREATER but should be LESS. As written, these sections would allow a 10' antenna to be placed on a 20' street light.

* Chart 2. The number of cells allowed per block is excessive for larger blocks if all five carriers seek to place cells on a block over 750’.

* Section 6.1. Restricts cells from being within 20’ of the front or side boundary lines of a D.C. Landmark, a National Historic Landmark, federal properties or a property individually listed in the National Register of Historic Places. In addition, however, standalone poles should be prohibited when within a certain, greater distance of these landmark properties. Furthermore, the phrase “federal properties or a property individually listed in the National Register of Historic Places” needs to be clarified, as it is unclear whether the intent is to restrict small cell installation near ALL federal properties or only those listed in the Register.
* Sections 8.2.3 and 8.4.2 seek to protect trees and their critical root zones but the guidelines should in addition protect the tree canopy. In Section 8.2.3, in the phrase “poles shall not be located in a manner that requires the removal of an existing street-tree or that prevents the planting of a street tree in the future” insert “or significant pruning of more than 5 percent of its canopy” after “the removal”. In Section 8.4.2, in the phrase “Trees shall not be removed or have their critical root zones damaged for the installation of Small Cell Infrastructure” insert “or their canopies” after “critical root zones”.

* Missing from the guidelines is control over the number of cells on a large scale. The Guidelines limit the number per block but there is no prohibition on small cells being installed on every block in the District. The guidelines should place limits on a larger scale. If the technology requires a massive number of cells, the program should be reconsidered.

* ANC 6C is not endorsing the draft Small Cell Guidelines even with adoption of these suggested comments and believes additional study and refinement should take place before their adoption.

Thank you for giving great weight to the views of ANC

On behalf of ANC 6C,

Karen Wirt
ANC 6C chair