



Commission Action

December 6, 2018

PROJECT Small Cell Infrastructure Guidelines Washington, DC	NCPC FILE NUMBER 7994
SUBMITTED BY District of Columbia Department of Transportation	NCPC MAP FILE NUMBER 00:00(41.22)44850
REVIEW AUTHORITY Approval per 40 U.S.C. § 8711(e)(2)	APPLICANT'S REQUEST Approval of comments on draft guidelines
	ACTION TAKEN Approved comments, with amendments

The Commission:

Recognizes the growing demand for wireless technology and more importantly, that the need to relieve congestion on existing networks is essential for people living and working in Washington, DC, including residents, visitors and the federal workforce.

Finds small cell facility deployment requires significant infrastructure that will affect the aesthetic and functional aspects of the public realm.

Notes that as the federal planning agency for the nation's capital, NCPC has a focused interest on preserving and enhancing the form, character and experience of the nation's capital, particularly within the historic L'Enfant City and around the significant concentration of federal interests and prominent national resources found in the core of Washington, DC.

Notes that NCPC has not focused its analysis on other parts of the District where other issues may be of interest to various stakeholders.

Federal Core Interest Area Map

Accepts the *Federal Core Interest Area Map* that identifies the only permissible locations for small cell facilities on District rights-of-way in the areas of highest federal interest around the National Mall.

Requests DDOT include the *Federal Core Interest Area Map* in the Final Guidelines for use in locating small cell facilities in this area.

Notes that staff identified small cell facility locations for the map in consultation with the GSA and NPS and based on the following factors:

- Discussions with DDOT and the providers regarding areas where coverage is needed;
- Spacing guidelines adopted in other cities;
- Prioritizing placement near intersections, where possible, to improve coverage along street corridors;
- Avoiding placement in front of building entrances and important public spaces;
- Avoiding impacts to important views and viewsheds; and
- Prioritizing the use of existing cobra poles.

Notes that NPS has been evaluating the potential for small cell coverage on the National Mall, and therefore the opportunity exists to coordinate facility locations in and around the National Mall, including Constitution and Independence Avenues.

Directs staff to coordinate with NPS, the Smithsonian Institution and other interested landholders in evaluating coverage needs and potential solutions that include the National Mall, Constitution and Independence Avenues over the next six months.

Requests that no facilities be permitted along Constitution or Independence Avenues until a more comprehensive evaluation of coverage needs and facilities placement can be developed considering National Park Service property, the Smithsonian Institution museums and other lands within the National Mall.

Recommends the number and placement of facilities be reevaluated in the future in consultation with NCPC, after all locations are used, technology has changed, and specific carriers provide information about their evolving needs.

Review Process

Notes DDOT is responsible for reviewing and approving permit applications for small cell facilities within District rights-of-way. Applications that meet the guidelines will be approved administratively, while those that require exceptions from the guidelines will be reviewed by the District's Public Space Committee.

Requests DDOT revise the guidelines so that if a carrier seeks an exception from the guidelines within the streets identified on the Federal Interest Area Map, or adjacent to any federal property, the exception request will require NCPC review and concurrence prior to the initiation of permit review by DDOT.

Requests DDOT revise the guidelines so that any proposal to move or alter temporary or permanent security elements along or adjacent to federal property will require NCPC review and concurrence prior to submitting to DDOT for permit review.

Infrastructure Design

Notes DDOT is considering developing a design typology for new standalone poles, working with NCPC, the U.S. Commission of Fine Arts, and carriers over the next six months. During that period, small cell facilities would be limited to existing pole locations.

Supports such a process and finds that the development of a high quality pole design and unified standalone typology will be beneficial to the District of Columbia and can be an example to other cities.

Notes that DDOT may remove the requirement to underground cabinetry and equipment in the final guidelines due to the carriers' statement regarding the financial and technical challenges of doing so, but undergrounding should be allowed where feasible.

Requests that if undergrounding is not feasible, that DDOT evaluate design options to minimize visual clutter by requiring cabinetry and other equipment be integrated into the pole base or located within a separate stand-alone box, instead of attached to the pole.

Other Guidelines

Notes that NCPC staff have provided additional comments to DDOT for inclusion in the guidelines, consistent with the Commission's previous comments. They include:

- Encouraging hoteling to reduce the number of facilities, and therefore minimize the number of new elements proposed within the public realm.
- Clarifying where facilities are permitted, particularly adjacent to federal property and reservations administered by the U.S. government, outside of the Federal Core Interest Area map.
- Adding guidance regarding the placement of facilities in relationship to buildings, building architecture, and open spaces where they intersect with the streetscape.
- Clarifying guidelines regarding the placement of new poles and other components of the streetscape.

// Original Signed //

December 7, 2018

Julia A. Koster

Secretary to the National Capital Planning Commission