



Commission Action

November 1, 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)44805
REVIEW AUTHORITY Advisory per 40 U.S.C. § 8711(e)(2)	APPLICANT'S REQUEST Approval of comments on draft guidelines
	ACTION TAKEN Approved comments, with amendments, on draft guidelines

The Commission:

Appreciates the close collaboration between the District Department of Transportation (DDOT) and District and federal agencies in developing the draft guidelines.

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.

Finds that the federal and cultural resources of the National Mall and its environs are inherently unique in the District due to the unprecedented number of monumental Beaux Arts buildings, historic Washington Globe and Twin-20 light fixtures, landscaped building yards, terminating viewsheds, perimeter security, and tree coverage.

Finds that these unique circumstances will affect the placement and coverage of small cell facilities in this area in ways that are not applicable to other parts of the District.

Finds the fundamental challenge is how to create small cell guidelines for this unique area around the National Mall that allow for modern technology and innovation while preserving the defining characteristics of the nation's most important public realm and buildings.

Notes the draft guidelines should be evaluated based on both urban design and network coverage, which are interrelated, and ultimately allow for network coverage in way that minimizes impacts to the public realm in the symbolic heart of the nation.

Evaluation of Study Area around the National Mall and its Environs

Notes the draft guidelines prevent the placement of small cell facilities adjacent to federal properties and National Park Service reservations.

Supports the provision limiting small cell facilities adjacent to National Park Service reservations as the facilities will likely be more visible and intrusive adjacent to park space as opposed to a building setting.

Finds the draft guidelines could result in gaps in coverage in areas around the Federal Triangle, Northwest Rectangle and Southwest Rectangle primarily due to the limitation of facilities located adjacent to federal properties.

Finds that if the draft guidelines allowed small cell facilities adjacent to federal properties in the study area, they would allow 158 standalone poles and 32 facilities attached to existing pendant poles with cobra heads, largely throughout the Federal Triangle, Northwest Rectangle and Southwest Rectangle.

Advises that if it is determined that small cell facilities are needed in this specific area, the guidelines will need to address a number of unique issues related to the character and function of the public realm near the National Mall and its environs, including: facility placement and spacing; building entrances and architecture; cabinetry and related equipment; and pole design and attachments.

Therefore, for the area around the National Mall and its environs, identified as the study area, the Commission:

Facility Placement and Spacing

Supports restricting the placement of small cell facilities on Washington Globe and Twin-20 light poles due to their purposeful design, historic association and presence throughout the monumental core.

Finds there are relatively few existing cobra light poles in the study area for attaching small cell facilities, and as a result, new standalone poles would likely be necessary to satisfy coverage needs.

Finds that new standalone poles tend to cluster along certain block faces, while other block faces may have fewer small cell facilities due to a combination of the various criteria included in the draft guidelines.

Notes that some important corridors, such as Constitution and Independence Avenues adjacent to Smithsonian museums and the National Mall, could have a number of new standalone poles. The introduction of new poles, in conjunction with existing streetscape elements, could contribute to additional visual clutter in front of buildings and within the streetscape. The size, number and repetitive nature of standalone poles may dominate the streetscape and be quite noticeable.

Finds that there is insufficient information available to determine the relationship between the carriers' needs in facility placement and coverage, and the spacing permitted under the guidelines.

Requests that DDOT work with the carriers to provide the following information to staff to help inform their analysis and ultimately the Commission's recommendations for the final guidelines:

- A composite map of all the desired locations of the small cell providers to understand the total need for facilities and the areas of highest demand within the study area.
- An understanding as to why there is no requirement for multiple providers to share infrastructure (hoteling) and whether this could occur if the number of allowable poles were reduced.
- Consideration of a phased approach whereby the first issuance of the guidelines allows a more conservative number of poles (i.e. instead of allowing nine new facilities on one block of 14th Street, NW, the number is reduced). Then based on demand over the next couple of years, the guidelines can be reassessed.

Recommends that DDOT include language to strongly encourage hoteling as a preferred solution.

Recommends that DDOT include language to encourage strategies to reduce the visual impact and presence of small cell infrastructure in the streets, such as equipment undergrounding or rooftop installations.

Building Entrances and Architecture

Finds if the guidelines allowed standalone poles adjacent to federal properties, some could be placed in front of entrances to significant buildings, such as the National Archives, Department of Commerce, and Portrait Gallery.

Finds the placement of standalone poles in front of entrances to important civic and cultural facilities is not appropriate due to their architectural or visual prominence and need to accommodate pedestrian access.

Cabinetry and Related Equipment

Finds that above-grade cabinetry and other related equipment would detract from the views of the many significant prominent and historic federal buildings and viewsheds in and around the National Mall.

Finds that new poles and at-grade cabinetry has the potential to impact pedestrian circulation and access.

Notes that the providers have expressed concerns about the cost and feasibility of vaulting equipment.

Supports underground cabinetry and other related equipment to the maximum extent possible.

Pole Design and Attachments

Notes each carrier may have a unique antenna style and configuration, including both top-mounted and collar installations.

Finds that installations of varying designs on multiple poles within a block face may look disjointed or cluttered, particularly when inserted in cohesively-designed streetscapes, such as those around federal buildings.

Supports the comment of the U.S. Commission of Fine Arts at their September 27, 2018 meeting, when they “advised the development of an elegant and holistic design typology for the small-cell installations...”

Requests that DDOT work with the U.S. Commission of Fine Arts and NCPC to convene a meeting with the carriers and industrial designers to develop a unified design typology for poles and related equipment.

Advises that given the unique setting of the National Mall and its environs, and the concentration of federal facilities, memorials and monuments, a detailed map of preferred standalone pole locations will be necessary to reconcile coverage needs and impacts to the public realm, if it is determined additional coverage is needed for the study area. Further, a specific location map will provide predictability and certainty for providers, and will help streamline the process for both carriers and DDOT.

Directs staff to prepare a detailed map of preferred standalone pole locations, taking into account the regulating criteria of the draft guidelines, coverage needs, and the desire to protect the nation’s

most important public spaces. The map will be reviewed by Commission on December 6, 2018, and transmitted to DDOT for consideration in the final guidelines.

// Original Signed // November 6, 2018

Julia A. Koster
Secretary to the National Capital Planning Commission

