



Executive Director's Recommendation

Commission Meeting: March 7, 2019

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(38.30)44893
REVIEW AUTHORITY Review of Plans and Projects for Consistency with the Comprehensive Plan per 40 U.S.C. § 8711(e)(2)	APPLICANT'S REQUEST Approve of final comments on draft guidelines
	PROPOSED ACTION Approve final comments on draft guidelines
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

The District Department of Transportation (DDOT) is the lead agency and liaison with cellular providers and is responsible for permitting small cell facilities within District rights-of-way. Further, DDOT has entered into a master license agreement with several cellular companies that are planning to deploy this small cell infrastructure throughout the District. DDOT had developed small cell guidelines to inform the placement of these small cell facilities through specific criteria related to context, location and aesthetics.

The Commission reviewed the draft guidelines most recently in December 2018, and provided comments to DDOT for consideration, including a map of proposed locations for small cell facilities for certain areas and streets in and around the federal core. The guidelines have been revised to include the map, as well as to address much of the feedback NCPC has provided. This report highlights the changes that have occurred following the Commission's last review.

With a growing demand for wireless technology across the country, cellular companies are working to relieve the congestion on existing networks. Cellular providers (or carriers) have begun deploying small cell infrastructure, a new lower-powered antenna technology, to reduce data traffic loads on roof mounted equipment and larger cell towers. This new technology requires significant infrastructure that will potentially affect the aesthetics and function of public streets and spaces. There are multiple applications for this infrastructure, such as attaching to existing streetlights and utility poles, or employing standalone pole installations. Therefore, the design and placement of this infrastructure is critically important, and the guidelines are intended to address these issues.

KEY INFORMATION

- Small cell technology consists of antennas and related equipment that can be placed on structures such as streetlights, the sides of buildings, or poles. Small cell equipment comes in various sizes, and are essential for transmitting data to and from a wireless device.
- DDOT has entered into a master license agreement with several cellular companies (carriers) that are planning to deploy small cell infrastructure throughout the District.
- Small cell antennas have a limited signal range, and each provider may install hundreds of antennas and related equipment throughout the District to meet their independent coverage needs.
- The carriers have indicated they would like to install approximately 2,700 facilities within the District over the next five years.
- According to the carriers, the density of antennas correlates with the intensity of use for a given area.
- DDOT has worked with NCPC and other District and federal agencies to develop draft guidelines that address various aspects of the placement and design of small cell facilities.
- The draft guidelines currently prohibit placement of small cell facilities adjacent to National Park Service reservations.
- The guidelines would not apply to small cell facilities proposed on federal property. Any proposed facilities on federal land within the District of Columbia would require submission by the land-holding federal agency to NCPC for review and approval.
- The District of Columbia Public Space Committee will ultimately adopt the guidelines that will be used to evaluate permit applications for small cell installation in District rights-of-way and on District assets, such as light poles.

RECOMMENDATION

The Commission:

Thanks the District Department of Transportation for incorporating the recommendations of the Commission and for working with NCPC staff on this complex and important effort.

Notes the revised guidelines incorporate the *Federal Core Interest Area* map, as adopted by the Commission, that identifies the permissible locations for small cell facilities on District rights-of-way in the areas of highest federal interest around the National Mall.

Notes that outside of the *Federal Core Interest Area* map, small cell infrastructure is not allowed in the right-of-way adjacent to federal reservations.

Notes NCPC staff have initiated coordination with the National Park Service and the Smithsonian Institution in evaluating coverage needs and potential solutions that include the National Mall, Constitution and Independence Avenues over the next six months. No facilities will be permitted

along Constitution or Independence Avenues until a more comprehensive evaluation of coverage needs and facilities placement can be developed for this area.

Notes DDOT will work with NCPC, the U.S. Commission of Fine Arts, other District agencies and carriers over the next six months to develop a design or standard for standalone poles. In the meantime, small cell facilities will be limited to attachments to existing poles.

Notes the revised guidelines include a fifty percent reduction in allowable density of small cell facilities per block face across the entire District, as compared to the previous draft. This reduction is consistent with analysis and recommendations that NCPC developed in its analysis of the federal core.

Notes NCPC staff will continue to work with DDOT to address details regarding consistency and clarity throughout the document.

PROJECT REVIEW TIMELINE

Previous actions	July 2018 – Information Presentation November 2018 – Review of draft guidelines December 2018 – Review of draft guidelines
Remaining actions (anticipated)	– Updates on pole design process and siting around the National Mall

PROJECT ANALYSIS

Executive Summary

The Commission reviewed the draft guidelines most recently in December 2018, and provided comments to DDOT for consideration, including a map of proposed locations for small cell facilities for certain areas and streets in and around the federal core. The guidelines have been revised to include the map, as well as to address much of the feedback NCPC has provided. As such, staff recommends the **Commission thank the District Department of Transportation for incorporating the recommendations of the Commission and for working with staff on this complex and important effort.** This report highlights the changes that have occurred following the Commission's last review.

Analysis

Federal Core Interest Area

Previously, the Commission had advised 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 could be used to reconcile coverage needs and impacts to the public realm, particularly if it was determined that additional coverage was needed for the area. Although excluding standalone poles adjacent to federal buildings and national parks might protect these resources, it would not ensure adequate coverage at these locations, which is also an important goal. Staff prepared the map of facility locations, and the Commission adopted the map and requested DDOT include it in the guidelines. The revised guidelines have been revised to include the *Federal Core Interest Area Map* which permits some small cell facilities in areas where they were previously restricted.

Areas around the National Mall

Previously, the Commission had directed staff to coordinate with the National Park Service, the Smithsonian 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. No facilities will be permitted along Constitution or Independence Avenues until a more comprehensive evaluation of coverage needs and facilities placement can be developed for this area. NCPC staff has begun the coordinating effort with partner agencies and will report back to the Commission over the next six months.

Review Process

As a reminder, 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.

Consistent with the Commission's previous request, the guidelines have been updated to reflect that any facility location identified on the *Federal Core Interest Area Map* will not need further NCPC review. If a carrier seeks an exception from the guidelines within the streets identified on the Map, or adjacent to any federal property, the exception request will necessitate NCPC review and concurrence prior to the initiation of permit review by DDOT. Further, 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. Again, these changes are all consistent with the Commission's recommendations.

Infrastructure Design

The guidelines have also been updated to indicate that no new standalone poles will be installed until new design standards have been finalized and approved. This aligns with the process that was previously described to the Commission. DDOT will work with NCPC, the U.S. Commission of Fine Arts, other District agencies and carriers over the next six months to develop a design or standard for standalone poles. In the meantime, small cell facilities would be limited to attachments to existing poles. The Commission had previously expressed support for such a process and found that the development of a unified standalone pole design will be beneficial to the District of Columbia and could be an example to other cities. Parallel to this, no ground level cabinetry will be permitted until design standards for this component of the infrastructure have been developed and adopted.

Other Comments

NCPC staff provided additional comments to DDOT for inclusion in the guidelines, consistent with the Commission's previous comments. A majority have been addressed throughout the document. Consistent with these comments, the guidelines have clarified where facilities are not permitted, particularly adjacent to federal reservations under the jurisdiction of the U.S. government, outside of the *Federal Core Interest Area* map. New guidelines regarding the placement of facilities in relationship to buildings, building architecture, and open spaces have also been added. Other clarifying guidelines regarding the placement of new poles and other components of the streetscape, including protecting trees, were also included.

The Commission had previously suggested encouraging hoteling to reduce the number of facilities, and therefore minimize the number of new elements proposed within the public realm. Perhaps the most significant change to the guidelines is the fifty percent reduction in allowable density of small cell facilities per block face across the entire District. This reduction is consistent with analysis and recommendations that NCPC developed in its analysis of the federal core. While hoteling is not explicitly required, this reduction may help promote hoteling or colocation.

In general, a majority of the comments and recommendations made by NCPC have been incorporated into the latest draft of the guidelines. NCPC staff will continue to work with DDOT to address details regarding consistency and clarity throughout the document. Additional revisions may occur prior to final adoption by the Public Space Committee.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

As noted above, the planning comments are designed to ensure the proposal meets basic goals of the Comprehensive Plan. Staff has primarily relied upon the policies related to Urban Design, Historic Preservation and Visitors and Commemoration in evaluating the proposed guidelines.

National Historic Preservation Act

NCPC does not have an independent responsibility to comply with the National Historic Preservation Act when providing comments on the guidelines.

National Environmental Policy Act

NCPC does not have an independent responsibility to comply with the National Environmental Policy Act when providing comments on the guidelines.

CONSULTATION

Coordinating Committee

The Coordinating Committee last reviewed the draft guidelines at their November 14, 2018 meeting. At that time, the Committee forwarded the proposed guidelines to the Commission with the statement that the proposal has been coordinated with all participating agencies.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Arts reviewed the draft guidelines at their July 19, 2018 and September 13, 2018 meetings. NCPC staff have continued to work with CFA and DDOT regarding potential options for designing new small cell infrastructure.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Draft Guidelines - <https://ddot.dc.gov/smallcell>

Prepared by Matthew Flis
02/27/2019

ATTACHMENTS

- Powerpoint

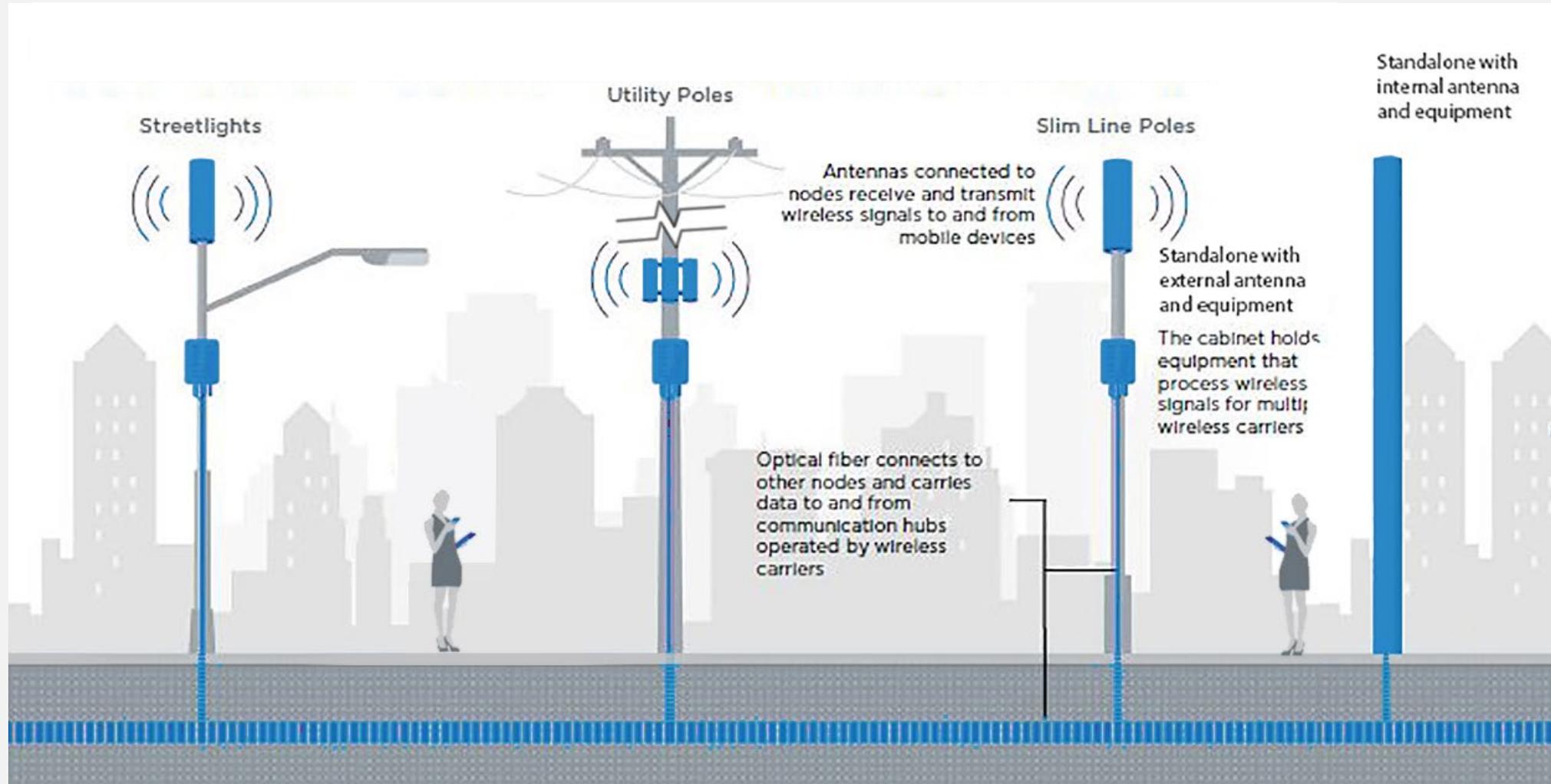
Small Cell Infrastructure Guidelines

Washington, DC

Approval of Final Comments on Draft Guidelines

District of Columbia Department of Transportation

What is small cell technology & what does it look like?

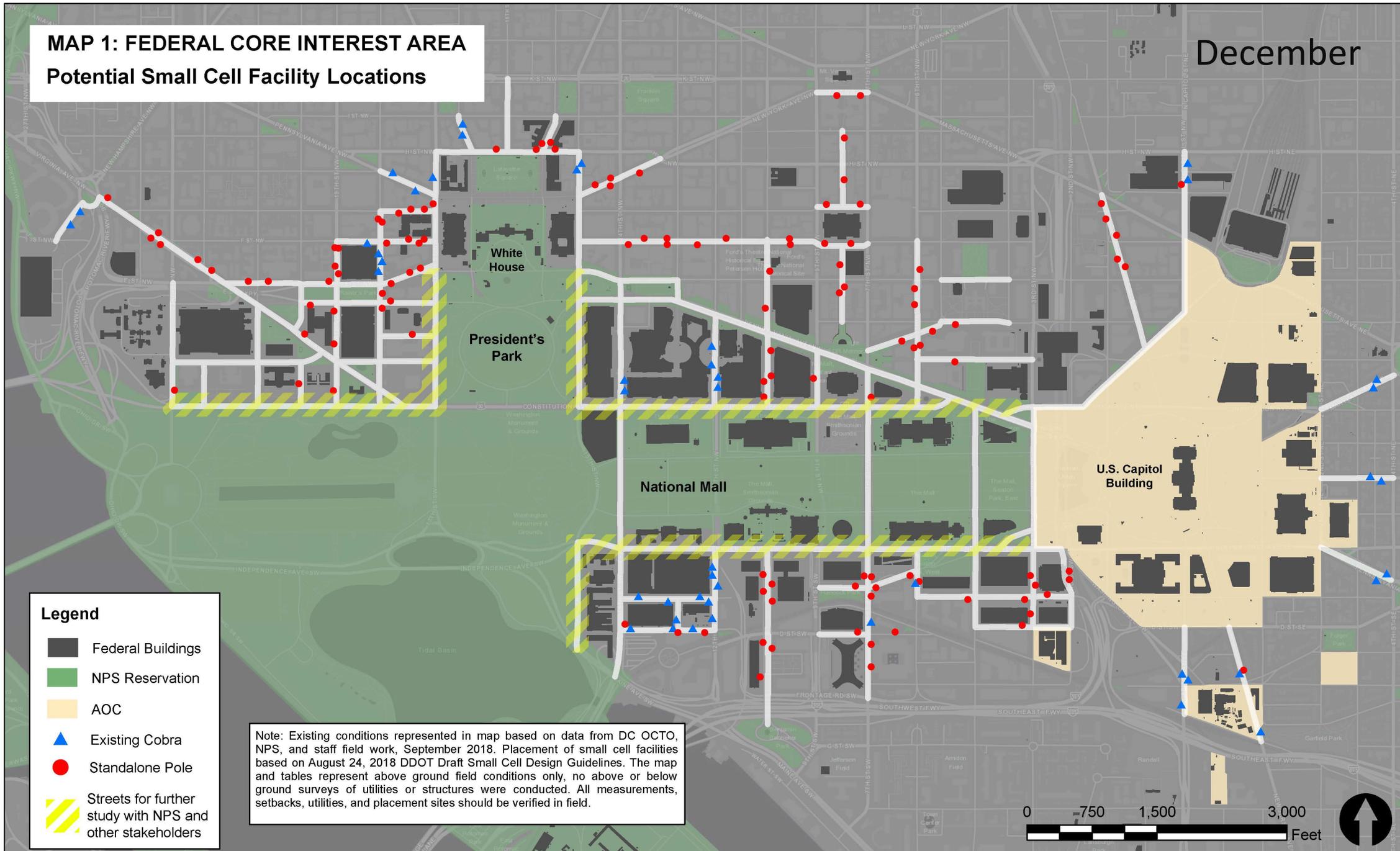


Areas of Federal Interest



**MAP 1: FEDERAL CORE INTEREST AREA
Potential Small Cell Facility Locations**

December

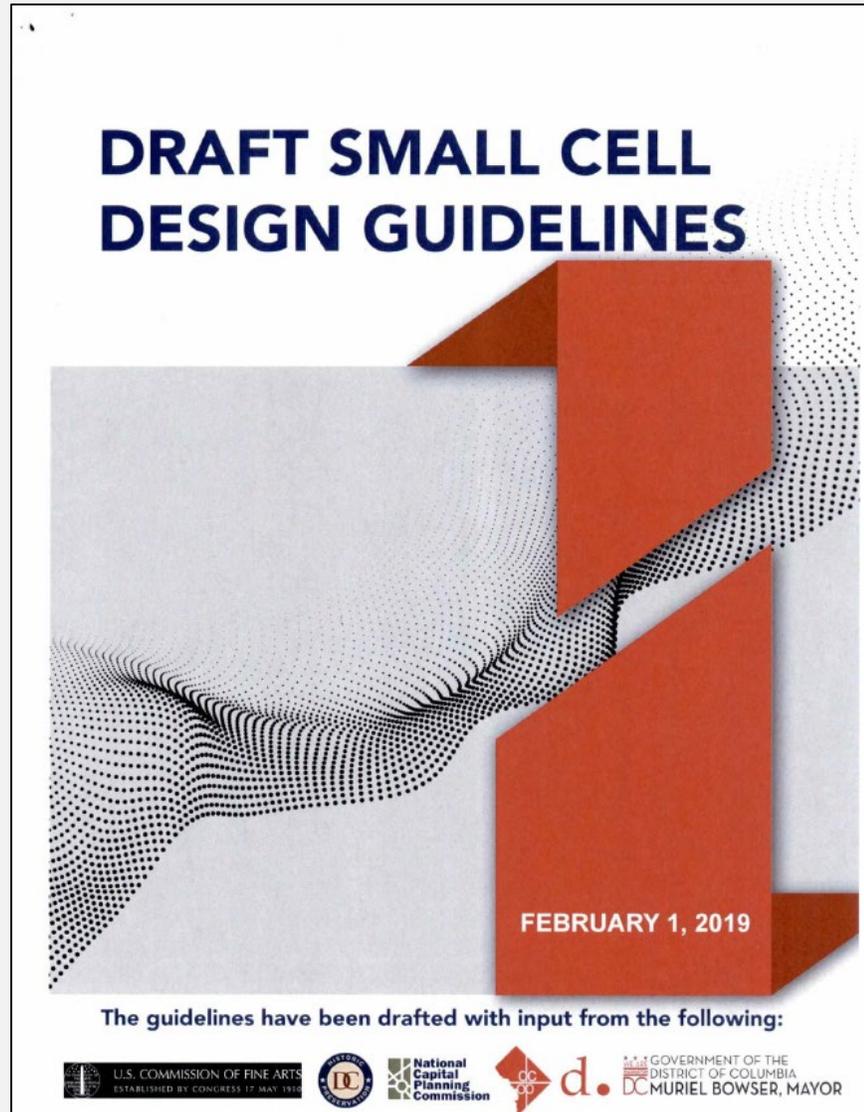


- Legend**
- Federal Buildings
 - NPS Reservation
 - AOC
 - Existing Cobra
 - Standalone Pole
 - Streets for further study with NPS and other stakeholders

Note: Existing conditions represented in map based on data from DC OCTO, NPS, and staff field work, September 2018. Placement of small cell facilities based on August 24, 2018 DDOT Draft Small Cell Design Guidelines. The map and tables represent above ground field conditions only, no above or below ground surveys of utilities or structures were conducted. All measurements, setbacks, utilities, and placement sites should be verified in field.



Revised Draft Guidelines – February 2019



DRAFT SMALL CELL DESIGN GUIDELINES
2/1/2019

TABLE OF CONTENTS

- 1. Background**
- 2. Adoption**
- 3. Purpose**
 - 3.1.1. Goals of the Guidelines
 - 3.1.2. The Monumental Core
- 4. Review Process**
 - 4.1.1. Master License Agreement
 - 4.1.2. Public Space Permits
- 5. General Guidelines**
 - 5.1.1. General limits: Locations
 - 5.1.2. General limits: Preference for Locations and Methods
 - 5.1.3. General limits: Appearance
 - 5.1.4. General limits: Adherence to Other Applicable Standards
 - 5.1.5. General Parameters on Installations: Types, Locations, and Frequency
- 6. Guidelines regarding Areas of Special Interest**
 - 6.1.1. Historic Districts and Landmarked Properties
 - 6.1.2. Areas of Federal Interest
- 7. Guidelines regarding DDOT Streetlights**
- 8. Guidelines regarding New Standalone Poles**
 - 8.1.1. Appearance
 - 8.1.2. Pedestrian Path and Amenity zone
 - 8.1.3. Access, Circulation, and Sight Distances
 - 8.1.4. Spacing among Streetscape Elements
- 9. Guidelines regarding Existing Utility Poles**
- 10. Glossary**

Ver. 2 02/01/2019 Page 1

Focus Areas

- Federal Core Interest Area Map
- Review Process
- Infrastructure Design
- Other Guidelines