

Report on NCPC Information Presentation on Small Cell Infrastructure, File No. 7994

Thursday, July 12, 2018 – 4 p.m.

By C100 HP Subcommittee member Rick Busch

The presentation was made by Michael Bello, Physical Planning Division, DC Office of Planning (I think). Its title, “Small Cell Infrastructure,” sounds non-threatening. It is not.

The Project

The project will see installation of 4-foot long by 18-inch wide hardware for wireless access points throughout the District of Columbia for current 4G voice connections, with upgrades to 5G in the future. The purpose is to achieve seamless integration of wireless systems in DC with much higher speeds. The presenter indicated that this is new low power technology, with the ability to share graphics. Under the current plan AT&T, T-Mobile, and Verizon will each be installing their own individual hardware either on existing utility poles or new ones. The DC Department of Transportation (D dot) is the lead organization on this project, with the DC Public Space Committee (under D dot), approving the final installation plan, which includes design guidelines, and issuing permits.

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Presentation Content

The presentation was fast-paced so I may not have gotten all the elements and gotten everything correctly. Once the OP person completed his presentation all of the questions went to Ms. Roos in her role as project leader. She claimed that D dot understands the unique situation of the District of Columbia as our nation’s capital.

- The new hardware must be installed every 250 to 300 feet to work effectively. This could result in the installation of thousands of new utility poles District-wide. (Tom Luebke of the US Commission of Fine Arts has already indicated that the hardware cannot be installed on existing street lamp poles in the federal enclave.)
- The new equipment will be installed in the public right-of-way.
- The installation project is not subject to NEPA review.
- In addition to D dot, the DC Office of Planning, the National Park Service, the US Commission of Fine Arts (CFA), the National Capital Planning Commission (NCPC), and the DC State Historic Preservation Office are all working on design guidelines for the new equipment. D dot’s Public Space Committee has final approval of designs after a 30-day review period by the city’s

Advisory Neighbor Commissions. The DC Office of Science and Technology also has a role in this project, but I'm uncertain what this is and where it fits.

- Federal Communications Commission (FCC) regulations give the communication industry wide latitude in determining what will be installed and where it will go. (This point was challenged by NCPC's attorney, who indicated that state and local regulations must be met by the carriers.)
- NCPC will review all installations on federal lands.
- Nothing said about the impact on DC's many historic districts. (Busch observation)
- Nothing said about the fact that so much of utility lines in the central city are underground. If all these proposed installations have to be above ground, what's the impact? (Busch observation)
- CFA will receive and information presentation on this topic on Thursday, July 19, starting at 9 a.m.
- NCPC doesn't meet again until September.

Commissioners Questions and Comments

What is DC's role in developing this infrastructure? (Eric Shaw, D/OP) Design guidelines are being developed by the city agencies mentioned above. They are to be ready before the end of September and will be sent to the Advisory Neighborhood Commissions city wide for comments due back in 30 days. Then they go to the D dot Public Space Committee for review and approval. DC Council also has an approval role somewhere in this process.

What other cities in the US are using this hardware? (Shaw) Denver, Berkeley, San Diego, San Francisco, many others mentioned.

How will this hardware look in DC? (Shaw) D dot needs to develop renderings that look like the DC federal, business districts, and neighborhood skylines, not something that looks like New York City.

Who's the design arbitrator? (Mina Wright – GSA) (After the meeting I overheard the NCPC chair say to an ANC commissioner from Georgetown who was present, that design review and arbitration could not be left to D dot.)

How can there be no NEPA review? (Wright) This is when the NCPC attorney jumped in and indicated that state and local regulations must be followed.

What are the health and safety implications of the installation? (Wright) No response from the D dot lead.

What's the permit fee and is it for each installation? (Peter May – NPS) The D dot lead indicated that the fee would be modest and will be for each installation. May went on to say that the current situation appears to be very much like the installation of fiber optic cables during the Williams Administration, where each communications company was digging its own trenches in DC streets until they were all made to work together.

May went on to make the following observations:

- Thinking on this project must be about its long-term effect on the District.
- There is a specific need for information on the fee schedule. Consideration should be given to more than just a modest permit fee because carriers will be making money with monthly service charges for all who use their communications equipment.

Addendum

Elsa Santoyo was at the meeting and sought me out during a break in the agenda. She was there in her capacity as Chair of the Citizens Association of Georgetown's (CAG) Historic Preservation and Zoning Committee. She is also a CAG Board Member and a member of the C100. Her contact information is: emsantoyo28@gmail.com; 202.580.9556.

Elsa would like to meet informally with HP Subcommittee members because the response of citizens to this initiative needs to be a uniform one, with one set of uniform guidelines for all companies to use. Right now, D dot's approach is for each communications company to work on its own. Her understanding is that for effective communications the equipment installations will need to be very close. Any trees in the way will have to be removed or trimmed. Using the single utility pole "hotel" approach means that poles will have to be at least 18 inches in diameter to support the equipment. If three carriers have their individual equipment on a single pole, how tall will that pole have to be? (Busch observation)

Rick Busch