

GOVERNMENT OF THE DISTRICT OF COLUMBIA
PUBLIC SPACE COMMITTEE



The Capitol Hill Restoration Society
Attn: Beth Purcell, President
P.O. Box 15264
Washington, DC 20003

May 7, 2021

Via post and email

Dear President Purcell:

Thank you for submitting the February 18, 2021 letter from the Capitol Hill Restoration Society (CHRS) inquiring about installations of Small Cell equipment in the District, pursuant to the Small Cell Guidelines adopted by the Public Space Committee on March 21, 2019. We appreciate the CHRS's mission to "promote, preserve, and enhance the character of [Capitol Hill's] historic neighborhoods." The Public Space Committee (PSC) applied those same values regarding historic neighborhoods in its consideration and adoption of the Small Cell Guidelines. We appreciate the opportunity to discuss this matter with the CHRS. As outlined below, the Small Cell permitting process and the installations cited by the CHRS are consistent with the Small Cell Guidelines.

In its letter, the CHRS expressed concerns that installations on District Department of Transportation (DDOT) streetlights were in violation of Small Cell Guidelines section 5.3.1, which states that, "except for Small Cell Infrastructure attached to wooden poles, Small Cell infrastructure requiring any cabinetry, including pole mounted or ground level, is not to be installed until the cabinetry design has been reviewed and formally adopted by the PSC as part of these guidelines."

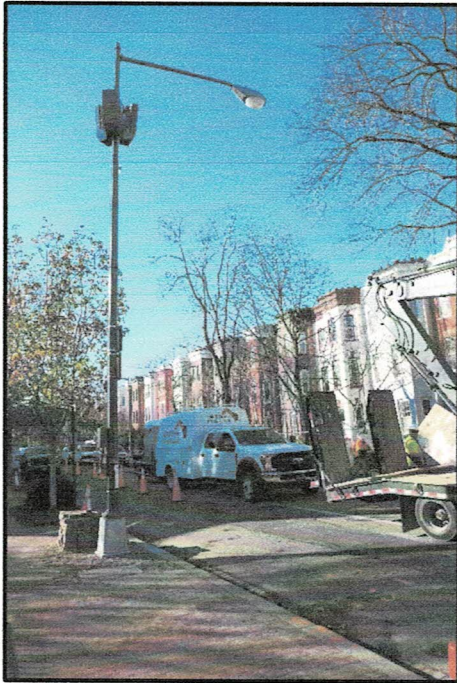
The CHRS noted installations on the 1500 block of T St NW and at 16th and Riggs Pl, NW, that it believes violated this provision. We received a similar inquiry from the Committee of 100 of the Federal City, which included photos of the installation on the 1500 block of T St NW, which are included below. These show the equipment the CHRS is concerned violates section 5.3.1's prohibition on installation of any Small Cell infrastructure "requiring *any cabinetry*" (emphasis added) on anything other than wooden poles.

The installation in question is consistent with the Small Cell Guidelines. The boxes attached to the outside of the streetlight include the wireless service disconnect and the electricity meter. This equipment is not cabinetry in the context of the Small Cell Guidelines. As demonstrated in the photos of a Small Cell installation on a wooden pole on the 2900 block of Garfield St NW, the cabinet referenced in the guidelines is more obtrusive and has a larger visual impact than the standard meter and disconnect boxes shown in the installation on the 1500 block of T St NW.

This differentiation between cabinetry and other equipment is made in Small Cell Guidelines section 5.3.4, which prohibits advertising on "equipment enclosures (boxes, cabinets, etc.)", among other infrastructure. As noted in this provision, there are different types of enclosures, with cabinetry being just one type. Consistent with this provision and section 5.3.1, meter and disconnect equipment boxes of the type and size shown in the installation on the 1500 block of

Public Space Committee
1100 4th St SW, Suite 360
Washington, DC, 20024

T St NW are not cabinets and are not subject to the limitations in 5.3.1. These boxes are consistent with the Small Cell Guidelines requirement that they be “the same color and finish as [the] surrounding streetlight pole.” (Small Cell Guidelines section 5.3.2.)



1500 block of T St streetlight with Small Cell installation



Close up of the meter and disconnect boxes



2900 block of Garfield St NW with Small Cell installation



Close up of the cabinet, meter and disconnect box

There are a variety of equipment included in a Small Cell installation, such as antennae, meters, load panels, disconnects, and cabling. In the case of wooden poles, all of these materials must be installed on the outside. In the case of DDOT streetlights, some of the most conspicuous and largest items have been engineered to be contained in the pole's interior. For comparison, the photos at the bottom of Page 2 show the installation of Small Cell equipment on a wooden pole. The one on the right provides a close up of the cabinetry, the service disconnect, and the meter boxes. Small Cell Guideline section 5.3.1 applies specifically to the large cabinet and not to the disconnect and meter boxes.

Stand Alone Pole and Cabinetry Design Review Process

The cabinetry review process, which is a component of the stand-alone pole design process, has not been completed. It has been put on hold to allow MLA holders to revise their proposed equipment. The MLA holders have not reached out to DDOT to restart the process. When it restarts, and after the initial review process is completed, DDOT and the Public Space Committee will reach out to the public, including external stakeholders such as the CHRS and others who have expressed interest in Small Cell designs, to solicit input and recommendations before a final design is adopted. Similar to the process where the Small Cell Guidelines were adopted, the final design will be adopted at a public meeting where all parties will have the opportunity to present their recommendations on the record and in discussion with the Public Space Committee.

We appreciate the CHRS reaching out about this matter and look forward to continuing our dialogue about this important initiative.

Sincerely,



Matthew J. Marcou, Chair

Public Space Committee

Cc (email only):

Kathryn Roos, Deputy Chief Operations Officer, DDOT
Jonathan Rogers, Manager, Planning and Sustainability Division, DDOT
Elliott Garrett, Public Space Committee Executive Secretary
Glenn Dubin, Office of the General Counsel, DDOT
Councilmember Charles Allen
Matthew Flis, National Capital Planning Commission
David Maloney, State Historic Preservation Office

Public Space Committee
1100 4th St SW, Suite 360
Washington, DC, 20024