



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown, and Hillandale

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October 3, 2018

Mr. Matthew Marcou
Chair, Public Space Committee
District Department of Transportation
1100 4th Street SW, Third Floor
Washington, DC 20004
PublicSpace.Committee@dc.gov

RE: The DC Government's Draft Small Cell Design Guidelines

Dear Chair Marcou,

On October 1, 2018 ANC 2E held its regularly scheduled public meeting, which was properly noticed and attended by seven commissioners, constituting a quorum. At this meeting the Commission adopted the following resolution by a vote of (6-0-0*) with regard to the above-referenced matter:

ANC 2E supports the DC Government's advocacy of broadband infrastructure deployment with the goal of ensuring that residents, businesses, and public safety operations in DC have reliable access to wireless telecommunications network technology and state-of-the-art mobile broadband communication services.

ANC 2E advises the Public Space Committee that before the Draft Small Cell Design Guidelines are adopted, DC's Urban Forestry Advisory Council should be asked to render an opinion or provide commentary on the possible effects of small cell deployment on the District's tree canopy goals. Furthermore, the proposed guidelines should be submitted to the Historic Preservation Review Board (HPRB), the U.S. Commission of Fine Arts (CFA), and the National Capital Planning Commission (NCPC) for full reviews within their jurisdictional authority and a vote.

ANC 2E advises the Public Space Committee that ANC 2E requests that the committee incorporate the following into the Draft Small Cell Design Guidelines:

1. A full scale mock-up of small cell installations by each carrier should be constructed for review, comments, and CFA approval prior to consideration of initial applications for Georgetown.

COMMISSIONERS:

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|---------------------------|----------------------------|-------------------------|
| Ed Solomon, District 1 | Joe Gibbons, District 2 | Rick Murphy, District 3 |
| Lisa Palmer, District 5 | Jim Wilcox, District 6 | |
| Monica Roaché, District 7 | Zac Schroepfer, District 8 | |

2. The size, color, diameter, and finish of all small cell equipment, including antennas, antenna-related equipment, cabinets, shrouds, and conduit (no exposed wiring), should be specified and mounting hardware should not exceed the dimensions of the approved mock up.
3. The guidelines should require carriers to submit yearly photographs of all small cell installations to ensure compliance.
4. Real-time maps of all actual small cell pole locations should be made publicly available.
5. Real-time maps of all proposed small cell pole locations should be made publicly available.
6. All small cell facilities should be required to perform pre- and post-installation radio frequency emission measurements on a minimum of three selected nodes, yearly, within the small cell system to confirm compliance with Federal Communications Commission (FCC) regulations, as ANC 2E's entire community will be subjected to involuntary radio frequency exposure and this exposure may have negative effects for people with radio frequency emission disabilities or sensitivities.
7. There should be no fans, cooling devices, or back-up generators permitted to be placed on or in small cell facilities or installations.
8. Small cell facilities or installations should be located at intersecting residential property lines.
9. Small cell facilities or installations in residential neighborhoods should be located to reduce any obstructions to property sight lines as much as possible.
10. When installed in a business, commercial district, and/or mixed-use zoned area, care should be taken to locate the small cell facilities or installations so as to avoid negatively impacting businesses. Small cell facilities or installations should not be located in front of storefront windows, sidewalk cafes, outdoor patio seating, primary walkways, primary entrances, or exits, or in such a way that would impede deliveries to the establishment. Small cell facilities or installations should be located between properties as much as possible.
11. The number of poles installed in ANC 2E should be minimized. ANC 2E advises that hoteling should be seriously considered as a requirement and that the maximum numbers of poles per block face that are specified in the guidelines should not be increased.

12. Any additional poles that are installed in ANC 2E should be required to conform to the illustrations set forth in the guidelines, unless any modifications are approved on an individual case-by-case basis by the Public Space Committee, the U.S. Commission of Fine Arts, and the Historic Preservation Review Board.
13. As proposed in the guidelines, and as stressed by members of the U.S. Commission of Fine Arts during its most recent public hearing, the vaults for all poles should be required to be located underground.
14. Should small cell technology become obsolete and/or the pole owners cease conducting business in the District of Columbia, the poles should be removed within 60 days.

ANC 2E advises the Public Space Committee to incorporate, in the current version of the Draft Small Cell Design Guidelines, the Office of the Chief Technology Officer (OCTO) WiFi hardware concept design for the hardware that is proposed to attach to the small cell poles.

ANC 2E advises the Public Space Committee that the following should require a 30-day notice to the affected ANC and the specific single member district commissioner:

1. Any small cell facility installations.
2. All small cell facility maintenance.
3. All small cell facility upgrades.
4. Any location changes to existing small cell facility deployments.

ANC 2E advises the Public Space Committee that any future changes to the Draft Small Cell Design Guidelines should require a 30-day notice to the ANCs and to the public.

ANC 2E advises the Public Space Committee that this resolution has the support of the Citizens Association of Georgetown, the Burleith Citizens Association, the Hillandale Homeowners Association, Trees for Georgetown, Georgetown Main Street, the Georgetown Business Improvement District, and the Georgetown Business Association.

ANC 2E advises the Public Space Committee to incorporate the recommendations contained in this resolution into the revised Draft Small Cell Design Guidelines and to then hold public hearings for community input as soon as possible.

Commissioners Jim Wilcox (2E06@anc.dc.gov) and Joe Gibbons (2E02@anc.dc.gov) are the Commission's representatives in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe Gibbons". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joe Gibbons
Chair, ANC 2E

* Commissioner Zac Schroepfer recused himself from voting on this matter.