

**From:** [Tind Shepper Ryen](#)  
**To:** [Preservation](#); [Lia Niebauer](#)  
**Subject:** [EXTERNAL]4/22 Updated Small Cell Policy  
**Date:** Wednesday, April 22, 2020 1:18:17 PM

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Dear Board of Architectural Review and Board Staff:

I'm writing to urge you to define requirements for the location of replacement poles in criteria #7 of the April 22 draft of the small cell policy. Specifically, the draft currently states that, "any replacement for an existing pole will be in the same general location as the existing pole" without further limitation. Because a "general location" may be broadly interpreted, this allows new utility poles to be sited wherever the contractor chooses and deprives the Board and residents of information needed to assess the project.

For example, the draft policy would allow installation of a new utility pole dozens or even hundreds of feet from the current site. There is no need to grant such broad latitude to applicants. Existing utilities, such as residential water or gas lines, or nearby planted trees may prevent digging in the area immediately adjacent to the current pole. However, these types of obstacles can and should be assessed by the applicant prior to applying. Further, there is no need to allow significant changes to pole locations at the mere convenience of the contractor performing the installation.

I urge you to amend the policy to ensure that the Board and its staff know where a replacement pole will be placed prior to approval. They should be placed within a small, specified distance to receive administrative approval. More significant changes should require approval by the full Board and property owners adjacent to the new pole locations should be notified.

Regards,  
Tind Shepper Ryen

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*Old Town Civic Association*  
*P.O. Box 1213*  
*Alexandria Virginia 22313*

April 22, 2020

Subject: OTCA Comments regarding BAR Docket Item #2 Policy for Administrative Approval of Small Cell Wireless Facilities on Utility Poles in the Right-of-Way

Dear Chairman Roberts and Members of the Board of Architectural:

On behalf of the Old Town Civic Association, I submit the following recommendations, comments, and questions regarding the Policy for Administrative Approval of Small Cell Wireless Facilities on Utility Poles in the Right-of-Way:

1. Cell antennae should be mounted as close as possible to the pole, rather than project outward, thereby increasing the cross section and visual size of the antennae.
2. We support Staff's recommendation, as we understand it, to reduce permissible small cell antenna volume from 6 cubic feet to 3 cubic feet.
3. We recommend that the policy include the following underlined text added to staff's recommendation that the volume of "All other equipment on the pole be the smallest volume practicable to serve the intended purpose and cannot exceed 28 cubic feet."
4. We recommend that the policy direct that, to the extent feasible, equipment and control boxes be mounted to the sides of the poles, between the curb and pedestrian path, rather than toward the buildings and over the pedestrian path, or toward the street where the boxes would be more visible. Equipment should also be mounted on the sides of poles away from street intersections, alleys and driveways that would make the equipment more prominently visible.
5. In addition to the policy, with which we agree, that poles not be placed in front of the City's most important historic buildings, we recommend that poles also be located so as to minimize the potential negative impacts of cell antenna poles on all historic resources in the City. For example, poles should be placed on what would be the extended property line between buildings, and should avoid being placed immediately in front of townhomes, especially front doors, bay windows and other features to the extent possible. Note that this careful placement was not done for all of the consolidated parking meters that were installed

in the historic district, sometimes resulting in meter placement directly in front of historic townhome front doors and other features.

6. We oppose increasing pole height beyond the 50 foot height limit that exists in the historic district, and that would sometimes be double the height of the adjacent historic townhouses. Does staff and/or the BAR have the authority to increase pole height above the 50 foot Historic District height limit, to the 55 feet pole height mentioned in the Staff Memo, or carriers proposing to increase pole height to 55 feet require Planning Commission and/or City Council, or Board of Zoning Appeals approval?
7. Old Town Civic Association supports the following guidelines in the policy proposed by staff that:
  - a. Antennas are painted to match the adjoining pole and minimize visual clutter.
  - b. Wireless equipment is painted to match the pole.
  - c. No separate ground mounted equipment is proposed.
  - d. Any replacement poles be located as close as possible to existing poles, unless the pole could be relocated to eliminate conflicts with historic buildings and features.
  - e. Replacement of a pole not cause removal or damage of an existing tree, and also recommend to the extent possible, poles not be located in a manner to preclude planting a future street tree.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Milone". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Milone

President, Old Town Civic Association