



Crown Castle
200 Spectrum Center Drive
Suite 1800
Irvine, CA 92618

February 26, 2019

City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

RE: Agenda Item 6e from Hermosa Beach's 2/26/2019 City Council Meeting - Crown Castle's Comments to Hermosa Beach's Small Wireless Facilities in the ROW Design Guidelines

Dear Mayor and Honorable City Council Members,

Thank you for the opportunity to provide comments on the new City Design Guidelines for wireless facilities in the Public Right of Way of Hermosa Beach.

Crown Castle applauds the City in its efforts in adopt design guidelines that provide city staff with standards to approve these facilities in the ROW. We appreciate the work on design guidelines that provide both the city and the industry with certainty on designs so that the industry, to the best of its ability, can propose and build Small Wireless facilities that are acceptable to the community.

In our review of the city's draft design guideless, we have noted the following concerns:

Resolution Establishing Design and Development Standards

Design Standards

1) § 4 (a)(3). Requiring undergrounding where "feasible", without defining feasibility is ambiguous, and contrary to FCC 18-133 that require guideless to be objective. Additionally in many situations to underground radio equipment will result in more significant impacts than the alternative design because of noise and visual impacts related to the cooling and venting of the underground facilities. Additionally, requiring undergrounding may be discriminatory in areas where other utilities are not currently undergrounded. For this reason, we suggest that the City remove the undergrounding portions of this section, or if not, define "feasible" to allow staff to provide an unbiased analysis of proposed facilities.

2) § 4 (b)(5)

The outright prohibition of Small Cell facilities in the Strand and the Pier Plaza could result in a prohibition of services. We highly recommend that their prohibition in these areas be eliminated to

comply with federal law and FCC regulations. Instead, the city could make placement of facilities in these locations a least desired option. The Strand (the beach) and Pier plaza are locations that desperately need these facilities to provide the coverage and capacity needed in these high traffic areas, and the city should work towards a methodology of providing services to these areas, rather than outright abandoning them, due to prohibiting the provision of services.

3) § 4 (b)(6)

Strand mounted applications are a legitimate choice, and we believe that they represent the least intrusive design for placing wireless facilities in the ROW. In fact, the local cable company has installed many Wi-Fi routers (the same type of devices) on their overhead cable throughout the city. They are extremely small and blend into the urban vertical environment. Crown Castle has built almost 2,000 of these facilities in the city of Los Angeles, with zero complaints received. Below I have included an example photo of a strand mounted wireless facility. As you can see, it is extremely small and unobtrusive. We highly suggest that the city review more of these types of installations to make a determination that these types of facilities are optimal.



Additionally, the outright prohibition of these types of facilities could result in a prohibition of services, in violation of federal law and FCC regulations. While the city's design guidelines allow for the placement of facilities on certain city owned and third party light poles (SCE Owned), utility poles and new poles, there are instances in which none of these options would work for various reasons. In this scenario, not allowing a strand mounted facility could result in a prohibition of our services in violation of federal law. We recommend that the city eliminate their prohibition, and instead make it at least a least desired, but still viable, option.

4) § 5 (b)(1) Requiring that antennas be installed in a pole top shroud to be of a tubular/cylindrical form factor no wider than the pole, severely limits the ability of wireless providers and infrastructure companies to deploy their needed infrastructure. If this portion of the design guidelines is kept in place, one of two things will happen. First, applicants will install wider poles than necessary simply to fall within this requirement. Secondly, applicants will repeatedly need to ask for exemptions from the code. Instead, the City should allow for antennas and equipment shrouds to be larger than the diameter of the pole. Our suggestion is that the city allow for up to an 18" diameter shroud.

Additionally base shrouds and shrouds mounted to the side of light poles are a legitimate choice of design, and we believe that they could be the least intrusive means possible of placing wireless facilities in the ROW, if other more preferred options are unavailable. We highly suggest that the City review more of these types of installations to make a determination that these types of facilities are optimal. Even if the City decides that these options are less desirable than only a pole top mounted facility, it should still allow for these types of facilities as a lesser desired option, to be selected when other configurations are not viable, as opposed prohibiting them in violation of federal law and FCC regulations.

Additionally, the outright prohibition of these types of facilities could result in a prohibition of services. While the city's design guidelines allow for the placement of facilities on certain city owned and third party light poles (SCE Owned), utility poles and new poles, there are instances in which none of these options would work due to various reasons. In this scenario, not allowing for the option of base shrouds, shrouds mounted to the side of light poles and shrouds larger than the diameter of the pole could result in a prohibition of our services in violation of federal law. We recommend that the City eliminate their prohibition from the proposed design guidelines.

5) § 5(c)(2)(d)

This section states that "Wide offsets (more than 4 inches) of equipment enclosure brackets from the pole are prohibited." That currently complies with GO-95 requirements. However, those GO-95 periodically requirements change. We recommend making the following change, "Wide offsets (more than 4 inches) of equipment enclosure brackets from the pole are prohibited, unless otherwise

required by state or federal regulations.” This would make it clear to the reviewer that if regulations change, such as GO-95, the state regulations prevail in a conflict.

Recommendation

It is our recommendation that the City integrate the above comments into their design guidelines. Despite the fact that the city reached out to us for comments, we also recommend that the City hold a stakeholder’s workshop to provide all interested parties the needed opportunity to clearly and transparently to share their views on these design guidelines and their effects on the community before adoption by council.

Respectfully,

Michael Cintron

Government Relations, Network Real Estate

E: m.cintron@sure-site.com | M: 310-701-5780