

Lisa Natusch

From: [REDACTED]
Sent: Thursday, June 3, 2021 3:57 PM
To: Ann Ritzma; Al Royse; Christine Kroluk; Marie Chuang; Sophie Cole; Larry May
Cc: Wireless Comments; Christopher Diaz; Lisa Natusch
Subject: PLEASE READ - Public comment for special meeting of Town Council on 6/3/21 regarding cell tower applications

Importance: High

Mayor / Town Council,

I am writing in opposition of the 8 proposed monopoles under applications H05M2, H07M2, H08M2, H19M3, H20M3, H21M3, H28M3, H31M2. They are in violation of the equipment volume and cabinet standards as defined in the wireless design standards policy 19-01 and should be denied.

Violations of Policy 19-01 section C3:

These proposed monopoles call for separate ground-based cabinets to contain a PGE meter and disconnect. As a result, they fail to comply with **Policy 19-01 section C3**: “the applicant may install a metal or composite decorative pole capable of **concealing all the accessory equipment** either within the pole or within an enclosure integrated into the base of the pole.”

During the 6/1 hearing I pointed out that PGE’s Greenbook Utility Bulletin: TD-027911-B004 dated 11/15/19 lays out PGE’s preferred requirements for “SmartPole Meters” to be integrated in monopoles.

(https://www.pge.com/pge_global/common/pdfs/services/building-and-renovation/greenbook-manual-online/TD-027911B-004.pdf) *See figure 1 below.*

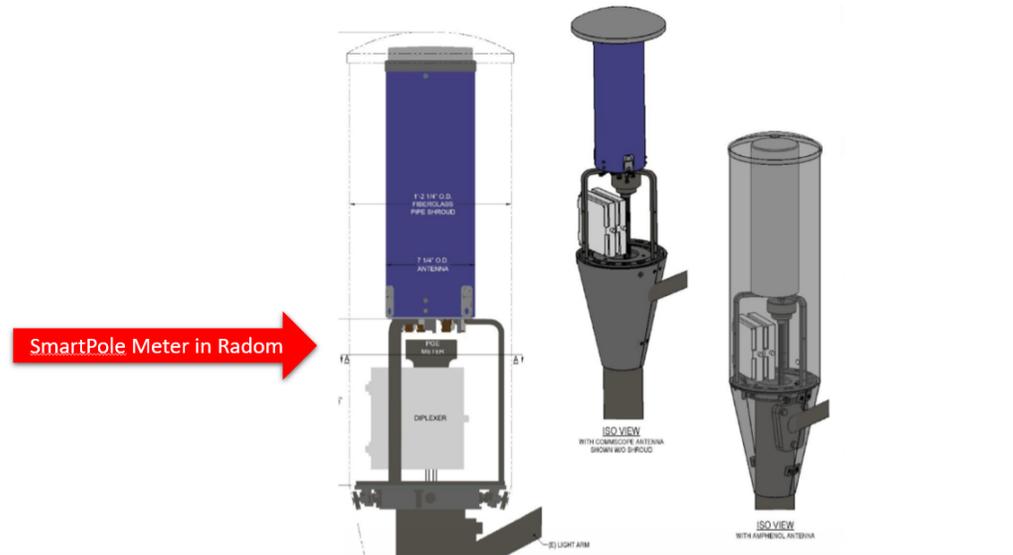
This reference design should be applied to the proposed replacement tower at **H07M2** which has a streetlight and conforms to the requirements in this bulletin.

Crown Castle is trying to avoid co-locating the meter and disconnect in their enclosure so that they don’t have to coordinate with PGE to complete the install or perform maintenance. This request for an exception is opportunistic and is not a technical requirement. Other municipalities also require meter and disconnects to be included in their monopole designs. The Town cannot solely rely on Crown Castle’s assertion that the “only” solution requires a separate equipment cabinet for PGE. I ask that Town Staff contact the following engineering resources at PGE to confirm that the SmartPole Meter may be used on monopoles that don’t have streetlights.

- Daniel Jantz, Engineering Standards Technical Specialist Expert; Electric Distribution Standards 408-365-2206
- Quoc Hoang, Metering Engineer, Senior; Meter Engineering Standards & Technology 415-973-0659

Figure 1: PGE SmartPole Meter located in Radom:

PG&E Metering and Service Connections For Non-PG&E Owned Steel Streetlight Poles With Antenna and Communication Equipment



Violations of Policy 19-01 section G4.a:

In addition, these 8 applications violate **Policy 19-01 section G4.a:** “the equipment base cabinet shall: (a) not exceed 24 inches wide on any side and 48 inches high”.

- This statute limits the dimensions of the base cabinet and defines a volume maximum of 16 cubic feet.
- the applicant is requesting a variance that would allow 30 cubic feet of equipment capacity at 35.7” x 50”.
- This exceeds our equipment volume limit by 14 cubic feet
- Yet the combined total volume of all radios, PSU (power supplies) and ADM units is less than 7cubic feet.
- These leaves approximately **23 cubic feet of excess space not being used**

Crown Castle has not provided (in their applications) the make/model of the monopole or equipment base enclosure they are proposing. The applications should be deemed incomplete until this information is provided so that both the Town’s consultants and residents can review the manufacture specifications and research alternatives. The applications should be deemed incomplete until this information is provided.

Note: Even with this surplus 23 cubic feet of space Crown Castle admitted that they will not support co-location in these towers. (which is another violation of our standards) because they are using the old standard from 2 years ago.

Rebuttal to Effective Prohibition Argument for violation of 19-01 C3 & G4.a

There are numerous technical solutions that can be used to eliminate the need for additional ground-based equipment cabinets and that conform to (or are significantly closer in size) to the equipment base cabinet volume requirements. Below are a few options that are commercially available. There are many more manufacturers and options at Crown Castle’s disposal that would conform to our standards. As a result, there is no risk of Crown Castle winning on a claim of EP if you deny these 8 applications based on the violations I have laid out.

Some currently available monopoles with smaller base cabinets support integrated meter load center and disconnect:

http://www.precision-marketing.com/wp-content/uploads/ConcealFab_ProductGuide_LowRes.pdf

<https://concealfab.com/wp-content/uploads/2020/07/CF-Concealment-Poles-DS-FINAL.pdf>

https://concealfab.com/wp-content/uploads/2020/07/CF_V3-Vertex_Pole_DS_FINAL.pdf

https://concealfab.com/wp-content/uploads/2020/07/CF_V0T-Vertex_Pole_DS_FINAL.pdf

<https://www.commscope.com/globalassets/digizuite/341154-p360-760237427-external.pdf>

<https://www.commscope.com/globalassets/digizuite/914254-p360-760237427xxx26xxx-external.pdf>

Note: There are many others than the small sample listed above

It is your duty to deny the applications that violate our ordinance and design standards. Don't let Crown Castle provide excuses without fact checking them. You have the right to deny on the issue of separate cabinets for PGE as well as equipment volume. They can't win an Effective Prohibition argument on these points since there are commercially available alternatives that have been deployed in other towns across the Country. Many of which have been installed by Crown Castle themselves.

Thank you ,
John Lavrich