



AGENDA RELATED
April 12, 2022
#15 2022-0093

Crown Castle
10301 Meanly Dr.
Suite 200
San Diego, CA 92131

To:
Board of San Diego Port Commissioners
San Diego Unified Port District
Port Administration Building
3165 Pacific Highway
San Diego, CA 92101

March 7, 2022

Sent Electronically

Re: Item 12 WIRELESS COMMUNICATION FACILITIES ON DISTRICT TIDELANDS

Honorable Port Commissioners:

Over the past 18 months, Crown Castle has participated in an industry working group with San Diego Unified Port District staff on the proposed wireless regulations. While Port staff has displayed great professionalism and a willingness to take stakeholder input over dozens of meetings during that period, Crown Castle is not able to support adoption of the draft ordinance at this time.

Our opposition is mainly rooted in an absence of clarity in the draft regulations. Crown Castle deploys in jurisdictions throughout the country, each with nuanced language and requirements, and in most cases, we are able to *support* proposed policy updates. The Port's current draft lacks the specificity and objectivity we need to plan and predictably execute infrastructure deployments. Crown Castle has maintained that the policy's ambiguity is the biggest challenge to predictability, and we have shared this feedback with Port staff and counsel on several occasions. This is in contrast to the Port's member cities, where we are able to incorporate and comply with policy while expanding network capacity. Based on the draft as written, Crown Castle cannot reasonably determine which designs/locations would be approved, which would be subject to the waiver process (which is itself discretionary), and which would be denied.

One stated reason for the challenging development of the policy is the conflicting guidance from the Coastal Commission, however, Coastal Commission representatives were never included in discussions, even as carriers provided examples of successful deployments elsewhere in Coastal jurisdiction.

Wireless connectivity and service has been affirmed time and again as critical to public safety. Robust wireless connectivity supports economic development, visitor experiences, and directly combats the ever-growing digital divide. With mobile data demand increasing by double digit percentages each year, overly restrictive and unclear regulations such as those proposed will stymie crucially needed wireless infrastructure expansions.

Crown Castle is supportive of continuing the conversation and is committed to being a long-term partner to the Port District as the need for next-generation connectivity continues to advance. If adopted, we urge the BPC to revisit this topic in the near future in order to ensure workability of this policy. Again, I thank staff for many long hours, meetings, and conversations.

Sincerely, and on behalf of the San Diego Crown Castle team,

ADRIAN SALAS
Government Affairs Manager
CROWN CASTLE
CrownCastle.com

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