



DEVELOPMENT SERVICES GROUP

9611 SE 36TH ST., MERCER ISLAND, WA 98040

P: (206) 275-7605 F: (206) 275-7725

www.mercergov.org

August 3, 2017

WA-CLEC LLC
c/o Crown Castle
Attn: Chelsea Watson
1505 Westlake Avenue North
Seattle, WA 98109

RE: **Small Cell ROW Use Permit Application(s)**
Reasons for Denial of ROW Use Permits 1701-153 (MIS12), 1701-158 (MIS17), 1701-130 (MIN05)

Dear WA-CLEC LLC:

As noted in the Notices of Decision for the above small cell applications, following review of these applications, the City concluded that the project did not comply with applicable provisions of the franchise agreement, or that the application contained insufficient information to demonstrate compliance. Consequently the City denied these three ROW use permit applications. This letter is intended to provide the reasons for the denial as required by the Telecommunications Act of 1996:

1. Small cell facilities may only be authorized within the City of Mercer Island street right-of-way (ROW) if they comply with the applicable terms of the franchise agreement adopted by Ordinance No. 16-12 and as amended by Ordinance No. 17-18. Insofar as there was insufficient information contained within the application materials, or the small cell facility did not comply with the franchise agreement, the City was obligated to deny the ROW use permit.
2. In the City's January 12, 2017 and April 4, 2017 review letters (attached), MIS12, MIS17, and MIN05 were identified as locations that appeared to result in view impacts, and consequently required more evaluation pursuant to section 6.3.2 of the franchise agreement. Public comments related to all three proposed sites also expressed concerns related to view impacts. The City requested an evaluation of alternative locations to further reduce view impacts:

"Views. Please provide a site specific analysis and documentation of expected view impacts resulting from the alternative site locations discussed in the February 2017 resubmittal. Site specific analysis should include identification of adjacent single family dwellings affected by the alternative location, a photo-realistic rendering of the proposed alternative location, and analysis of other relevant information (e.g. the presence of trees behind the pole that may reduce the visual appearance of proposed small cell facilities). (Item 2, April 4, 2017 City of Mercer Island letter; underline added)"

WA-CLEC, LLC failed to provide information addressing this item. Failure to provide requested documentation is also inconsistent with section 5.1 of the franchise agreement.

3. In the City's January 12, 2017 and April 4, 2017 review letters (attached), the City requested additional coverage information, including for MIS12, MIS17, and MIN05, to aid in evaluating possible alternative locations. Specifically, the City requested:

"Please provide a site specific analysis and documentation of expected coverage impacts resulting from the alternative site locations discussed in the February 2017 resubmittal.

Site specific analysis should include coverage maps that provide for comparison between the proposed location and the alternative locations, along with a summary of coverage goals. (Item 4, April 4, 2017 City of Mercer Island letter; underline added)”

WA-CLEC, LLC failed to provide information addressing this item, in particular any analysis regarding expected impacts and coverage goals. Failure to provide requested documentation is also inconsistent with section 5.1 of the franchise agreement.

Summarizing the above, these three permits were denied because insufficient information was provided by the applicant to demonstrate that possible alternative locations were infeasible, and thus did not comply with the applicable provisions of the franchise agreement. In addition to the review letters, City staff met with representatives of WA-CLEC, LLC on two occasions to discuss, and if needed, further clarify the content of the January 12, 2017 and April 4, 2017 review letters. City staff also visited all three of the sites with representatives of WA-CLEC, LLC and again described the type of factual information and analysis necessary to address the review comments.

Despite multiple requests for the above by the City, representatives of WA-CLEC, LLC requested, in a letter dated May 11, 2017, the issuance of decisions on the permit applications. This request was verbally repeated by WA-CLEC, LLC representatives on June 12, 2017, along with the assertion that there was sufficient information in the file upon which to base the decision. On June 23, 2017, the City indicated in an email to Chelsea Watson (WA-CLEC, LLC) that the City understood that WA-CLEC, LLC was not intending to provide additional information responsive to the above items. Ultimately, following the multiple requests by WA-CLEC, LLC for permit decisions, and to comply with applicable federal law, the City issued its decision on July 31, 2017 based upon the information in the case file.

If you have any questions regarding this letter, please contact me at 206.275.7732 or evan.maxim@mercergov.org.

Regards,



Evan Maxim
Planning Manager
City of Mercer Island Development Services Group
Evan.maxim@mercergov.org
206.275.7732

enc: City of Mercer Island Request for Information, dated January 12, 2017
City of Mercer Island Request for Information, dated April 4, 2017
Alternative Site Analysis by WA-CLEC, LLC for MIN05
Alternative Site Analysis by WA-CLEC, LLC for MIS17
Alternative Site Analysis by WA-CLEC, LLC for MIS 12, with alternative pole coverage map

cc: Richard J. Busch, Busch Law Firm PLLC, VIA EMAIL ONLY
Bio Park, Assistant City Attorney
Kari Sand, City Attorney



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January 12, 2017

WA-CLEC LLC
 c/o Crown Castle
 Attn: Chelsea Watson
 1505 Westlake Avenue North
 Seattle, WA 98109

RE: **Small Cell ROW Use Permit Application(s)**
 Request for Additional Information – MIS01 through MIS24 and MIN01 through MIN15

Dear WA-CLEC LLC:

The City of Mercer Island has received an application for a Right-of-Way (ROW) use permit application that is subject to the Crown Castle Franchise Agreement, signed December 22, 2016.

Following review of the ROW use permit application, the City has determined that the following information is required prior to issuance of a decision. **Please note:** the City cannot complete its review of the above small cell sites until the following items are received.

To expedite the review, the planners have divided the small cell sites up for individual review, however we have an effort to ensure consistency in the review itself. The following table summarizes the review planner assignments – questions regarding specific reviews may be directed to the reviewing planner.

Evan Maxim 206.275.7732		Lauren Anderson 206.275.7704		Nicole Gaudette 206.275.7719		Robin Proebsting 206.275.7717	
MIS04	MIS05	MIN08	MIN09	MIS12	MIS20	MIN07	MIN11
MIS09	MIS16	MIN10	MIN12	MIS24	MIS03	MIS01	MIN01
MIS17	MIS18	MIN14	MIN15	MIS10	MIS11	MIN02	MIN03
MIS19	MIS22	MIS02	MIS06	MIS13	MIS14	MIN04	MIN05
MIS23		MIS07	MIS08	MIS15	MIS21	MIN06	MIN13

Following review of the application and a site visit, the City please address the following:

General:

1. The original applications were submitted in a paper form. The City requires all permit information in a digital format (PDF) prior to permit submittal. Please resubmit the below information, along with the original application material by email to epermittech@mercergov.org. Please note that an individual email is required for each ROW use permit application, and the email should include the ROW use permit number (identified above).
2. Identify the location of the communication space on all the plan sets for all proposed small cell facilities.

3. Section 6.4.6.1 of the Franchise Agreement requires that the small cell facility be painted to match the color of the PSE pole. The application material indicates the pole will be painted a “natural color”. Please specify the proposed color, including the (paint manufacturer name and color). Please also provide a color sample for reference.
4. Please provide a coverage map for Mercer Island.
5. Please provide confirmation that no trees will be cut for any of the proposed small cell facilities. Please add a note to plans indicating that no tree cutting (removal) is proposed.
6. Please specify which small cell facilities will require tree (or other vegetation) pruning. If tree pruning is proposed, please address section 6.3.1 of the Franchise agreement.

Public Comment:

7. The City has received public comments on the proposed small cell facilities, which have been forwarded separately to Crown Castle. Staff can provide an additional copy upon request. Please provide a written response to all public comment in a table that identifies the comment and the small cell site it affects, along with the response by Crown Castle.

Views (Franchise agreement 6.3.2):

8. MIN01: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible; in particular, it appears that the proposed equipment may partially obstruct views. The pole proposed for modification is downslope from houses facing Lake Washington, and may be within the line of sight of upslope properties. Please verify whether there are alternate options for the location of the small cell facility.
9. MIN05: A concern regarding views was raised in a written comment by Joe Coco and Regina Kornfield. Please verify whether there are alternate options for the location of the small cell facility.
10. MIN 08: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. In addition, a nearby citizen (Nancy LaVallee) indicated in her public comment that the proposed pole will impact her view of the mountains and suggests relocating it down the street or on the city owned easement path at 92nd Place. Please evaluate alternate options for the location of the small cell facility.
11. MIN12: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible; in particular it appears that the proposed small cell may impact the view of 4031 96th Ave SE as they are on a slope and the pole is in direct line with the house. Please evaluate alternate options for the location of the small cell facility.
12. MIN13: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. Staff have received multiple written comments regarding the impact of the small cell facility on views. Please verify whether there are alternate options for the location of the small cell facility.
13. MIS02: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible; in particular, the proposed small cell appears to affect the view from a residential structure (presumed bedroom) at 8800 SE 78th St. Please evaluate alternate options for the location of the small cell facility.
14. MIS17: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. Staff have also received public comment regarding the impact of the small cell facility on views. Please evaluate relocating the proposed small cell facility to the SE corner of the intersection of SE 67th Street and 80th Avenue SE, presuming no vegetation or tree removal would be required for such a relocation. If the SE corner is not feasible, please evaluate alternate options for the location of the small cell facility.

15. MIS18: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. Staff have also received numerous public comments regarding the impact of the small cell facility on views. Please evaluate relocating the proposed small cell facility to West Mercer Way to minimize view impacts. If the West Mercer Way is not feasible, please evaluate alternate options for the location of the small cell facility.
16. MIS12: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. The proposed small cell facility may affect the view from 8400 SE 47th Pl. Please evaluate options for the location of the small cell facility.
17. MIS21: Following a site visit, the City has concluded that the proposed facility may not minimize the appearance of small cell facilities from the adjacent residential structure to the maximum extent feasible. Per a request from the adjacent property owner residing at 5033 W Mercer Way and observation of staff, a better location for this facility may be the pole immediately north of the proposed site. Please evaluate options for the location of the small cell facility.
18. For all sites identified in this subsection (Views – items 8 through 18), please provide documentation that the proposed small cell location is necessary to close a significant gap in wireless service. Appropriate information would include both a service coverage map for Mercer Island, and specific evaluation for each of the above locations.

Location Review:

19. MIN04. The proposed small cell site location is not consistent with the locational standards of 6.3.3 of the Franchise agreement. It appears that there is Major, Secondary, or Collector road within 100 feet of the proposed small cell site location. Please provide documentation regarding whether relocation to the closest Major, Secondary, or Collector road will interfere in closing a significant gap. Alternatively please relocate the proposed small cell site to the closest Major, Secondary, or Collector road.
20. MIS16. The proposed small cell site location appears to be located on a private street (not within the City's public right-of-way). Consequently the proposed small cell location cannot be authorized under the franchise agreement or through a right-of-way use permit application. Relocation of the small cell site to a location on West Mercer Way is recommended, in a location where impacts to views will be minimized. Please relocate the proposed small cell facility to West Mercer Way or other alternative location that can be authorized through the franchise agreement.

Site specific comments:

21. Pole top mounting / extension on existing poles - MIN07, MIN01, MIN02, MIS09, MIS10, MIS18, MIS05
 - a. It appears that a pole top mounting is proposed. This is not the preferred design method. Please provide documentation why the existing communication space on the PSE pole cannot be used. (Franchise agreement 6.4.3.1)
 - b. If the antenna can be located in the communication space, please demonstrate that the proposed antenna is flush mounted (Franchise agreement 6.4.6.2)
 - c. If authorized, the franchise agreement limits the size of pole top extensions to a maximum of 48 inches. The proposed extension exceeds 48 inches. Presuming the location is necessary under (the above "a"), please revise the pole top mounting to not exceed 48 inches. Please provide a dimension of the entire pole top facility. (Franchise agreement 6.4.3.2)
 - d. Please note that the equipment cabinet has to be located in the communication space, which is currently not reflected on the plans. (Franchise agreement 6.4.4)
22. Replacement pole with pole top mounting - MIN11, MIS01, MIS12, MIS24, MIN04, MIN06, MIN08, MIN12, MIN14, MIN15, MIS02, MIS03, MIS07, MIS08, MIS11, MIS12, MIS15, MIS16, MIS17, MIS21, MIS22

- a. It appears that a pole top mounting is proposed. This is not the preferred design method. Please provide documentation why the existing communication space on the PSE pole cannot be used. (Franchise agreement 6.4.3.1)
 - b. If the antenna can be located in the communication space, please demonstrate that the proposed antenna is flush mounted (Franchise agreement 6.4.6.2)
 - c. Replacement poles are limited to a height increase of 15% of the original pole, or 10 feet taller, whichever is less. The proposed pole appears to exceed this limit. Please either provide documentation on how the additional height is necessary to close a significant gap or alternatively revise the proposed pole height. (Franchise agreement 6.4.5).
 - d. Please note that the equipment cabinet has to be located in the communication space, which is currently not reflected on the plans. (Franchise agreement 6.4.4).
23. Replacement pole with pole top mounting – MIN03, MIS23
- a. It appears that a pole top mounting is proposed. This is not the preferred design method. Please provide documentation why the existing communication space on the PSE pole cannot be used. (Franchise agreement 6.4.3.1)
 - b. If the antenna can be located in the communication space, please demonstrate that the proposed antenna is flush mounted (Franchise agreement 6.4.6.2)
 - c. Please note that the equipment cabinet has to be located in the communication space, which is currently not reflected on the plans. (Franchise agreement 6.4.4).
24. Antenna on existing pole with no pole top mounting - MIS20, MIN05, MIN09, MIN10, MIN13, MIS04, MIS06, MIS13, MIS14, MIS19
- a. Please note that the equipment cabinet has to be located in the communication space, which is currently not reflected on the plans. (Franchise agreement 6.4.4)
 - b. Please note that the antenna should be located in the communication space, which is currently not reflected on the plans. Please identify the communication space on the plans. (Franchise agreement 6.4.3.1)
 - c. Please note that the flush mounted antennas should be 5 inches or less from the pole. Please add a note indicating that the antenna will be within 5 inches of the pole (Franchise agreement 1.2).

Please coordinate the re-submittal of the above ROW use permit information with Andrea Larson at 206.275.7791 or at andrea.larson@mercergov.org.

If you have any questions regarding this letter, please contact the planner assigned to review the individual small cell facility, or me at 206.275.7732 or evan.maxim@mercergov.org.

Regards,



Evan Maxim, Planning Manager
City of Mercer Island Development Services Group



DEVELOPMENT SERVICES GROUP

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April 4, 2017

WA-CLEC LLC
c/o Crown Castle
Attn: Chelsea Watson
1505 Westlake Avenue North
Seattle, WA 98109

RE: **Small Cell ROW Use Permit Application(s)**
Second Request for Additional Information – MIS01 through MIS24 and MIN01 through MIN15

Dear WA-CLEC LLC:

The City of Mercer Island has received an application for a Right-of-Way (ROW) use permit application that is subject to the Crown Castle Franchise Agreement, signed December 22, 2016. After the initial City review letter of January 12, 2017, additional information and revised applications were received between February 16 and February 22, 2017.

Following review of the revised ROW permit information received in February of 2017, the City has determined that additional revisions and / or information is required prior to issuance of a decision. **Please note:** the City cannot complete its review of the above small cell sites until the following items are addressed.

General:

1. Please provide a response to the following items in a digital format (e.g. PDF). To aid in disseminating revised permit information, please reference both the site number and the ROW permit number. A table of permit numbers and site numbers is included below my signature to aid in resubmittal.

Location: In the January 12, 2017 review letter, the City required the applicant to evaluate relocation of small cell facilities consistent with the franchise agreement terms 6.3.2 and 6.3.3. The city identified the following small cell sites that should be evaluated: MIN01, MIN05, MIN08, MIN12, MIN13, MIS02, MIS17, MIS18, MIS12, MIS21, and MIN04. The evaluation of alternative locations appears to be deficient primarily in that the response relies upon unsupported assertions that alternative locations will increase view impacts, require tree removal or pruning, or will reduce coverage. Please provide the following for the above listed sites:

2. Views. Please provide a site specific analysis and documentation of expected view impacts resulting from the alternative site locations discussed in the February 2017 resubmittal. Site specific analysis should include identification of adjacent single family dwellings affected by the alternative location, a photo-realistic rendering of the proposed alternative location, and analysis of other relevant information (e.g. the presence of trees behind the pole that may reduce the visual appearance of proposed small cell facilities).
3. Trees. Please provide a site specific analysis to support the assertion that alternative site locations discussed in the February 2017 resubmittal will result in additional tree removal / cutting or pruning. Site specific analysis should include identification of trees that would be impacted, a description of the degree

of impact to the tree (e.g. removal of a branch, removal of a significant portion of canopy, or removal of the tree entirely), and the basis for the identified tree impact (e.g. to provide 3 feet of clearance around the antenna, etc).

4. Coverage. Coverage maps, similar to the one provided for MIN04, are appropriate for evaluation of alternative locations, provided a key describing coverage goals / needs is included with the map. The "car mapping" is unclear and does not appear to provide sufficient information to determine whether a possible relocation will affect coverage. Please provide a site specific analysis and documentation of expected coverage impacts resulting from the alternative site locations discussed in the February 2017 resubmittal. Site specific analysis should include coverage maps that provide for comparison between the proposed location and the alternative locations, along with a summary of coverage goals.
5. MIS 12. The response to MIS 12 asserts that alternative location #4 is located on private property. Maps available to city staff indicated alternative location #4 is located in the public right of way. Please provide a basis for the assertion that this pole is located on private property.
6. MIS 16. As noted in the previous review letter of January 12, 2017, this pole appears to be located on private property. Consequently the proposed small cell location cannot be authorized under the franchise agreement or through a right-of-way use permit application. Relocation of the small cell site to a location on West Mercer Way is recommended, in a location where impacts to views will be minimized. Please relocate the proposed small cell facility to West Mercer Way or other alternative location that can be authorized through the franchise agreement.
7. MIN05. No alternative location analysis was provided for this site in response to the January 12, 2017 review letter. Please provide an alternative location analysis, including supporting documentation as described above.

Pole Design:

8. The equipment cabinets for the proposed small cell facilities must be located within the communication space (Franchise Agreement 6.4.4). It appears that none of the proposed equipment cabinets are located in the communications space. Please revise the design to locate equipment cabinets in the communication space.
9. MIN 06. No height calculations were provided, however it appears that the proposed pole replacement exceeds the replacement pole height limits (Franchise Agreement 6.4.5). Please provide height calculations that comply with the replacement pole height limits of 6.4.5.
10. MIS 19. The proposed antenna is not located in the communication space (Franchise Agreement 6.4.3.1). Please revise the proposed antenna location to be located within the communication space.

Antenna location: The Franchise Agreement (Ordinance 16-12) establishes a clear design requirement and priority to locate small cell antennas within the communication space (6.4.3.1). 10 of the original 39 applications reflected the antenna on the side of the pole, but were unclear as to whether the antenna was within the communication space. Following the resubmittal in February of 2017, only 1 (MIS19) of the 39 applications reflected the antenna location mounted on the side of the pole, but not within the communication space.

Based upon the current application materials, it appears that none of the antennas will comply with the design requirements and priorities. Unfortunately, the basis for the apparent design switch to pole top is largely unaddressed by the current application submittals, with the exception of a letter from PSE dated January 30, 2017, wherein PSE notes:

"...Installation in the Communications Space is also currently not permitted. However we are reviewing that restriction and developing criteria in order to allow it. At this point in time PSE is tentatively planning on approving those Crowncastle Mercer Island nodes showing installation in the Communications Space. Please note that in general the Communications Space on our poles is often fully occupied by existing wireline communications attachments and any

new attachment – wireline or wireless – can require replacement of the pole with a 5’ taller pole in order to raise our facilities to create additional attachment space....”

11. MIS20, MIN05, MIN13, MIN09, MIN10, MIS04, MIS06, MIS13, MIS14. These small cell sites previously reflected antennas mounted onto the side of the pole and now reflect a pole top antenna mounting. The PSE letter, excerpt above, indicated that these antennas may be approved mounted on the side of the pole. Please provide documentation that PSE has since determined that the antennas may not be approved if located in the communication space. Please also evaluate each individual pole, including options for increasing pole height to comply with PSE policies and the franchise agreement provisions; documentation of this evaluation is required for the next submittal.
12. MIN01, MIN07, MIN02, MIS09, MIS10, MIS05, MIN11, MIS01, MIS24, MIN04, MIN12, MIN14, MIN15, MIS03, MIS07, MIS08, MIS11, MIS15, MIS22, MIN03, MIS23, MIS18, MIS17, MIS12, MIN08, MIS02, MIS21, MIS16, MIN06. These small cell sites previously reflected antennas mounted on the pole top. The PSE letter, excerpt above, indicates that locating antennas in the communication space may be feasible through an increase in the pole height by 5 feet. Please evaluate each individual pole, including options for increasing pole height to comply with PSE policies and the franchise agreement provisions; documentation of this evaluation is required for the next submittal.

Please coordinate the re-submittal of the above ROW use permit information with Andrea Larson at 206.275.7791 or at andrea.larson@mercergov.org.

Based upon a review of the above, it appears that an additional meeting with Crown Castle may be useful prior to accepting a resubmittal. If a meeting is desired with the city or with the City Attorney’s office, please contact me at your convenience. If you have any questions regarding this letter, please contact me at 206.275.7732 or evan.maxim@mercergov.org.

Regards,



Evan Maxim
Planning Manager
City of Mercer Island Development Services Group
Evan.maxim@mercergov.org
206.275.7732

cc: Richard J. Busch, Busch Law Firm PLLC, VIA EMAIL ONLY
Bio Park, Assistant City Attorney
Kari Sand, City Attorney

ROW Permit #	Site Name	Planner
1701-166	MIN07	Robin Proebsting
1701-136	MIN11	Robin Proebsting
1701-142	MIS01	Robin Proebsting
1701-153	MIS12	Nicole Gaudette
1701-161	MIS20	Nicole Gaudette
1701-165	MIS24	Nicole Gaudette
1701-126	MIN01	Robin Proebsting
1701-127	MIN02	Robin Proebsting
1701-128	MIN03	Robin Proebsting
1701-129	MIN04	Robin Proebsting
1701-130	MIN05	Robin Proebsting
1701-131	MIN06	Robin Proebsting
1701-132	MIN08	Lauren Anderson
1701-134	MIN09	Lauren Anderson
1701-135	MIN10	Lauren Anderson
1701-138	MIN12	Lauren Anderson
1701-139	MIN13	Robin Proebsting
1701-140	MIN14	Lauren Anderson
1701-141	MIN15	Lauren Anderson
1701-143	MIS02	Lauren Anderson
1701-144	MIS03	Nicole Gaudette
1701-145	MIS04	Evan Maxim
1701-146	MIS05	Evan Maxim
1701-147	MIS06	Lauren Anderson
1701-148	MIS07	Lauren Anderson
1701-149	MIS08	Lauren Anderson
1701-150	MIS09	Evan Maxim
1701-151	MIS10	Nicole Gaudette
1701-152	MIS11	Nicole Gaudette
1701-154	MIS13	Nicole Gaudette
1701-155	MIS14	Nicole Gaudette
1701-156	MIS15	Nicole Gaudette
1701-157	MIS16	Evan Maxim
1701-158	MIS17	Evan Maxim
1701-159	MIS18	Evan Maxim
1701-160	MIS19	Evan Maxim
1701-162	MIS21	Nicole Gaudette
1701-163	MIS22	Evan Maxim
1701-164	MIS23	Evan Maxim

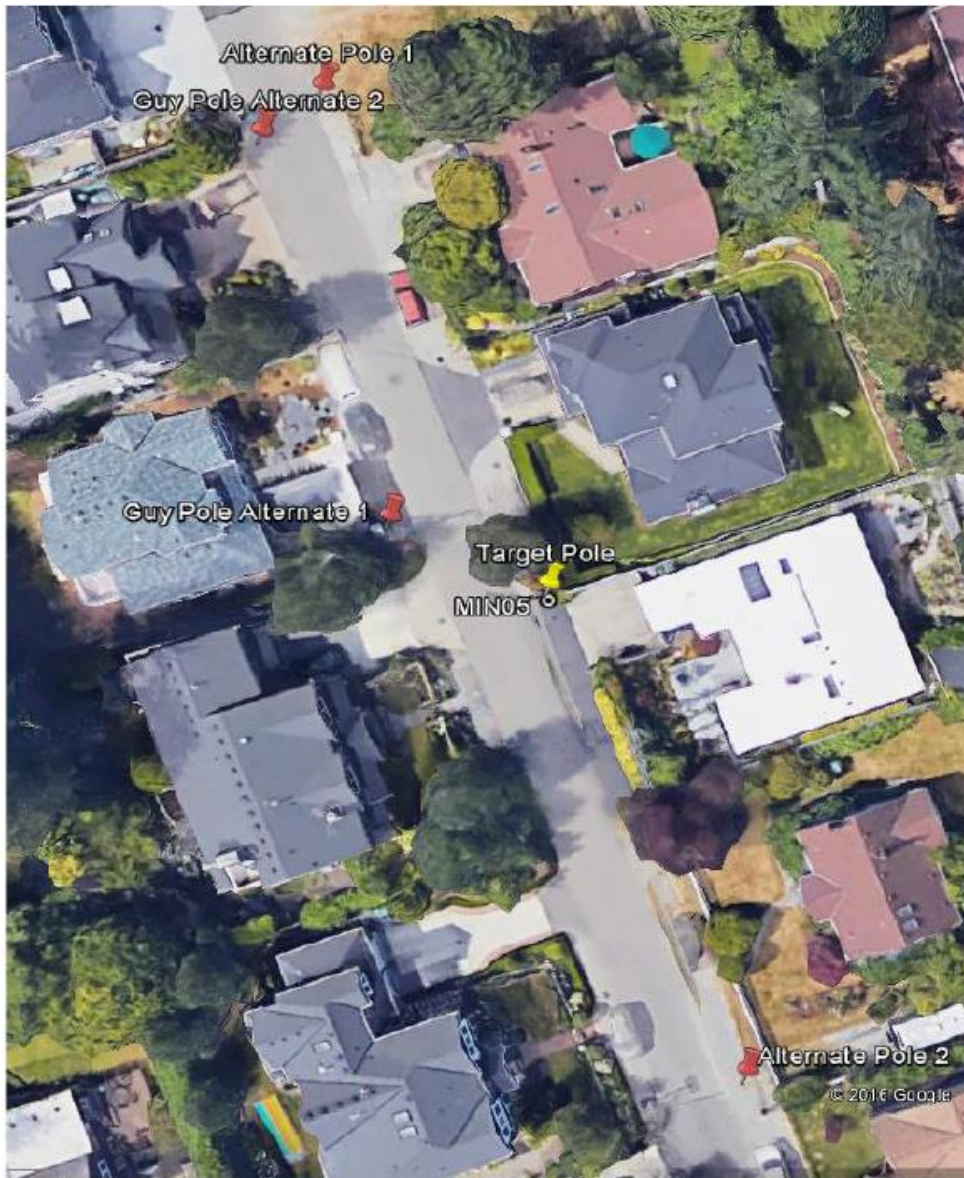
Alternative Site Analysis MIN05

Guy Alternate Pole 1 is located in someone's walkway on private property. (See attached photo and parcel information found on the King County Assessor's Office Parcel Viewer.

Guy Alternate Pole 2 is 150' away from the target pole.

Alternate Pole 1 is 150' away from the target pole.

Alternate Pole 2 is 150' away from the target pole.



Alternative Site Analysis MIS17

City Staff's alternate pole selection will require significant tree pruning and removal of several branches.

Alternate Pole 1 will not decrease the impact to views as it will affect the same amount of houses.



MIS17



Alternate Site Analysis MIS12

Alternate Pole 1, 2, and 3 are all 120' or greater from the target pole.

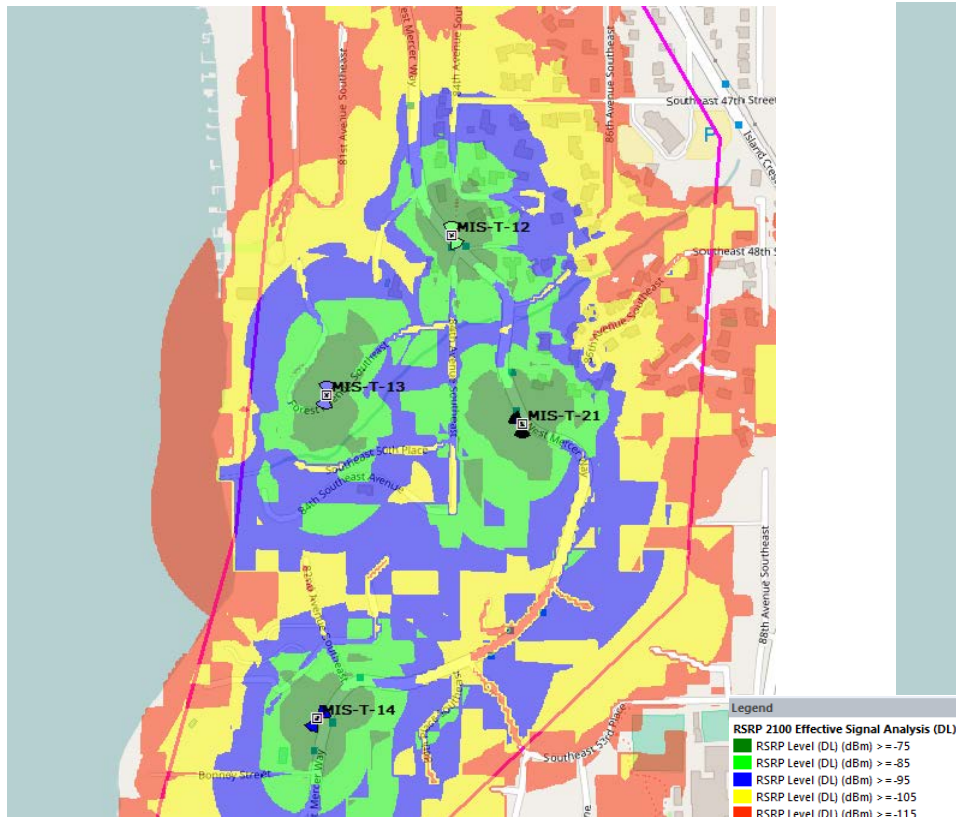
Alternate Pole 3 will required 6-8 feet of pruning and at least two tree branch removals. (See tree photos).

Alternate Pole 4 will not propagate as to fill the significant gap in coverage. See propagation map.

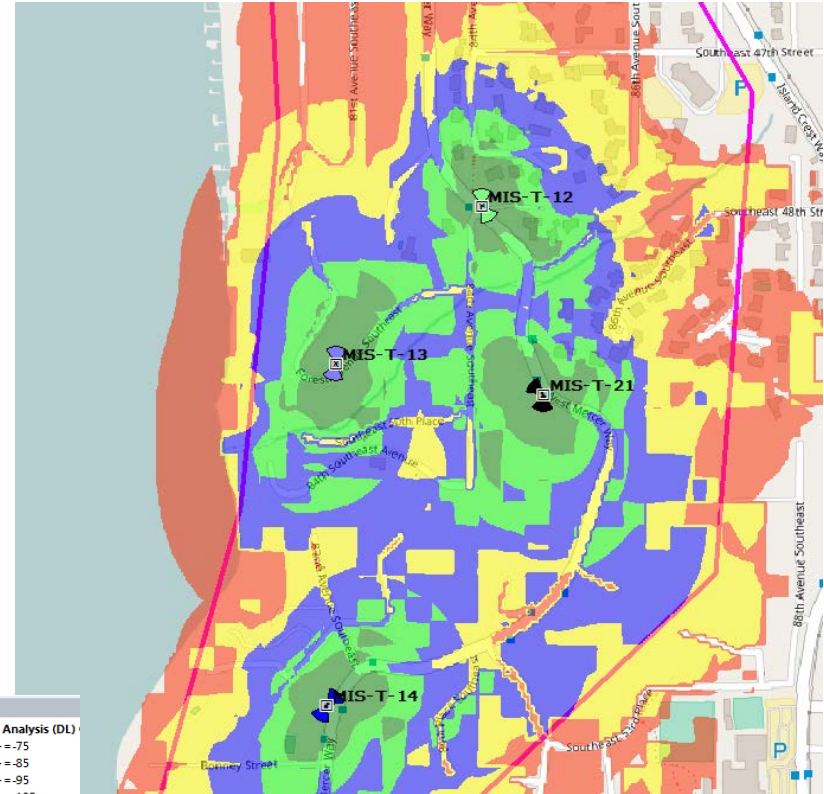


MIS12

As shown in the attached signal propagation map, when site MIS12 is moved to alternative pole #4, there is a significant gap in coverage toward the southwest and northwest where the signal strength is worse than -85 dBm. When site MIS12 is located on its originally proposed pole, it provides service in the significant gap in coverage.



MIS12 in original location



MIS12 relocated onto alternative pole #4