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PROJECT NARRATIVE - ROW at 8215 SE 78th Street (MIV 43)

PROJECT DESCRIPTION

Crown Castle proposes to establish a new small cell facility in the public right-of-way adjacent to 8215 SE 78th Street (zoning designation P). The proposed location for the small cell equipment is attached to a new 46'-0" wood pole to be placed in a landscape island near the intersection of 81st Pl SE & SE 78th St, as shown on sheet A1 of the plan set. The original proposal (approved under 1906-107) was to collocate the small cell equipment on a replacement wood utility pole immediately to the west (SE intersection of SE 78th Street & 81st Pl SE). However, as it was determined that the pole to be replaced is not in the public right-of-way, an alternative location for a new pole supporting small cell equipment is being proposed.

The proposed small cell equipment includes the following:

- (1) omni antenna. The proposed antenna is 28.7" in height and 12" in diameter and will be mounted at the top of the proposed pole. The antenna and mount will be painted to match the wood pole and will have a tip height of 49'-0" AGL.
- (1) Remote Radio Unit (RRU) located within a 36" (h) x 23" (w) x 22" (d) shroud attached to the pole at 15' AGL and painted to match
- (1) disconnect, located below the proposed RRU shroud, painted to match.
- Associated cabling located within conduit. All exterior conduit will be painted to match the wood utility pole.

The proposed small installation will comply with the applicable City of Mercer Island Code sections as follows:

19.06.070 Small cell facilities deployment

The following provisions establish standards for small cell facilities deployments; provided, however, that any small cell or small cell network component which is not exempt from SEPA review shall also comply with Chapter 19.07 MICC:

A. Small Cell Facility Approval Required. Small cell facilities are permitted in all zoning designations subject to a Type II land use review process pursuant to Chapter 19.15 MICC. In addition to the small cell approval, one or more right-of-way use permits may also be required for small cell deployment.

Applicant Response: The subject application is for approval of a Type II land use application for the installation of a new small cell facility, not previously approved under a franchise agreement. In addition, application will be made for a right-of-way use permit.

B. Previously Approved Small Cells on Existing or Replacement Utility Poles. Eligible small cell facilities permitted under the provisions of a franchise approval prior to the adoption of these standards shall be considered to have satisfied the design and concealment standards when installed and maintained in accordance with the franchise agreement.

Applicant Response: Not applicable. The subject facility has not been previously approved under the provisions of a franchise agreement.

C. Replacement Utility Pole – Street Lighting. With the express permission of the city, a replacement utility pole or a new utility pole may be permitted in the form of a new street light standard. The design of the street light standard shall be in accordance with the city lighting requirements in effect at the time of application. Wherever technologically feasible, all equipment and cabling shall be internal to the replacement street lighting standard or concealed through the design and implementation of a concealment plan.

Applicant Response: Not applicable. The proposed pole does not include any street lighting elements.

D. Undergrounded Utility Areas. A service provider or infrastructure company desiring to locate any aboveground infrastructure in an undergrounded utility area shall provide a separate, standalone pole. Pole design to be approved by the city pursuant to MICC 19.06.075.

Applicant Response: Not applicable. All proposed small cell equipment will be attached to the proposed pole.

19.06.075 Small cell deployments – Design and concealment standards

Small cell deployments, whether permitted on the right-of-way pursuant to a franchise or in accordance with this chapter, shall conform to the design standards set forth in this section.

A. Small Cell Deployment Design Standards – General Requirements. All small cell deployments shall comply with the following provisions:

1. Ground-mounted equipment in the rights-of-way is prohibited unless such facilities are placed underground or the applicant can demonstrate that pole-mounted or undergrounded equipment is technically infeasible. If ground-mounted equipment is necessary, then the applicant shall submit a concealment plan pursuant to subsection G of this section. Generators located in the rights-of-way are prohibited.

Applicant Response: Not applicable. No ground mounted equipment is proposed.

2. No equipment shall be operated so as to produce noise in violation of Chapter 8.24 MICC.

Applicant Response: No noise emitting equipment is included as part of this proposal. As such, the facility shall operate in accordance with the noise limitations established by Chapter 8.24 MICC.

3. Small cell facilities are not permitted on traffic signal poles.

Applicant Response: The proposed pole not include a traffic signal.

4. Replacement poles and new poles shall comply with the Americans with Disabilities Act (ADA), city construction and sidewalk clearance standards, and state and federal regulations in order to provide a clear and safe passage within the rights-of-way.

Applicant Response: The proposed pole will be placed in an existing landscape island located within the SE 78th Street right-of-way. The proposed right-of-way location does not include an existing sidewalk area. As such, the replacement pole shall create any non-compliance with the Americans with Disabilities Act (ADA), city construction and sidewalk clearance standards, and state and federal regulations in order to provide a clear and safe passage within the rights-of-way.

5. Replacement poles shall be located as near as possible subject to approval by the city engineer to the existing pole with the requirement to remove the abandoned pole.

Applicant Response: Not applicable. The proposal includes the installation of a new wood pole to support small cell equipment.

6. No signage, message or identification other than the manufacturer's identification or identification required by governing law is allowed to be portrayed on any antenna, and any such signage on equipment enclosures shall be of the minimum amount possible to achieve the intended purpose; provided, that signs are permitted as concealment element techniques where appropriate.

Applicant Response: No signage, message, or identification other than the manufacturer's identification or identification required by governing law shall be portrayed on any antenna. Required site signage shall be placed on the pole below the proposed disconnect, as shown on sheet A2 of the plan set. A detail for the proposed signage as included as detail 5, Sheet D1.

7. Antennas and related equipment shall not be illuminated except for security reasons, required by a federal or state authority, or unless approved as part of a concealment plan.

Applicant Response: No illumination is proposed.

8. Side arm mounts for antennas or equipment are prohibited.

Applicant Response: No side mounts are proposed.

9. The preferred location of a small cell facility on a pole is the location with the least visible impact.

Applicant Response: The pole originally approved for collocation of small cell equipment (1906-107) was subsequently determined to be on private property. As such, the project design was revised to include a new pole within the 78th Street ROW.

Aside from the PSE pole determined to be on private property, no other above ground utility poles exist in the project vicinity. The South side of the 78th Street ROW is characterized by a school parking area including several landscape islands. The North side of the 78th Street ROW is characterized by school recreation area and a mapped critical area. As to avoid potential impacts to the ROW and mapped critical area, the landscape island to the South was determined to be a preferable location for a new utility pole supporting small cell equipment.

The proposed pole has been designed and located to integrate with existing above ground utilities in the vicinity. All equipment will be painted to match the wood utility pole, with additional mitigation of any

visual impacts provided by surrounding landscape. As such, the facility as proposed shall have a minimal visual impact and complies with this section.

Photo simulations, along with a photograph of the pole originally selected for collocation, are being provided as part of this application package. As discussed in the July 14, 2020 pre-application meeting, a site plan to demonstrate required clearances from the pothole location of the nearby City water main and arborist report are also being provided as part of this application package.

10. Antennas, equipment enclosures, and ancillary equipment, conduit and cable shall be located within the building or pole to the maximum extent feasible.

Applicant Response: The proposed small cell antenna will be attached at the top of the pole, as to appear as a continuation of the wood pole. All other small cell equipment shall be flush mounted and painted to match the proposed wood pole.

11. Antennas, equipment enclosures and ancillary equipment, conduit and cable shall not adversely affect the aesthetic appearance or visual character of the building or pole upon which they are attached.

Applicant Response: The proposed small cell antenna will be mounted at the top of the proposed in a manner as to appear as a continuation of the pole. All other equipment will be flush mounted to the pole and painted to match as to minimize visual impacts. The proposed placement and size of the proposed equipment shall not adversely impact the aesthetic appearance or visual character of the pole. Photo simulations are being provided as part of this application to demonstrate compliance with this requirement.

12. The city may consider the cumulative visual effects of small cells mounted on poles, together with existing utility equipment, within the rights-of-way when assessing proposed siting locations so as to not adversely affect the visual character of the city. This provision shall not be applied to limit the number of permits issued when no alternative sites are reasonably available nor to impose a technological requirement on the service provider.

Applicant response: Provision noted.

13. The design criteria as applicable to small cell facilities described herein shall be considered concealment elements and such small cell facilities may only be expanded upon an eligible facilities request described in this chapter, when the modification does not defeat the concealment elements of the facility.

Applicant response: Provision noted.

C. Wooden Pole Design Standards. Small cell facilities located on wooden poles shall conform to the following design criteria in addition to the general requirements set forth in subsection A of this section:

1. The wooden pole at the proposed location may be replaced with a taller pole for the purpose of accommodating a small cell facility; provided, that the replacement pole shall not exceed a height that is a maximum of 10 feet taller than the existing pole, unless a further height increase is required and

confirmed in writing by the pole owner and such height extension is the minimum extension possible to provide sufficient separation and/or clearance from electrical and wireline facilities.

Applicant Response: A previous approval (1906-107) included the replacement of a 36'-7" wood utility pole with a 45'-7" wood utility pole to support small cell equipment. However, it was later determined by the City that the subject pole is not located in the right-of-way. As an alternative, Crown Castle proposes to install a new wood pole of comparable size (46'-0" AGL) in the landscape island to the east. As the proposed pole will not exceed the height of the adjacent pole by more than 10', the proposal can be found to meet this criterion.

2. A pole extender may be used instead of replacing an existing pole but may not increase the height of the existing pole by more than 10 feet unless a further height increase is required and confirmed in writing by the pole owner and such height increase is the minimum extension possible to provide sufficient separation and/or clearance from electrical and wireline facilities. The pole extender shall be painted to approximately match the color of the pole and shall substantially match the diameter of the pole measured at the top of the pole.

Applicant Response: Not Applicable. The proposed omni antenna will be attached directly to the top of the proposed 46'-0" wood utility pole. No pole extender will be used.

3. Replacement wooden poles may either match the approximate color and materials of the replaced pole or shall be the standard new wooden pole used by the pole owner in the city.

Applicant Response: The proposed pole shall match the color and materials of the existing poles in the vicinity. Please refer to the provided photo simulations for renderings of proposed color and material.

4. Antennas, equipment enclosures, and all ancillary equipment, boxes and conduit shall be colored, powder coated, or other permanent coloration, to match the approximate color of the surface of the wooden pole on which they are attached.

Applicant response: All small cell equipment shall be painted to match the proposed pole. Please refer to the provided photo simulations for renderings.

5. Panel antennas shall not be mounted on the side of a pole more than 12 inches from the surface of the wooden pole, measured from the exterior surface of the pole to the furthest extent of the panel antenna.

Applicant Response: Not applicable. The proposed omni antenna will be attached to the top of the wood utility pole.

6. Antennas should be placed in an effort to minimize visual clutter and obtrusiveness. Multiple antennas are permitted on a wooden pole; provided, that each antenna enclosure shall not be more than three cubic feet in volume, with a cumulative total antenna volume not to exceed 12 cubic feet.

Applicant Response: The proposed omni antenna is 12" in diameter and 28.7" inches height, or approximately 1.88 cubic feet. The omni antenna will be attached directly to the top of the proposed pole as to appear as a continuation of the wood utility pole, minimizing any visual clutter or obtrusiveness.

7. In addition to the increased antenna height allowed in subsection (C)(2) of this section, a canister antenna may be mounted on top of an existing wooden pole, which may not exceed the height requirements described in subsection (C)(1) of this section. A canister antenna mounted on the top of a wooden pole shall not exceed 16 inches, measured at the top of the pole, and shall be colored or painted to match the pole. The canister antenna must be placed to look as if it is an extension of the pole. In the alternative, the applicant may propose a side-mounted canister antenna, so long as the inside edge of the antenna is no more than 12 inches from the surface of the wooden pole. All cables shall be concealed either within the canister antenna or within a sleeve between the antenna and the wooden pole.

Applicant Response: The proposed omni antenna is 12" diameter and will be attached directly to the top of the proposed utility pole. The proposed antenna will be painted to match and appear as a continuation of the wood pole. All cabling will be placed in conduits on the exterior of the pole, flush mounted and painted to match. Please refer to sheets A3 and A3.1 of the development plan set for visual renderings of the proposed small cell equipment.

8. In addition to the increased antenna height allowed in subsection (C)(2) of this section, an omnidirectional antenna may be mounted on the top of an existing wooden pole, provided such antenna is no more than four feet in height and is mounted directly on the top of a pole or attached to a sleeve made to look like the exterior of the pole as close to the top of the pole as technically feasible. All cables shall be concealed within the sleeve between the bottom of the antenna and the mounting bracket.

Applicant Response: The proposed omni antenna is 12" in diameter and will be attached directly to the top of the proposed 46'-0" utility pole. The overall height of the facility, inclusive of the small cell antenna will be 49'-0" AGL. The proposed antenna will be painted to match and appear as a continuation of the wood pole. Please refer to sheets A3 and A3.1 of the development plan set for visual renderings of the proposed small cell equipment.

9. All related equipment including but not limited to ancillary equipment, radios, cables, associated shrouding, microwaves, and conduit which are mounted on wooden poles shall not be mounted more than six inches from the surface of the pole, unless a further distance is technically required, and is confirmed in writing by the pole owner.

Applicant Response: All associated equipment shall be flush mounted to the proposed wood pole. Please refer to sheets D1.1 and D1.2 of the plan set for attachment details.

10. Equipment for small cell facilities must be attached to the wooden pole, unless otherwise permitted to be ground-mounted pursuant to subsection A of this section. The equipment must be placed in the smallest enclosure possible for the intended purpose. The equipment enclosure may not exceed 17 cubic feet. Multiple equipment enclosures may be acceptable if designed to more closely integrate with the pole design and do not cumulatively exceed 17 cubic feet. The applicant is encouraged to place the equipment enclosure behind any banners or road signs that may be on the pole if such banners or road signs are allowed by the pole owner.

Applicant response: All proposed small cell equipment is attached to the proposed wood pole. No ground mounted equipment is proposed.

11. The visual effect of the small cell facility on all other aspects of the appearance of the wooden pole shall be minimized to the greatest extent reasonably possible.

Applicant Response: The proposed small cell equipment will be flush mounted and painted to match the proposed pole. The proposed placement and size of the proposed equipment shall not adversely impact the aesthetic appearance or visual character of the pole. Further, all equipment will be painted to match the wood utility pole, with additional mitigation of any visual impacts provided by surrounding vegetation.

Photo simulations are being provided as part of this application. Please refer to sheets A3 and A3.1 of the plan set.

12. The use of the wooden pole for the siting of a small cell facility shall be considered secondary to the primary function of the pole. If the primary function of a pole serving as the host site for a small cell facility becomes unnecessary, the pole shall not be retained for the sole purpose of accommodating the small cell facility and the small cell facility and all associated equipment shall be removed.

Applicant Response: It was determined that the previously approved location for this facility is not located within the right-of-way. As such, Crown Castle is proposing to install a new pole in the adjacent right-of-way area for the provision of wireless service. Crown Castle will maintain ownership of the proposed pole.

13. All cables and wires shall be routed through conduit along the outside of the pole. The outside conduit shall be colored, powder coated, or other permanent coloration, to match the pole. The number and size of conduits shall be minimized to the number technically necessary to accommodate the small cell.

Applicant Response: All cables and wires shall be routed through a conduit, painted to match, attached to the outside of the wood pole. In addition, flex conduit will be used to provide screening for the cable path from the main conduit to the omni antenna.

F. New Poles in the Rights-of-Way for Small Cell Facilities.

1. New poles within the rights-of-way are only permitted if the applicant can establish that:

a. The proposed small cell facility cannot be located on an existing utility pole or light pole, electrical transmission tower or on a site outside of the public rights-of-way such as a public park, public property, building, transmission tower or in or on a nonresidential use in a residential zone whether by roof or panel-mount or separate structure;

Applicant Response: The original proposal (approved under 1906-107) was to collocate the small cell equipment on a replacement wood utility pole immediately to the west (SE intersection of SE 78th Street & 81st PL SE). However, it was determined that the pole to be replaced is not in the public right-of-way. Further, no other above ground utility poles exist in the right-of-way at the proposed location. As such, Crown Castle is proposing to install a new pole of comparable size in a landscape island located within the SE 78th Street ROW. Crown Castle will maintain ownership of the proposed pole.

b. The proposed wireless communications facility receives approval for a concealment plan, as described in subsection G of this section;

Applicant Response: concealment plan is described below as part of response to subsection G.

c. The proposed wireless communications facility also complies with the Shoreline Master Program and SEPA, if applicable; and

Applicant Response: A SEPA checklist is being provided as part of this application.

d. No new poles shall be located in a critical area or associated buffer required by the city's critical areas ordinance, except when determined to be exempt pursuant to said ordinance.

Applicant Response: The proposed location is not within a critical area or associated buffer.

G. The concealment plan shall include the design of the screening, fencing or other concealment technology for a pole or equipment structure, and all related transmission equipment or facilities associated with the proposed wireless communications facility, including but not limited to fiber and power connections.

1. The concealment plan shall seek to minimize the visual obtrusiveness of wireless communications facility installations. The proposed pole or structure shall have similar designs to existing neighboring poles in the rights-of-way, including to the extent technically feasible similar height. Other concealment methods include, but are not limited to, integrating the installation with architectural features or building design components, utilization of coverings or concealment devices of similar material, color and texture – or the appearance thereof – as the surface against which the installation will be seen or on which it will be installed, landscape design, or other camouflage strategies appropriate for the type of installation. Applicants are required to utilize designs in which all conduit and wirelines are installed internally in the structure or otherwise integrated into the design of the structure. Use of a unified enclosure equal to or less than four cubic feet in volume may be permitted in meeting these criteria. This requirement shall be applied in a manner which does not dictate the technology employed by the service provider nor unreasonably impair the technological performance of the equipment chosen by the service provider.

Applicant Response: The proposed location for the small cell equipment is attached to a wood pole, designed and located to integrate with surrounding above ground infrastructure as to have a minimal visual impact.

The concealment plan includes mounting a single omni antenna at the top of the proposed pole and painting all equipment to match the pole. All cabling will be routed on the interior proposed conduit, and the proposed pole is of comparable height to above ground utilities in the vicinity.

Photo simulations along with a photo of the adjacent wood utility pole are being provided as part of this application package. As the existing wood pole was determined to be on private property, the project design includes a new pole designed to integrate with existing aboveground infrastructure in the vicinity.

2. If the code official has already approved a concealment plan either for the applicant or another wireless communications facility along the same public right-of-way or for the same pole type, then the

applicant shall utilize a substantially similar concealment plan, unless it can show that such concealment plan is not physically or technologically feasible, or that such deployment would undermine the generally applicable design standards.

Applicant response: the proposed concealment plan is consistent with previously approved small cell installations in the Mercer Island public right-of-way.

H. These design standards are intended to be used solely for the purpose of concealment and siting. Nothing herein shall be interpreted or applied in a manner which dictates the use of a particular technology. When strict application of these requirements would unreasonably impair the function of the technology chosen by the applicant, alternative forms of concealment or deployment may be permitted which provide similar or greater protections from negative visual impacts to the streetscape. (Ord. 19C-02 § 3 (Exh. A)).

Applicant Response: Provision noted.