



November 14, 2022

City of Redmond
Development Services Center
15670 NE 85th St
Redmond, WA 98052

RE: Project Narrative – SE02377A S Marymoor-PSE (16852 NE 40th St Redmond, WA 98052)

To Whom it May Concern:

T-Mobile is currently upgrading and integrating former Sprint sites into its network because of the recent merger and acquisition of Sprint. The Redmond area is one area where T-Mobile will make available improved telephone service and provide wireless coverage and capacity to its subscribers.

It is T-Mobile's desire to work with the City of Redmond to ensure that this project is consistent with local ordinances and zoning regulations while providing wireless coverage to T-Mobile's customers and provide critical communication services for emergency, business, and personal use.

The applicant is requesting the following:

- Wireless Communication Facility II Permit approval
- Miscellaneous Building Permit (Commercial-Wireless Comm. Facility) approval
- Right-of-Way Permit approval

Project Overview

The applicant, T-Mobile, proposes an alteration to an existing utility pole wireless communication site located in the public right-of-way and ground equipment relocation to private property located at 16852 NE 40th St Redmond, WA 98052 (Parcel No. 5556300046).

The current site is a former Sprint site which was originally built to their specifications and market needs at that time. T-Mobile's site standards and equipment have improved over time (as has every carrier's) and requires additional room for operation. The current Sprint ground equipment space within the right-of-way is too small to support the transition to a T-Mobile cell site. Therefore, T-Mobile is proposing to relocate the supporting ground equipment to adjacent private property.

The proposed alteration consists of the following: On the utility pole remove (3) existing Sprint antennas, (3) RRU's, and supporting mounting equipment. Install (6) T-Mobile antennas, (6) RRH's, (2) pendants, (2) hybrid cables, and (2) mounts on existing utility pole. Remove existing Sprint ground equipment within the right-of-way and relocate to private property. Install a 10' x 12' equipment shelter (shed) with perimeter landscaping. Within shelter: (2) equipment cabinets, telco and 200A PPC panels, and (2) Junction boxes. Please see site plan and construction drawings for more detailed information.

Zoning Code Analysis

Per Redmond Zoning Code (RMC Title 21), a type II wireless permit is required for the scope of work related to the ground equipment relocation from right-of-way to private property. Additionally, per a February 24, 2022, email from Andrea Kares, it was determined that *“the process to install a ground mounted equipment enclosure on a residential property would be a type II wireless permit. As what you are proposing is on a different parcel than what was originally approved for the utility pole in the ROW the City would define it as a new facility.”*

Table 21.76.070 Wireless Communication Review Process:

| Table 21.76.070 Wireless Communication Facilities Review Process | | | |
|--|-----------------------|---|--|
| Wireless Communication Facility Type (WCF) | Zone | Structure | Land Use Permit Type |
| Macro Cell Facility and Small Cell Facility attached to Utility Poles, Light Poles and Miscellaneous Poles | All residential zones | Existing and Replacement Utility Poles, Light Poles | Type II None required for Small Cell Facilities located within public |

Accordingly, this proposal is for an alteration to an existing macro cell facility located on a utility pole with associated ground equipment relocated from the right-of-way and proposed on adjacent residential private property.

21.56.040 General Development Standards

- 4. New Antenna Support Structures for Small Cell Facilities and Macro Cell Facilities and associated Equipment Enclosures:
 - a. New antenna support structures shall be ground mounted only and shall not be located in any setback areas on private and public property.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

- b. In all zones except for UR and R zones, the combined height inclusive of antennas shall not exceed 85 feet, except when collocation is specifically provided for, then the new antenna support structure shall not exceed 100 feet. New antenna support structures located within public rights-of-way shall be limited to 50 feet in height inclusive of antennas.

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- c. In UR and R zones, the combined height inclusive of antenna(s) shall not extend more than 15 feet above the maximum height of the zone for which it is proposed to a maximum of 60 feet. A height increase of 15 feet may be allowed by the Administrator when collocation is specifically provided. New antenna support structures located within public rights-of-way shall be limited to the maximum height allowed in the underlying zone.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

- d. Ground mounted equipment enclosures outside the public rights-of-way shall not exceed a footprint of 240 square feet (e.g., 12 by 20 feet) for macro cell facilities and 16 square feet (e.g., 4 by 4 feet) small cell facilities unless operators can demonstrate that more space is needed.

The proposed, relocated ground equipment to private property supports a macro cell facility. The proposed shed structure is 10' x 12' which meets the size requirement.

- e. Pole mounted equipment enclosures, unified camouflage designs and associated transmission equipment (excluding antennas but including all conduit), and all other wireless equipment associated with the antennas and any pre-existing associated equipment on the pole shall be of the minimum size possible and shall not exceed 28 cubic feet.

T-Mobile's proposed antennas and equipment on the utility pole will be the minimum size necessary to operate and provide effective service to its subscribers.

- f. Placement of a new antenna support structure shall be denied unless the applicant can demonstrate through an alternative site analysis or other supporting documentation that other existing WCF sites and the siting hierarchy per RZC 21.56.030(C) or (D) were considered and are either not technically feasible or available.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

- g. Special Exceptions per RZC 21.56.060 apply to locate a new Antenna Support Structure in UR, RA-5, R-1, R-2, R-3, R-4, R-5 & R-6 zones or within shoreline areas of the City or to exceed height limits in any zone

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

21.56.050 Design Standards for Wireless Communication Facilities

4. New Antenna Support Structures for Small Cell Facilities and Macro Cell Facilities and associated Equipment Enclosures.

- a. For macro cell facilities stealth technology shall be required using structures such as monopines (that mimic a native tree), slimline poles, flagpoles or other similar poles. The pole type chosen shall blend with existing characteristics of the subject site when located outside public rights-of-way or shall blend with the streetscape and street poles when located within public rights-of-way. Glulam poles may be allowed if compatible and only when blended with existing characteristics such as mature trees and/or other existing wooden poles. The new antenna support structure shall be painted to blend with the background of the surrounding environment. Guyed and Lattice Antenna Support Structures are prohibited.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

- b. For small cell facilities located in the rights-of-way, applicants shall use utility or lightpoles that have a similar or compatible design to existing neighboring utility or light poles in the rights-of-way.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure therefore this doesn't apply.

- c. Antennas shall be internal to the pole or placed in a canister at the top of the pole, if technically feasible otherwise external antenna mounts are allowed and shall be flush mounted. Unified camouflage designs concealing antennas and equipment within a single enclosure meeting dimensional requirements as specified in RZC 21.56.040.A.4.e are permitted. If standoff mounts or brackets are used such mount or bracket shall be located as close to the pole as technically feasible; however, in no case shall the mount or bracket extend more than 12 inches off the pole, measured from the inside edge of the antenna to the surface of the pole.

This is an existing macro cell site with existing antennas external on the utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. This is not a new antenna support structure, but the antennas and equipment will be painted to match the utility pole as per previous conditions.

- d. Full concealment of antennas, equipment enclosures and all associated transmission equipment is required for all poles when located along Leary Way, Cleveland Street, Gilman Street, Bear Creek Parkway and 152nd Avenue NE between NE 20th and NE 31st Streets. Equipment enclosures shall be fully concealed within the base of the pole, inside the pole or incorporated into street furniture, park furniture and/or other similar features and structures whenever technically feasible. Mounting to the exterior surface of the pole is not allowed unless camouflaged to appear as an integrated part of the pole.

This does not apply. The pole is not located along Leary Way, Cleveland Street, Gilman Street, Bear Creek Parkway and 152nd Avenue NE between NE 20th and NE 31st Streets. Additionally, no equipment enclosure will be mounted on the pole.

- e. Pole mounted equipment enclosures and all associated transmission equipment shall be allowed after considering full concealment inside the pole. Pole mounted equipment shall be located in a manner that minimizes clutter and visual impact. Equipment enclosures shall be limited to a maximum of one enclosure per pole, unless the applicant can demonstrate that multiple equipment enclosures will provide less of a visual impact. The primary equipment enclosure may not exceed the size parameter outlined in RZC 21.56.040.A.4.e. If photo simulations show that all equipment located outside an enclosure will provide less of a visual impact then no enclosures shall be required.

This is an existing macro cell site with existing antennas on utility pole. The proposal is to replace and add similar antennas and equipment on the utility pole. The pole can't support the macro base equipment required to support the cell site. Therefore, it will be relocated from the right-of-way (because this area is also too small) to private property.

- f. Equipment enclosures and transmission equipment mounted to the exterior surface of the pole shall be painted to match the pole and existing or required signage (such as but not limited to no parking signs and other similar signage) shall be utilized to conceal equipment whenever possible within public rights-of-way. The antennas and equipment shall not dominate the structure upon which it is attached and shall be visually concealed utilizing color and compatible material to camouflage the facility.

The antennas and associated pole mounted equipment will be painted to match. The proposal is to replace and add similar antennas and equipment on the utility pole.

- g. Collocations shall be prohibited for macro cell facilities located within public rights-of-way, except where fully concealed within a stealth or slimline pole.

There will not be a collocation on this utility pole.

- h. Cable and/or conduit shall be routed through the inside of all poles.

This is an existing pole. This does not apply. However, it will be painted to match the color of the pole.

- i. A Type I visual screen (90 percent solid barrier or more) pursuant to RZC 21.32.080, Types of Planting, shall be required for any ground equipment enclosure located within a new compound/lease area outside public rights-of-way. Landscaping for the purpose of screening shall be maintained in a healthy condition. The use of concrete or concrete aggregate shelters is not allowed in UR, RA-5 and R zones. Any fencing required for security shall meet screening codes in the same manner as applied to screening for mechanical and service areas in RZC 21.60.040.D, Accessory Standards.

The ground equipment will be within an enclosure designed to look like a typical garden shed. Landscaping will consist of existing, mature rhododendron trees and azaleas, some relocated, will sufficiently screen the shed from public view. Additionally, the shed location is located behind an existing privacy fence along the property line with additional landscaping. Please see provided photos and reference Google Street view for view of area.

- j. Within the shoreline jurisdiction, additional screening shall be provided through plantings or double rows of native conifers surrounding the base of the structure. (SMP)

This project is not located within a shoreline jurisdiction.

WAC 197-11-800 SEPA Categorical Exemptions

(25) Wireless service facilities.

(a) The siting of wireless service facilities are exempt if:

(i) The collocation of new equipment, removal of equipment, or replacement of existing equipment on existing or replacement structures that does not substantially change the physical dimensions of such structures; or

(ii) The siting project involves constructing a wireless service tower less than sixty feet in height that is located in a commercial, industrial, manufacturing, forest, or agricultural zone.

(b) For the purposes of this subsection:

(i) "Wireless services" means wireless data and telecommunications services, including commercial mobile services, commercial mobile data services, unlicensed wireless services, and common carrier wireless exchange access services, as defined by federal laws and regulations.

(ii) "Wireless service facilities" means facilities for the provision of wireless services.

(iii) "Collocation" means the mounting or installation of equipment on an existing tower, building, structure for the purposes of either transmitting or receiving, or both, radio frequency signals for communication purposes.

(iv) "Existing structure" means any existing tower, pole, building, or other structure capable of supporting wireless service facilities.

(v) "Substantially change the physical dimensions" means:

(A) The mounting of equipment on a structure that would increase the height of the structure by more than ten percent, or twenty feet, whichever is greater; or

(B) The mounting of equipment that would involve adding an appurtenance to the body of the structure that would protrude from the edge of the structure more than twenty feet, or more than the width of the structure at the level of the appurtenance, whichever is greater.

(c) This exemption does not apply to projects within a critical area designated under GMA (RCW 36.70A.060).

The project is categorically exempt from SEPA review. This proposal does substantially change the physical dimensions of the support structure. Please see the construction drawings more detailed information.

(1) Minor new construction - Flexible thresholds.

(a) The exemptions in this subsection apply to all licenses required to undertake the construction in question. To be exempt under this subsection, the project must be equal to or smaller than the exempt level. For a specific proposal, the exempt level in (b) of this subsection shall control, unless the city/county in which the project is located establishes an exempt level under (c) of this subsection. If the proposal is located in more than one city/county, the lower of the agencies' adopted levels shall control, regardless of which agency is the lead agency. The exemptions in this subsection apply except when the project:

(i) Is undertaken wholly or partly on lands covered by water;

(ii) Requires a license governing discharges to water that is not exempt under RCW 43.21C.0383;

(iii) Requires a license governing emissions to air that is not exempt under RCW 43.21C.0381 or WAC 197-11-800 (7) or (8); or

(iv) Requires a land use decision that is not exempt under WAC 197-11-800(6).

(b) The following types of construction shall be exempt:

(i) The construction or location of four detached single family residential units.

(ii) The construction or location of four multifamily residential units.

(iii) The construction of a barn, loafing shed, farm equipment storage building, produce storage or packing structure, or similar agricultural structure, covering 10,000 square feet, and to be used only by the property owner or his or her agent in the conduct of farming the property. This exemption shall not apply to feed lots.

(iv) The construction of an office, school, commercial, recreational, service or storage building with 4,000 square feet of gross floor area, and with associated parking facilities designed for twenty automobiles. This exemption includes parking lots for twenty or fewer automobiles not associated with a structure.

(v) Any fill or excavation of 100 cubic yards throughout the total lifetime of the fill or excavation and any excavation, fill or grading necessary for an exempt project in (i), (ii), (iii), or (iv) of this subsection shall be exempt.

Additionally, the relocation of the ground equipment to private property is exemption under WAC 197-11-800 (1)b(iv) and WAC 197-11-800 (1)b(v).

Sincerely,

Bryson Burghardt

Land Use Specialist

Smartlink Group

bryson.burghardt@smartlinkgroup.com

360-581-8189