

## Project Narrative

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Applicant: Phoenix Tower International (wireless facility owner) as well as on behalf of Dish Wireless LLC, New Cingular Wireless PCS LLC (AT&T wireless), and T-Mobile West LLC (collocating wireless tenants on facility)

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Submitted To: City of Lake Forest Park  
17425 Ballinger Way NE  
Lake Forest Park, WA 98155

Date: November 14, 2022

Project Name: US-WA-1010 Lake Forest Park

Project Address: 19701 47TH AVE NE (site address)  
4500 NE 195TH ST (parcel main address)

Parcel Number: 4027700066

Application Type: Wireless Communication Facility Application  
Condition Use Permit Application

### Submittal Package

- Project Narrative
  - Submittal package contents
  - Project Description
  - Request to approve WCF with condition BPs to follow
  - Explanation of need of upgrade to existing facility
  - Height justification for replacement facility

- Inventory of WCF sites operated by the applicant in the city or within 1 mile of city limits
  - Documentation of efforts to collocate on existing facilities (not applicable, this is a colocation)
  - WCF application submittal requirements and responses
  - Code analysis
- Wireless Communication Facility Application
- Regulatory review response letter
- Plan set (zoning/planning review set for approval, not final construction drawings, construction drawings to be provided at building permit submittal)
  - Scaled plan indicating location, type, dimensions, height, number, color, and technical specifications of the proposed antennas (plan sheet A-4 and A-5)
  - Scaled elevation plan of existing and proposed structure (plan sheet A-4)
  - A site/landscaping plan showing the specific placement of the WCF on the site (Site location on sheets A-1, A-3, A-3 of plan set, no existing or proposed landscaping)
- Coverage maps and height justification: Both proposed collocating new tenants have supplied RF justification packages/coverage maps. T-Mobile is existing and does not need justification.
  - Dish Wireless RF coverage maps and justification
  - AT&T RF coverage maps and justification
  - Additional 10' of height above antennas are required to allow for a natural taper to the top of the monopole as to make a more natural, tree-like, shape.
- Documentation that facility complies with FAA regulation/FAA Air Safety Analysis
- Non-Interference Letter - Verification that proposed facility will not cause interference with the transmission or reception of other facilities (letter attached as well as an attached professional engineer stamped intermodulation study demonstrating noninterference and signed NIER report)
- View shed map and existing view shed photos
- Photo simulations
- Environmental site assessment report findings (full 234 page report including findings in printed copies provided, additional references, figures, and appendices provided in electronic version only)
- Conditional Use Permit Application
- Responses to Conditional Use Permit Application Criteria
- SEPA checklist

## **Project Description**

In an effort to allow for the collocation and consolidation of wireless facilities as is required by code in the city of Lake Forest Park, the owner of this existing wireless facility is requesting approval to replace an existing 42' tall single carrier pole with a new (4) carrier capable 90' tall monopole to support (2) new collocating wireless carriers, the relocation of the existing wireless carrier, and space for an additional fourth collocating carrier without need for future expansion. Additionally, we are requesting the expansion of the footprint of the current facility by approximately 907 square feet in order to facilitate the ground equipment of the (2) additional proposed co-locators as well as (1) future co-locator.

While the zone of the underlying parcel and the adjacent parcels are RS-9,600 SFR, the use of underlying parcel and the immediately adjacent parcel is for public utility use with no residential use on either parcel.

The proposed expansion of the footprint is wholly within the existing developed land of the existing Seattle Public Utilities reservoir facility/compound and no un-developed / un-disturbed land is proposed to be disturbed by this facility expansion.

There is no existing landscaping required by the existing facility. There is no space between the existing SPUD reservoir 12' tall security fence and the existing wireless facility to add additional landscaping.

As the modified facility will allow the consolidation of multiple carriers onto a single structure, and as this location is the least impactful to any residential use in this geographic location, modifying this facility will be the best available option to allow the RF coverage objectives of multiple carriers while minimizing any impact to existing residential uses as there are no non-residential zones in the area.

## **Request to approve WCF and condition BPs to follow**

As discussed with Nick Holland, we are requesting to not submit building permit applications concurrently with this WCF application. We are proposing to obtain WCF/planning approval of the replacement facility, compound expansion, and the tenant carriers' additional antennas and equipment. We will come back at a future time to obtain a building permit for the project to replace the tower and expand the facility, and the tenant carriers will obtain separate building permits for their individual installations with planning approval having been obtained under this WCF.

Please allow us to defer the building permit submittals for all work to a later time and condition building permits on final planning approval.

### **Explanation of need of upgrade to existing facility**

Two separate carriers (Dish Wireless and AT&T Wireless) have determined that there was a need to upgrade their coverage in this geographic area. As colocation and consolidation of wireless facilities is required by code, both carriers searched for existing facilities on which to collocate. Both carriers determined that this existing wireless facility was the only location of an existing structure that would allow them to achieve their RF coverage objectives, and both carriers applied to the owner of that structure, Phoenix Tower International, to collocate on that structure.

As the existing structure is not feasibly upgradable to accommodate the technological needs of multiple additional co-locators, it was determined that a replacement of the structure was required.

### **Height justification for replacement facility**

In order to accommodate the RF coverage needs to the co-locators current and future technological needs, and the space needed on the structure to accommodate multiple current and future co-locators, the replacement structure will need to be able to accommodate antennas up to a tip height of 80' above grade level. It is recommended that up to an additional 10' above the top of the antennas is allowed for the monopole to allow for a natural taper of the branches to a natural taper that more closely resemble a tree. If this additional space for taper is not allowed, the end result will be a more squared off, un-natural shape at the top.

We are requesting approval to exceed the zone height limit in order to facilitate the colocation/consolidation needed.

### **Inventory of WCF sites operated by the applicant in the city or within 1 mile of city limits**

The applicant, Phoenix Tower International, does not own or operate any other WCF facilities within the city limits of the city of Lake Forest Park, nor with 1 mile of the city limits.

The wireless carriers are co-locating on a modified existing WCF and no new WCFs are proposed.

### **Documentation of efforts to collocate on existing facilities**

This project is the result of the colocation and consolidation of existing and multiple proposed wireless facilities into a single facility. The requirement of colocation has been met.

### **Landscape**

There is no existing landscaping required by the existing facility. There is no landscape addition proposed. There is no space between the existing SPUD reservoir owned 12' tall security fence

and the existing wireless facility to add additional landscaping and contain the area of the water reservoir used by the facility. The ground equipment is partially screened from views by the adjacent heavily foliated area on the adjacent parcel and from the raised area of the water reservoir facility from residential properties to the east and south. See view shed map/photos. As there is no place to add landscaping on the west side at the existing SPUD security fencing, and the eastside of the compound would only screen from an un-manned water reservoir that is already screened from residential properties by topography, we are not proposing landscaping.

### **WCF application submittal requirements and responses (18.68.040)**

- A diagram or map showing the primary viewshed of the proposed facility.
  - *Response: See attached view shed map and existing view shed photos have been provided.*
- A map showing the coverage area of the proposed WCF at the requested height.
  - *Response: See attached RF justification and coverage maps from both new co-locators.*
- A scaled plan indicating the location, type, dimensions, height, number, color and technical specifications of the proposed antenna(s).
  - *Response: Included in sheets A-4 and A-5 of plan set.*
- A scaled elevation plan of the existing or proposed structure showing the proposed antenna(s) and equipment structure.
  - *Response: Included in sheet A-4 of plan set.*
- An explanation of the need for the proposed WCF, including an analysis of alternative sites which supports the selected site over other possible locations, particularly locations in a higher priority zone.
  - *Response: Included in project description section above. As this is a colocation it has met the highest priority siting criteria.*
- An inventory of other WCF sites operated by the applicant that are either in the city or within one mile of its borders, including specific information about location, height, and design of each facility.
  - *Response: Included in project description section above.*
- A site/landscaping plan showing the specific placement of the WCF on the site; showing the location of existing structures, trees and other significant site features and indicating type and locations of plant materials used to screen WCF components.

- *Response: Site plans showing existing and proposed site conditions and features on sheets A-1, A-2, A-3 of plan set. See landscaping section of project description above for landscaping information.*
- Documentation verifying that the proposed WCF complies with any applicable regulations and specifications in accordance with the Federal Aviation Administration (FAA).
  - *Response: See attached FAA Federal Airways & Airspace analysis that shows that the modified facility complies with FAA requirements, does not exceed any notice criteria, and further notice/registration with the FAA is not required.*
- A notarized letter signed by the applicant stating that the antenna usage will not interfere with other adjacent or neighboring transmission or reception signals.
  - *Response: This is a collaborative effort to collocate multiple wireless carriers into an existing facility. In lieu of a notarized letter from a single carrier, we have commissioned a Non-Ionizing Radiation (NIER) Report stamped and signed by a licensed professional engineer for the whole of the facility with all carriers installed. In addition to confirming that the facility will be fully compliant with all FCC rules for RF exposure, it also states that the facilities will not interfere with any other facilities.*
- Photo simulations of the proposed facility from affected properties and public rights-of-way at varying distances.
  - *Response: See attached photo simulations. This included existing and proposed views from (3) distinct viewpoints as well as a reference map of view locations.*
- Documentation of efforts to collocate on existing facilities.
  - *Response: See related section in project description above. As this is a colocation it has met the highest priority siting criteria.*

## **Code analysis (Lake Forest Park Municipal Code Title 18, chapter 18.68)**

### **SITING OF WIRELESS COMMUNICATION SERVICE FACILITIES**

#### **8.68.070 Prioritized locations.**

The following sites are prioritized in order of preference for locating proposed WCFs and permits shall be issued so that WCFs will be located on the highest priority site feasible:

##### **A. Collocation.**

- *Response: The result of this modification is to allow for the collocation of (2) new wireless facilities consolidated into an existing wireless facility. This achieves the city's highest siting priority.*

#### **18.68.080 Development standards.**

All WCFs shall be constructed or installed according to the following development standards:

A. Applicable Federal Communications Commission (FCC), Federal Aviation Administration (FAA), state and city regulations and standards.

- *Response: The tower owner has a regulatory department that ensures compliance with all federal regulations concerning FCC, FAA, and environmental regulatory concerns prior to allowing construction of any new facility. FAA compliance is demonstrated in the attached FAA Federal Airways & Airspace analysis.*

B. Antennas shall be located, mounted and designed so that visual and aesthetic impacts upon surrounding land uses and structures are minimized, and so that they blend into the existing environment. Panel and parabolic antennas shall be screened from residential views and public rights-of-way.

- *Response: The proposed replacement structure is a monopine meant to blend into the adjacent stand of trees in nearby heavily foliated area. The antennas will be painted green and covered in antenna concealment "socks" that will help them blend into the branches of the monopine.*

C. WCFs shall be screened or camouflaged employing the best available technology, such as compatible materials, location, color, artificial trees and hollow flagpoles, and other tactics to minimize visibility of the facility from public streets and residential properties.

- *Response: See response to "B" above.*

1. A freestanding WCF shall not be allowed whenever an existing structure can meet technical and network location requirements.

- *Response: The proposal is the replacement of an existing wireless facility to allow the collocation/consolidation of multiple existing and proposed WCFs into a single facility. No new freestanding structures are proposed.*

2. Monopoles shall be the only freestanding support structures allowed in the city, and they are the preferred structure where any support structure is necessary.

- *Response: The monopine structure complies as a monopole based free-standing structure that includes additional camouflage elements of the pine branches.*

3. A freestanding WCF shall comply with all required setbacks of the zoning district in which it is located.

- *Response: The replacement pole will roughly be a similar distance from the property line as the existing structure and centered within the lease area of the facility to contain the antennas and tree branches of the monopine within the lease area below. The tower base will be beyond the minimum 5' side yard setback from the property line.*

4. A WCF shall be designed and placed or installed on the site in a manner that takes maximum advantage of existing trees, mature vegetation, and structures by:
  - a. Using existing site features to screen the WCF from prevalent views; and
  - b. Using existing site features as a background in a way that the WCF blends into the background.

➤ *Response: The proposed replacement structure is a monopine meant to blend into the adjacent stand of trees in the nearby heavily foliated area.*
5. As a condition of permit approval, the city may require the applicant to supplement existing trees and mature vegetation to screen the facility.

➤ *Response: See landscaping section in project description.*
6. A WCF shall be painted either in a nonreflective color or in a color scheme appropriate to the background against which the WCF would be viewed from a majority of points within its viewshed, and which must be approved by the city.

➤ *Response: Facility is a monopine meant to blend into the surrounding tree line and is demonstrated in the attached photo simulations.*

D. Equipment facilities shall:

1. Be placed underground if practicable; or
2. If above ground, equipment facilities shall be screened from any street and adjacent property with fencing, walls, landscaping, structures or topography or a combination thereof; and
3. They shall not be located within required building setback areas.

E. Security fencing shall:

1. Not exceed six feet in height.
2. Be screened from view through the use of appropriate landscaping materials; and
3. Be camouflaged with appropriate techniques and painted or coated with a nonreflective color, if it is a chain-link fence.

➤ *Response: The existing facility has outdoor equipment located at grade level within a fenced compound. The fence between the adjacent parcel and the compound is the 12' high security fence that surrounds the existing water reservoir. This fence is the property of the Seattle Public Utilities to provide security to the public reservoir facility and does not belong to the applicant to make any modifications to save for the placement of additional access gates.*

➤ *See above section in landscaping section of project description regarding landscaping and screening specifics.*

➤ *All existing and proposed equipment cabinets will be outside of the 5' side yard setback of the property line with only utility infrastructure being within that setback area.*

➤ *The portion of the fence owned by the wireless facility separating the facility from the surrounding water reservoir is 6' tall, as required.*

F. The city shall consider the cumulative visual effects of WCFs mounted on existing structures and/or located on a given permitted site in determining whether the additional permits can be granted so as to not adversely affect the visual character of the city.

- *Response: We believe we have made all reasonable efforts to minimize the visual effects of the modified existing WCF taking into account the limitations in which we are working.*

G. A WCF shall not be used for mounting signs, billboards, or message displays of any kind. (Ord. 773 § 3, 1999)

- *Response: The facility will not have any billboard, messages, or signage aside from signage required by the FCC and site identification signage at the ground equipment needed for site identification and network operations center contact.*

Please feel free to contact me if any further information or items are needed to complete your review.

Sincerely,



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