



City of Seattle

Department of Planning and Development

D. M. Sugimura, Director

**CITY OF SEATTLE  
ANALYSIS AND DECISION OF THE DIRECTOR  
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**Application Number:** 3012204  
**Applicant Name:** Tiffany McClurg of Telecom Consulting for ATT  
**Address of Proposal:** 610 SW Roxbury St.

**SUMMARY OF PROPOSED ACTION**

Land Use Application to allow an expansion of a minor communication utility (AT & T) consisting of three additional panel inside a 60 ft monopole. Ancillary equipment is to be installed near the base of the structure.

The following approvals are required:

**SEPA - Environmental Determination -** Seattle Municipal Code (SMC) 25.05.

**Administrative Conditional Use** – to expand a minor communication utility in an LR-3 zone (SMC 23.57.011B).

**SEPA DETERMINATION:**  Exempt  DNS  MDNS  EIS  
 DNS with conditions  
 DNS involving non-exempt grading, or demolition,  
or another agency with jurisdiction.

**BACKGROUND DATA**

**Site and Vicinity Description**

The property is zoned SF7200 and is the site of an existing religious institution and an existing minor communication utility, primarily installed within a hollow 60 foot monopole structure. The site measures approximately 72,225 square feet. A portion of the site is mapped as an environmentally critical area for steep slope.

The telecom facility is located on a gentle knoll slightly northwest of the center of the site. Properties to the east, west and north are also zoned SF 7200. Properties south of the site, across Roxbury St, are outside the Seattle City limits in unincorporated King County. Most properties in the area are developed with residential structures.

### Public Comments

No written comments were received.

### SEPA ANALYSIS

The initial disclosure of the potential impacts from this project was made in the environmental checklist submitted by the applicant. The information in the checklist and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.554D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans, and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

The Overview Policy states, in part: “Where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation,” subject to some limitations. Under such limitations/circumstances (SMC 25.05.665 D1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

### Short-term Impacts

The following temporary construction-related impacts are expected: 1) decreased air quality due to the increase dust and other suspended particulates from minor construction activities; 2) increased noise and vibration from construction operations and equipment; 3) increased traffic and parking demand from construction personnel; 4) potential brief blockage of portions of streets by construction vehicles/activities; 5) increased greenhouse gas emissions due to construction-related activities; and 6) consumption of renewable and non-renewable resources.

Although not significant, the impacts are adverse. City codes and/or ordinances apply to the proposal and will provide mitigation for some of the identified impacts. Specifically, these are: 1) Street Use Ordinance (watering streets to suppress dust, obstruction of the pedestrian right-of-way during construction, construction along the street right-of-way, and sidewalk repair); and 2) Building Code (construction measures in general). Compliance with these applicable codes and ordinances will be adequate to achieve sufficient mitigation and further mitigation by imposing specific conditions is not necessary for these impacts. No disturbance of the mapped environmentally critical area is proposed and no new impervious surface will be added to the site. The other short-term impacts not noted here as mitigated by codes, ordinances or conditions (e.g., increased traffic during construction, additional parking demand generated by construction

personnel and equipment, increased use of energy and natural resources, increased greenhouse gas emissions) are not sufficiently adverse to warrant further mitigation or discussion.

### Long-term Impacts

Long-term or use-related impacts are also anticipated, as a result of approval of this proposal including: increased traffic in the area and increased demand for parking due to maintenance of the facility; and increased demand for public services and utilities. These impacts are minor in scope and do not warrant additional conditioning pursuant to SEPA policies.

### Environmental Health

The applicant has submitted a “Statement of Federal Communication Commission Compliance for Personal Wireless Service Facility” and an accompanying “Affidavit of Qualification and Certification” for this proposed facility giving the calculations of radiofrequency power density at roof and ground levels expected from this proposal and attesting to the qualifications of the Professional Engineer who made this assessment. This complies with the Seattle Municipal code Section 25.10.300 that contains Electromagnetic Radiation standards with which the proposal must conform. Furthermore, the Federal Communications Commission (FCC) has pre-empted state and local governments from regulating personal wireless service facilities of this size on the basis of environmental effects of radio frequency emissions. As such, no mitigation measures are warranted pursuant to the SEPA Overview Policy (SMC 25.05.665).

### Height, Bulk and Scale

The addition of the antennas inside the existing hollow monopole will not be visible and therefore will not contribute to any height, bulk or scale impacts. Minor equipment installation will occur near ground level around the base of the monopole. This equipment will be added to existing equipment within an existing fenced area which acts as a screened enclosure. Post-construction, the minor communication utility would simply appear to much as it does today. This is the type of proposal which, after installation, is likely to be overlooked by neighbors and passersby. No mitigation is warranted.

### Greenhouse Gas

Ongoing operation of the expanded minor communication utility may result in a slight increase in electrical energy consumption which may be generated, in part, by processes which directly or indirectly result in increased greenhouse gas emissions somewhere. While these emissions appear to be adverse, they are extremely minimal to the point of being de minimis. No mitigation is warranted.

### Noise

The proposal includes an equipment cabinet which is expected to emit some low-level noise when it is in operation. Since the project proposes to attenuate the sound by locating the equipment inside the fenced area approximately 85 feet from the nearest neighboring property line, no mitigation for noise impacts is warranted.

### **DECISION - SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030 (2) (C).
- [ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030 (2) (C).

### **CONDITIONS - SEPA**

None.

### **ADMINISTRATIVE CONDITIONAL USE - ANALYSIS**

*The establishment or expansion of a minor communication utility regulated pursuant to Section 23.57.010.C.2, may be permitted as an Administrative Conditional Use when they meet the following criteria, as applicable:*

- a) *The proposal shall not be significantly detrimental to the residential character of the surrounding residentially zoned area, and the facility and the location proposed shall be the least intrusive facility at the least intrusive location consistent with effectively providing service. In considering detrimental impacts and the degree of intrusiveness, the impacts considered shall include but not be limited to visual, noise, compatibility with uses allowed in the zone, traffic, and the displacement of residential dwelling units.*

The proposal will include screening of the additional proposed antennas inside an existing hollow monopole supporting a minor communication utility. If the proposal had only included installation of all of the new elements of the utility, including supporting equipment, inside of the monopole structure, the installation would have been permitted outright without need for Administrative Conditional Use Permit per SMC 23.57.009B. Due to the large setbacks from property lines and screening behind existing fencing and vegetation, it is unlikely that the installation of the ancillary equipment will be perceptible after the installation process is complete. Therefore, the proposal will arguable be no more intrusive than the existing condition. No additional visual, noise, compatibility issues, traffic or residential displacement are anticipated.

- b). *The visual impacts that are addressed in Section [23.57.016](#) shall be mitigated to the greatest extent practicable.*

The proposal mitigates visual impacts to the greatest extent practicable.

- c) *Within a Major Institution Overlay District, a Major Institution may locate a minor communication utility or an accessory communication device, either of which may be larger than permitted by the underlying zone, when:*

*(1) The antenna is at least one hundred (100) feet from a MIO boundary, and*

*(2) The antenna is substantially screened from the surrounding neighborhood's view.*

This criterion is not applicable as the site is not within a Major Institution Overlay District.

- d). *If the minor communication utility is proposed to exceed the permitted height of the zone, the applicant shall demonstrate that the requested height is the minimum necessary for the effective functioning of the minor communication utility and construction of a network of minor communication utilities that consists of a greater number of smaller less obtrusive utilities is not technically feasible.*

The installation of antennas is permitted outright within the existing structure. The installation of exterior ancillary equipment will be located near ground level. This criterion is satisfied.

- e). *If the proposed minor communication utility is proposed to be a new freestanding transmission tower, the applicant shall demonstrate that it is not technically feasible for the proposed facility to be on another existing transmission tower or on an existing building in a manner that meets the applicable development standards. The location of a facility on a building on an alternative site or sites, including construction of a network that consists of a greater number of smaller less obtrusive utilities, shall be considered.*

This criterion is not applicable as the proposal does not include a new freestanding transmission tower.

- f). *If the proposed minor communication utility is for a personal wireless facility and it would be the third separate utility, or any subsequent separate utility after the third utility, on the same lot, the applicant shall demonstrate that it meets the criteria contained in subsection [23.57.009.A](#), except for minor communication utilities located on a freestanding water tower or similar facility.*

This proposal is to expand an existing minor communication utility which is not the third or subsequent utility on the same lot.

**ADMINISTRATIVE CONDITIONAL USE - DECISION**

The applicant has demonstrated that the proposed facility is the least intrusive facility in the least intrusive location. Screening requirements and other development standards are met. Therefore, the Administrative Conditional Use Permit is **GRANTED**.

**ADMINISTRATIVE CONDITIONAL USE - CONDITIONS**

None.

Signature: \_\_\_\_\_ (signature on file)  
Jerry Suder, Land Use Planner  
Department of Planning and Development

Date: February 13, 2012