



Directors Rule for Design Standards for Small Wireless Facilities on Poles in the Public Place

Seattle, Washington

SEPA Checklist

January 9, 2020

STATE ENVIRONMENTAL POLICY ACT (SEPA) ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project, if applicable:

Director's Rule for Design Standards for Small Wireless Facilities on Poles in the Public Place

2. Name of applicant:

City of Seattle Department of Transportation (SDOT)

3. Address and phone number of applicant and contact person:

Alyse Nelson
Seattle Department of Transportation
P.O. Box 34996
Seattle, WA 98124-4996
206-684-5968
Email: telecom.wireless@seattle.gov

4. Date checklist prepared:

January 9, 2020

5. Agency requesting checklist:

SDOT

6. Proposed timing or schedule (including phasing, if applicable):

The Director's Rule for Design Standards for Small Wireless Facilities (SWF) on Poles in the Public Place will go into effect in Q1 2020. SWFs proposed in the public right-of-way after the Director's Rule becomes effective would need to comply with the Director's Rule.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The City anticipates updates to this Director's Rule may be needed as technology changes, as the City receives alternative designs for approval, and based on feedback from internal and external stakeholders, the carriers, and the public.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The City has permitted over 500 SWFs of which over 300 have been installed (see Attachment 1 for project examples). Seattle City Light has developed the following construction standards for these permitted projects:

- Pole Attachments, Small Cell Antenna and Distributed Antenna System (DAS) Below Distribution Conductors
- Pole Attachments, Pole Top Cellular Antennas
- Collocated Small Wireless Facilities on Metal Streetlight Poles

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None.

10. List any government approvals or permits that will be needed for your proposal, if known.

The Director's Rule will require approval from the SDOT director. SWF attachments must adhere to all applicable federal, state, and City codes, laws, standards, and regulations, including the National Electrical Safety Code; Seattle Municipal Code (SMC) Title 15 (Street and Sidewalk Use) if the SWF would be in a public right-of-way; SMC Title 23 (Land Use Code); and SMC Title 25 (Environmental Protection and Historic Preservation). Future activities will continue to require permits and review as provided for in the Sidewalk and Street Use Code. If located within a Historical, Landmark, or other Special Review District, approval by the relevant Board may be required. SWFs proposed in the Waterfront Seattle Project Area must have approval from the Office of the Waterfront. SWFs on existing poles within public right-of-way require approval from the pole owner such as Seattle City Light, SDOT, Metro, or CenturyLink.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

This is a non-project proposed rule by SDOT that provides design standards for attaching SWFs to poles within City of Seattle right-of-way on both public and private poles. SWFs are already allowed and exist in the public right-of-way and must comply with Seattle City Light standards where applicable and require permits and review as provided for in the Sidewalk and Street Use Code. Existing individual SWF proposals are typically exempt under SEPA per SMC 25.05.800.AA. The Director's Rule is not expected to result in an increase or decrease in the number of SWFs, just to limit their appearance and location in the public right-of-way consistent with the proposed design standards. These design standards were reviewed by an interdepartmental team of experts and stakeholders involved in the approval process for allowing SWFs in the public right-of-way.

Specific design standards are described for wood and metal poles for the height of replacement poles, top-mount and side mount canister and panel antennas, pole diameters, accessory equipment locations, and cabling and conduit (see Attachment 2 for diagrams of design standards). While most accessory equipment for SWFs would be mounted on poles some proposals may require equipment to be placed underground or at grade. New poles in the public right-of-way will only be considered if the applicant can establish that the

proposed SWF cannot be located on an existing or replacement pole or on a structure on private property. Antennas and equipment should match the aesthetics of the pole and surrounding poles including the color and should minimize visible equipment through undergrounding or pole-mounting. At-grade accessory equipment may be considered only where undergrounding or pole-mounted equipment is not technically feasible. Preferred SWF designs do not require additional accessory equipment or only the minimum necessary for installation. When required, all accessory equipment, except the disconnect, should be undergrounded or mounted inside a cabinet lower on the pole. In the Waterfront Seattle Project Area attachments to wood poles, pole-mounted or at-grade communication cabinets, and panel antennas are prohibited (see Attachment 3 for location of Waterfront Seattle Project Area).

There are also standards applicable to SWFs on all poles in public right-of-way. Facilities must meet *Streets Illustrated* standards, ADA requirements, and must not obstruct, impede, or hinder pedestrian, bicycle, or vehicular travel. Replacement poles must match the approximate design, color, and materials of the existing pole and be located as close as possible. All luminaires must be at the same height as adjacent streetlights. To the greatest extent feasible equipment must be oriented away from adjacent windows, doorways, or entrances, and equipment cabinets should be on the street side of poles where feasible. The use of a pole for the siting of a SWF must be considered secondary to the primary function of the pole. All SWF attachments to poles must be approved by the pole owner. The City has developed an optional preapproved alternative design process for proposals that seek to deviate from these standards.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

This is a non-project proposal that pertains to SWFs proposed within City of Seattle right-of-way. SWFs not installed in the public right-of-way are not subject to these requirements, but these standards may inform those installations. SWFs are not allowed on poles within medians or traffic islands, traffic signal poles, pedestrian light poles, poles with globe-light luminaires, decorative poles, new privately-owned poles, or poles within an approved street concept plan.¹

There are additional siting restrictions in the Waterfront Seattle Project Area including prohibition within an intersection, separation from an intersection by a tree, a minimum distance of 12 feet from a tree, and prohibition within the Waterfront Promenade (defined as west of the bike facility). When assessing proposed siting locations in the Waterfront Seattle Project Area, the applicant must submit photo simulations of each facility and describe how the proposal addresses the cumulative visual effects.

SWF attachments are preferred on poles that are outside of Seattle Parks and Recreation's (SPR's) Boulevards, the Waterfront Seattle Project Area, Historic or Landmark Districts, and

¹ <https://streetsillustrated.seattle.gov/urban-design/street-concept-plans/list-of-approved-street-concept-plans/>

not adjacent to a designated Landmark. SWFs within designated shoreline areas must comply with SMC 23.60A, Seattle Shoreline Master Program Regulations. Certain areas in the City have been designated as underground ordinance areas and proposals for attachments to poles in these areas must comply with the ordinance. All areas within the Waterfront Seattle Project Area are designated as underground areas and no overhead wires other than seasonal art displays are allowed. Applications for SWFs in non-preferred locations must obtain applicable approvals and provide evidence that due to technical infeasibility or the unavailability of an alternative location for the SWF, the facility cannot be located on an existing or replacement pole in approved locations.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way, except for right-of-way discussed above in Section A.12. Seattle's public right-of-way consists of flat, rolling, hilly, and steep slopes. All potential sites proposed by this non-project proposal would occur within public right-of-way.

b. What is the steepest slope on the site (approximate percent slope)?

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way, which contains slopes that generally range from flat to above 20%. There are no restrictions for SWFs specific to steep slopes.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities that require soil removal. This may include minor excavation for a proposal to install accessory equipment for an attachment underground. There are numerous types of soils found throughout the public rights-of-way, but none are agricultural or of long-term commercial significance.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are indications and a history of unstable soils in certain locations within public right-of-way. These locations have been designated by the City as environmentally critical areas and are subject to development restrictions. This non-project proposal applies to SWFs proposed within Seattle's public right-of-way and does not authorize construction of SWFs. Future individual proposals may install wireless facilities within the immediate vicinity of unstable soils. Applications for SWFs within or near unstable soils considered to be environmental critical areas must comply with SMC 25.09.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate the source of fill.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities that require filling, excavation, or grading. It is anticipated that ground disturbance required for installing replacement or new poles or attachments underground would be minimal.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require work resulting in erosion. It is anticipated that runoff resulting from individual proposals would be minimal.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities that increase the amount of impervious surfaces. It is anticipated that any increase in impervious surfaces from poles or attachments would be minimal.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals could involve ground disturbance and associated runoff to accommodate SWFs. SDOT would require any future proposals to comply with the Stormwater Code and other applicable federal, state, and local regulations. This non-project proposal will not result in significant adverse impacts to earth resources.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may require construction vehicles and equipment to install SWFs that results in fugitive dust from ground disturbance activities. The non-project proposal is intended to establish non-vehicle activity use of the right-of-way and is not expected to have a significant adverse impact on air quality.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

There are no sources of emissions or odor that may affect the proposal.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. SDOT would require any future proposals to comply with applicable federal, state, and local air quality regulations to minimize impacts. This non-project proposal will not result in significant adverse emissions or other impacts to air.

3. Water

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Several water bodies are near public right-of-way within the City of Seattle.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require work within 200 feet of waterbodies.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to place fill or dredge materials in surface waters or wetlands.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to require surface water withdrawals or diversions.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to be within a 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to discharge waste materials to surface waters.

b. Ground:

1) Will ground water be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to withdraw ground water.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals . . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would not be expected to discharge waste materials.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities that results in runoff. It is anticipated that runoff resulting from individual proposals would be minimal.

2) Could waste materials enter ground or surface waters? If so, generally describe.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require work generating waste materials that has the potential to enter ground or surface waters. It is anticipated that ground disturbance required for installing replacement or new poles or attachments underground would be minimal and not likely impact ground or surface waters.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities that affect drainage patterns in the vicinity.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals could involve ground disturbance to accommodate SWFs. SDOT would require any future proposals to comply with the Stormwater Code and other applicable federal, state, and local regulations. This non-project proposal will not result in significant adverse surface water, groundwater or stormwater runoff impacts.

4. Plants

a. Types of vegetation found on the site: [Check the applicable boxes]

Deciduous tree: alder, maple, aspen, other

Evergreen tree: fir, cedar, pine, other

Shrubs

Grass

Pasture

Crop or grain

Wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other

Water plants: water lily, eelgrass, milfoil, other

Other types of vegetation

Most terrestrial vegetation types listed above could be found in the planting strip or other unpaved portions of the public right-of-way in the City of Seattle, where SWFs could be installed.

b. What kind and amount of vegetation will be removed or altered?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require removal or alteration of vegetation.

c. List threatened or endangered species known to be on or near the site.

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. Poles are typically located in a developed, urban environment in paved and landscaped right-of-way where there is no endangered species habitat. This proposal will not have probable significant adverse impacts to threatened or endangered species.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals could involve the removal or alteration of vegetation to accommodate SWFs. SDOT would review this proposal for appropriateness given the conditions and street design, and in consultation with the SDOT Urban Forestry division, which oversees vegetation in the right-of-way. Approval of sites for permitted activities subject to the provisions of this non-project proposal are not expected to result in probable significant adverse impacts to plants.

e. List all noxious weeds and invasive species known to be on or near the site.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities near noxious weeds or invasive species.

5. Animals

a. Birds and animals which have been observed on or near the site or are known to be on or near the site: [Check the applicable boxes]

Birds: Hawk Heron Eagle Songbirds

Other: (identify): Birds that are likely to be found in the area include common urban species such as crows, pigeons, doves, starlings, and house sparrows.

Mammals: Deer Bear Elk Beaver

Other:(identify): Mammals that may be found in the project area would include rats, squirrels, and raccoons.

Fish: Bass Salmon Trout Herring

Shellfish Other: (identify) The proposal would not permit uses on the water.

Animals listed above could be found in the planting strip or other portions of the public right-of-way in the City of Seattle where SWFs may be permitted if siting conditions are met.

b. List any threatened or endangered species known to be on or near the site.

Threatened or endangered species are not expected to be found within the public right-of-way.

c. Is the site part of a migration route? If so, explain.

Seattle's public right-of-way is developed and urban in character. Seattle is within the Pacific Flyway, one of the four principal north-south migration routes for birds (including Canada geese, herons, and other birds) in North America. The Pacific Flyway encompasses the entire Puget Sound Basin.

d. Proposed measures to preserve or enhance wildlife, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Seattle's public right-of-way is developed and urban in character. Approval of sites for permitted activities subject to the provisions of this non-project proposal are not expected to result in probable significant adverse impacts to birds, mammals, or fish; birds migrating along the Pacific Flyway; or threatened or endangered species.

e. List any invasive animal species known to be on or near the site.

Invasive species are not expected to be found in the vicinity of the public right-of-way.

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may require construction vehicles and equipment to install SWFs.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The proposed Director's Rule includes height requirements and other design guidelines for SWFs that will limit changes to height and bulk of structures associated with new

SWF installations. This would limit impacts SWFs may have on adjacent properties' potential use of solar energy.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Any potential energy impacts will be addressed during review of Street Use permit applications on a site-specific basis. SDOT would require any future proposals to comply with applicable federal, state, and local regulations. Approval of sites for permitted activities subject to the provisions of this non-project proposal are not expected to result in probable significant adverse impacts to energy or natural resources.

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require construction activity that has the potential to result in environmental health hazards.

- 1) Describe any known or possible contamination at the site from present or past uses.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require construction activity within a known or possible contaminated site.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may be affected by existing hazardous chemicals/conditions.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and require construction activity that produces or releases toxic or hazardous substances, such as mechanical fluids.

4) Describe special emergency services that might be required.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to result in an increased need for emergency medical services, Seattle Police Department, or Seattle Fire Department.

5) Proposed measures to reduce or control environmental health hazards, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities and have the potential to result in environmental health hazards. SWFs must comply with applicable federal laws, rules, regulations, and standards regarding radio frequency exposure and electrical safety. This non-project proposal will not result in probable significant adverse environmental health impacts.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Ambient noise typical of urban areas exists in Seattle's public right-of-way.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Any noise generated as part of SWFs in Seattle's public right-of-way would be similar to existing conditions.

3) Proposed measures to reduce or control noise impacts, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. SWFs and accessory equipment, including but not limited to cooling fans, are required to comply with City noise standards (SMC 25.08). This non-project proposal will not result in probable significant adverse noise impacts.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

This non-project proposal applies to all of Seattle's public right-of-way, which is used for the benefit of the traveling public. Sites within the right-of-way are generally used for

purposes associated with transportation, mobility, and utilities. Any attachments to poles within public right-of-way must comply with design guidance and be approved by the City and other applicable agencies. There is additional design guidance and siting restrictions in the Waterfront Seattle Project Area. Proposed design guidance is meant to ensure that SWFs are consistent with uses within and adjacent to the public right-of-way. The non-project proposal would not result in any probable significant adverse land use impacts.

- b. Has the site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or non-forest use?**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way, which does not contain working farmlands or forestlands.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way, which is not in the vicinity of working farm or forest land.

- c. Describe any structures on the site.**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. There are many structures existing within Seattle's public right-of-way.

- d. Will any structures be demolished? If so, what?**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. Future individual proposals may require the demolition of structures within the public right-of-way.

- e. What is the current zoning classification of the site?**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. City of Seattle's rights-of-way are located adjacent to all City zoning designations.

- f. What is the current comprehensive plan designation of the site?**

This non-project proposal applies to SWFs proposed within Seattle's right-of-way. City of Seattle's rights-of-way are located adjacent to all City comprehensive plan designations.

- g. If applicable, what is the current shoreline master program designation of the site?**

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way, which is adjacent to or within all of Seattle's shoreline districts. SWFs must comply with SMC 23.60A, Seattle Shoreline Master Program Regulations.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. Some of Seattle's rights-of-way are located in environmentally critical areas. Future individual proposals may be located within or adjacent to environmental critical areas and must comply with SMC 25.09.

i. Approximately how many people would reside or work in the completed project?

This non-project proposal applies to SWFs proposed within Seattle's public right-of-way. No change in residence or employment in the right-of-way or abutting property is anticipated.

j. Approximately how many people would the completed project displace?

This non-project proposal will not have displacement impacts.

k. Proposed measures to avoid or reduce displacement impacts, if any:

This non-project proposal will not have displacement impacts.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

This non-project proposal is intended to minimize impacts within Seattle's public right-of-way by requiring small wireless companies to utilize existing or replacement poles where feasible. New poles in the public right-of-way will only be considered if the applicant can establish that the proposed SWF cannot be located on an existing or replacement pole or structure on private property. The non-project proposal is consistent with Comprehensive Plan (2019) goals related to Utilities and Neighborhood Plans, including the following:

- Goal U G1: *Provide safe, reliable, and affordable utility services that are consistent with the City's aims of environmental stewardship, race and social equity, economic opportunity, and the protection of public health.*
- Goal U G3: *Site and design facilities so that they help to efficiently and equitably provide services to all Seattleites and provide value to the communities where they are located.*
- Goal U G5: *Work with non-City utilities to promote the City's overall goals for utility service and coordinated construction within the right-of-way.*
- Goal CA G5: *A community that is served by well-maintained infrastructure including the most up to date communication technology such as fiber optic telecommunication infrastructure.*
- Goal CA P24: *Improve the visual quality of the neighborhoods by encouraging undergrounding of utilities including service lines for all new construction and remodel projects and minimizing the impact of new telecommunication facilities such as towers.*

m. Proposed measures to ensure that the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

None.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

This non-project proposal will not provide housing units.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

This non-project proposal will not eliminate any housing units.

c. Proposed measures to reduce or control housing impacts, if any:

Not applicable. This proposal does not propose or eliminate any housing.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. The proposal would require new design standards for SWFs on existing and replacement poles within public right-of-way. SWFs must follow height design standards and the maximum height must include the SWF installation. Top-mount canister antennas must be at the pole top, while side-mount antenna attachments on wood poles are allowed above or below the luminaire arm and must not extend above the pole. Panel antennas on metal poles must be below the luminaire arm. See Attachment 1 for project examples and Attachment 2 for diagrams of design standards. New poles in the public right-of-way will only be considered if the applicant can establish that the proposed SWF cannot be located on an existing or replacement pole or structure on private property. New or replacement poles will be allowed to be 5 feet taller than existing metal poles and 10 feet taller than existing wood poles.

b. What views in the immediate vicinity would be altered or obstructed?

The proposal would allow attachments of SWFs on poles within public right-of-way. Attachments must follow design standards including maximum offsets from the pole surface and grade. Future individual proposals may alter or obstruct views depending on attachment placement on poles and the height of new or replaced poles.

c. Proposed measures to reduce or control aesthetic impacts, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Replacement poles from new proposals for SWFs must match the approximate design, color, and materials of the existing pole and be located as close as possible to the existing pole. Antennas and accessory equipment enclosures must match the aesthetics of the pole and surrounding poles and must comply with height limits. SWFs must comply with the dimensional standards and *Streets Illustrated* standards. Installations that do not require additional accessory equipment or equipment enclosures are preferred. When accessory equipment is necessary, it must be the smallest needed for installation. Where required, accessory equipment must be undergrounded or pole-mounted to the maximum extent feasible. New or replacement poles will be allowed to be 5 feet taller than existing metal poles and 10 feet taller than existing wood poles including facilities. Design standards would reduce the aesthetic impacts of replaced or new SWFs in the public right-of-way by creating consistency as well as height and size restrictions.

While orientation of antennas and other equipment may be limited by operational requirements, to the maximum extent possible, equipment must be oriented away from the greatest number of adjacent windows, doorways, or entrances. When assessing proposed siting locations within the Waterfront Seattle Project Area, the applicant must submit photo simulations and describe how the proposal addresses the cumulative visual effects. The non-project proposal would not result in any probable significant adverse aesthetic impacts.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Lighting is not permitted as part of SWFs and there are requirements to not interfere with the intended illumination pattern from existing poles. SWFs are not allowed on pedestrian light poles or poles with globe-light luminaires. SWFs on metal poles and all accessory equipment on wood and metal poles must be placed below the streetlight or streetlight arm.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Lighting specific to the SWF is not permitted. All luminaires must be at the same height as adjacent streetlights. Proposals must not interfere with the intended illumination pattern and a light analysis may be required if a replacement pole represents a change in location from the existing pole.

c. What existing off-site sources of light or glare may affect your proposal?

Ambient light and glare typical of urban areas presently exist in Seattle's right-of-way and will not affect the proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Design standards specific to SWFs in this non-project proposal are intended to minimize or eliminate light and glare impacts from new proposals. This non-project proposal will not result in probable significant adverse light or glare issues.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

There are parks and other designated and informal recreational opportunities within and near Seattle's public right-of-way areas.

b. Would the proposed project displace any existing recreational uses? If so, describe.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to result in the displacement of existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. If SWFs are proposed on SPR's Boulevards the applicant must submit documentation that they have evaluated the location preferences. The applicant must demonstrate that due to technical infeasibility the facility cannot be located on an existing or replacement pole outside of the Parks' Boulevard. SPR's approval is also required.

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites located on or near the project site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

There are eight historic districts and over 350 designated landmarks within the City of Seattle. Seattle's rights-of-way lie within historic districts and contain or abut designated landmarks.

- b. Are there any landmarks, features, or other evidence of Indian or historic use of occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

This non-project proposal applies to all of Seattle's public right-of-way and a proposed permitted activity may abut landmarks with historic, archaeological, scientific, or cultural importance.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the Department of Archaeology and Historic Preservation, archaeological surveys, historic maps, GIS data, etc.**

Seattle's public right-of way is developed and urban in character and the activities authorized by this non-project proposal will occur in Seattle's public right-of-way and will only allow SWFs on poles.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance of resources. Please include plans for the above and any permits that may be required.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. If SWFs are proposed in or adjacent to Historic or Landmark Districts or Buildings the applicant must submit documentation that they have evaluated the location preferences. The applicant must demonstrate that due to technical infeasibility the facility cannot be located on an existing or replacement pole outside of or within a certain proximity of the Historic or Landmark Districts or Buildings. Proposed SWFs located in or adjacent to Historic and Landmark Districts or Buildings must comply with the Landmark Preservation Ordinance. Areaways are included in Landmark and Historic District regulations and modifications to the areaway to accommodate SWFs and accessory equipment will require Landmark or Historic District review. Applicants must obtain a Certificate of Approval from the appropriate district board prior to permit issuance, and must align their design with the interests of relevant Historical Preservation Boards. When located in Landmark or Historic Districts, Board approval is required before a Street Use permit may be issued.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area, and describe proposed access to the existing street system. Show on site plans, if any.**

Seattle's right-of-way is composed of the existing street system, sidewalks, alleys, parking, and aboveground and belowground utilities and other structures such as bicycle racks and signage. This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would be located within the public right-of-way on existing, replacement or new

poles. Future individual proposals are not expected to impact the street system or interfere with street traffic, signage, or other transportation uses in the public right-of-way.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Seattle's public right-of-way is served by multiple public transit agencies including King County Metro, Sound Transit, and Community Transit. Proposed attachments to poles owned by King County Metro require their approval.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or non-project proposal eliminate?**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to result in new parking or the removal of parking.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to require improvements to roads or streets.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to affect water, rail, or air transportation.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?**

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to affect vehicular travel patterns.

- g. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No.

h. Proposed measures to reduce or control transportation impacts, if any:

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals must meet *Streets Illustrated* standards, ADA requirements, and must not obstruct, impede, distract, or hinder pedestrian, bicycle, or vehicular travel. This non-project proposal will not result in significant adverse transportation impacts.

15. Public services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals are not expected to result in an increased need for Seattle Fire Department, Seattle Police Department, SDOT, or Seattle-King County Department of Public Health services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. It is anticipated that this non-project proposal will not result in probable significant adverse impacts on public services.

16. Utilities

a. Utilities currently available at the site, if any: [Check the applicable boxes]

- None
 Electricity Natural gas Water Refuse service
 Telephone Sanitary sewer Septic system
 Other (identify)

Seattle's paved public right-of-way is extensively developed and is served by all the utilities listed above except for septic systems. Other utilities available include other communications services, cable television, and Internet access.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may install wireless facilities after receiving approval from the pole's owner such as Seattle City Light, SDOT, Metro, or CenturyLink. The use of a pole for the siting of a SWF must be considered secondary to the primary function of the pole. New poles in the public right-of-way will only be considered if the applicant can establish that the proposed

SWF cannot be located on an existing or replacement pole or on a structure on private property. At-grade communication cabinets must also comply with the requirements of SMC 15.32.200 and 15.32.250. It is anticipated that this non-project proposal will not result in probable significant adverse impacts on utilities.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:

Date Submitted:

D. SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. SWFs are already allowed and exist in the public right-of-way and must comply with Seattle City Light standards where applicable and require permits and review as provided for in the Sidewalk and Street Use Code. The Director's Rule is not expected to result in an increase or decrease in the number of SWFs, just to limit their appearance and location in the public right-of-way consistent with the proposed design standards. Future individual proposals may require construction vehicles and equipment to install SWFs potentially resulting in fugitive dust or runoff from ground disturbance activities. Construction activities may produce or release toxic or hazardous substances, such as mechanical fluids from construction equipment, and could temporarily generate noise.

Proposed measures to avoid or reduce such increases are:

Any potential impacts will be addressed during review of Street Use permit applications on a site-specific basis. SDOT's reviews will consider cumulative impacts to the right-of-way from proposals, including standards for location preferences, context and placement, concealment, noise, and lighting. SDOT would require any future proposals to comply with the Stormwater Code and other applicable federal, state, and local regulations including standards regarding radio frequency exposure and electrical safety. Noise-producing facilities that are covered under this proposed Director's Rule, such as cooling fans, are required to comply with City noise standards. The non-project proposal would not result in any probable significant adverse impacts to water, air, Greenhouse gas (GHG) emissions, noise, or additional release of hazardous substances.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may require ground disturbance that could require removal of vegetation or result in runoff to waterbodies.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Any potential impacts will be addressed during review of Street Use permit applications on a site-specific basis. SDOT would require any future proposals to comply with the Stormwater Code and other applicable federal, state, and local regulations. The non-project proposal would not result in any probable significant adverse impacts to plants, animals, fish, or marine life.

3. How would the proposal be likely to deplete energy or natural resources?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals may require construction vehicles and equipment to install SWFs.

Proposed measures to protect or conserve energy and natural resources are:

Any potential impacts to energy or natural resource use will be addressed during review of Street Use permit applications on a site-specific basis. The non-project proposal would not result in any probable significant adverse impacts to energy or natural resources.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, flood plains, or prime farmlands?

Environmentally sensitive areas can be found throughout the city and adjacent to public right-of-way. This includes areas which must comply with SMC 25.09 Regulations for Environmentally Critical Areas. This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Future individual proposals would primarily involve modifications or replacement of existing poles or new poles within paved right-of-way, as opposed to natural or undeveloped sites or adjacent structures. SWF attachments are also preferred on poles that are outside of Parks' Boulevards, the Waterfront Seattle Project Area, Historic or Landmark Districts and not adjacent to a designated Landmark. As a result, projects are not likely to have adverse effects on environmentally sensitive areas or areas designated for governmental protection.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Any potential impacts to environmentally sensitive resources will be addressed during review of Street Use permit applications on a site-specific basis. SDOT's reviews will consider cumulative impacts to the right-of-way from proposals, including standards for location preferences, context and placement, concealment, noise, and lighting. Applications for SWFs in SPR's Boulevards, Historic or Landmark Districts, or the Waterfront Seattle Project Area must obtain applicable approvals and provide evidence that due to technical feasibility or unavailability the facility cannot be located on an existing or replacement pole outside of these areas. Applications for SWFs within or near environmental critical areas must comply with SMC 25.09. The non-project proposal would not result in any probable significant adverse impacts to environmentally sensitive areas or other protected areas.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

This non-project proposal applies to all of Seattle's public right-of-way, which is used for the benefit of the traveling public. Sites within the right-of-way are generally used for purposes associated with transportation, mobility, and utilities. This non-project proposal does not involve construction activity. Any proposed SWFs within public right-of-way must comply with design guidance and be approved by the City and other applicable agencies. There is

additional design guidance and siting restrictions in the Waterfront Seattle Project Area.

Proposed measures to avoid or reduce shoreline and land use impacts are:

This non-project proposal is intended to minimize impacts within Seattle's public right-of-way by requiring small wireless companies to utilize existing or replacement poles where feasible. New poles in the public right-of-way will only be considered if the applicant can establish that the proposed SWF cannot be located on an existing or replacement pole or structure on private property. The proposal is consistent with Comprehensive Plan goals described in Section B.8.I. Proposed SWFs must comply with SMC 23.60A, Seattle Shoreline Master Program Regulations. SWFs proposed in the Waterfront Seattle Project Area must have approval from the Office of the Waterfront. This non-project proposal will not result in probable significant adverse impacts to existing land and shoreline uses.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

This non-project proposal provides design guidelines for SWFs that are proposed within Seattle's public right-of-way and does not authorize construction. Any proposed SWFs or attachments to poles within public right-of-way must comply with design guidance to minimize direct, indirect, and cumulative impacts to transportation and utilities and be approved by the City and other applicable agencies. There is additional design guidance and siting restrictions in the Waterfront Seattle Project Area. The proposal is not expected to substantially change demand for utility services or cause probable significant adverse impacts on public services or transportation.

Proposed measures to reduce or respond to such demand(s) are:

SWFs must meet *Streets Illustrated* guidelines, design restrictions, ADA requirements, and must not obstruct, impede, distract, or hinder usual pedestrian, bicycle, or vehicular travel. Applications for SWFs deviating from non-preferred locations must obtain applicable approvals and provide evidence that due to technical feasibility or unavailability the facility cannot be located on an existing or replacement pole in approved locations. This non-project proposal will not result in probable significant adverse impacts on transportation, public services, or utilities.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts are anticipated with local, state, or federal laws or requirements for protection of the environment.

Attachment 1

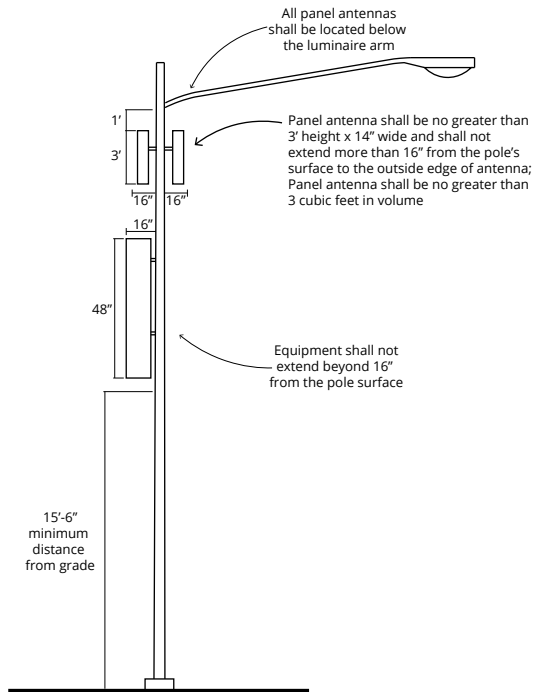
Typical wood pole design with panel antennas



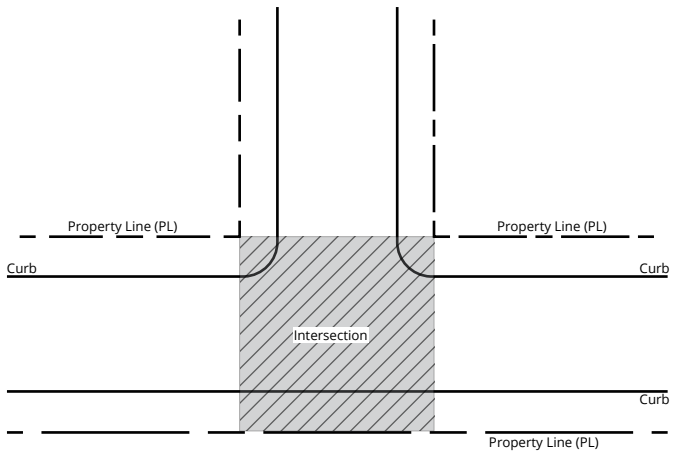
Metal pole in San Francisco (Google Street View)

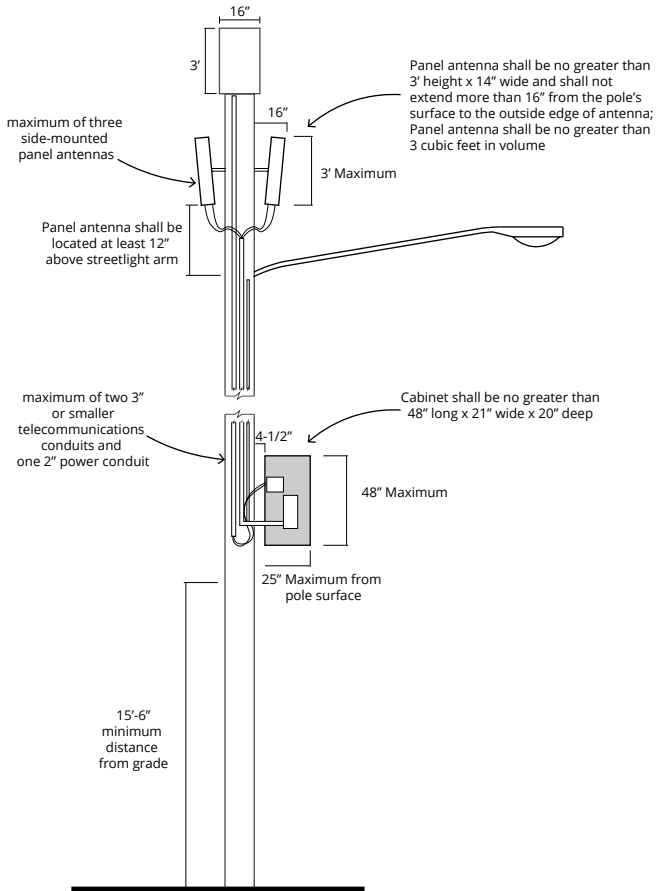


Attachment 2

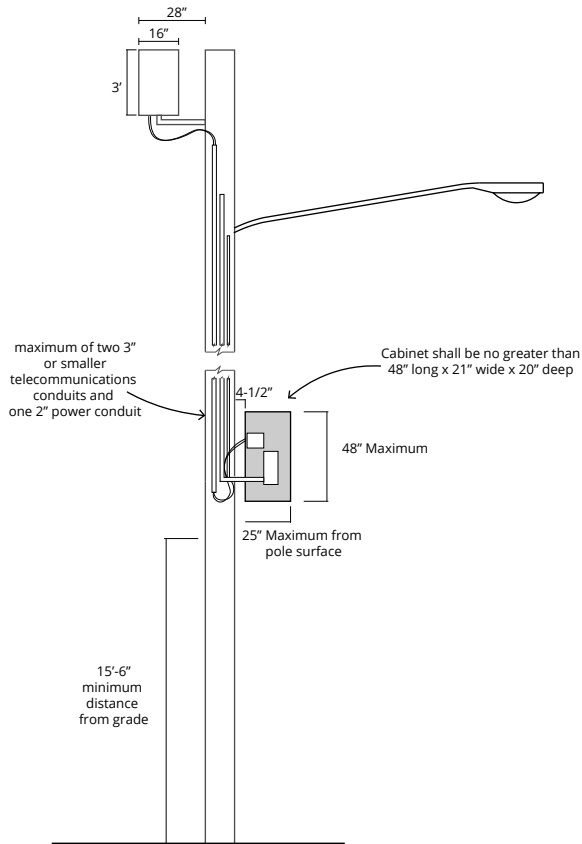


Metal Pole: Panel Antenna

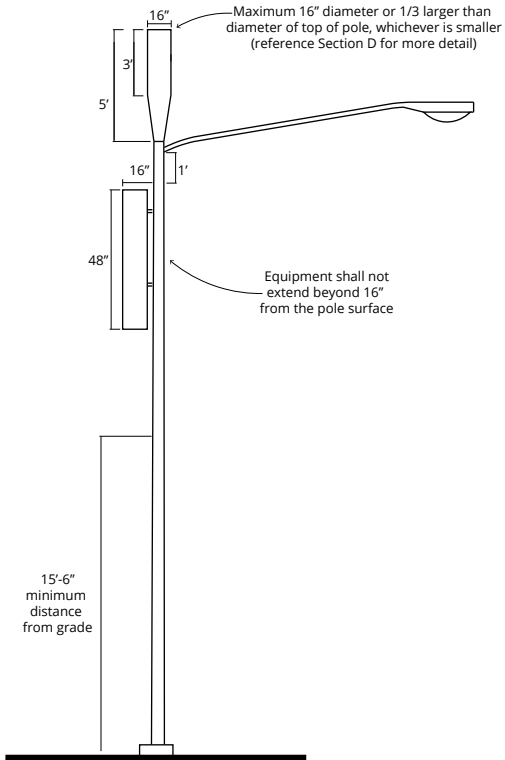




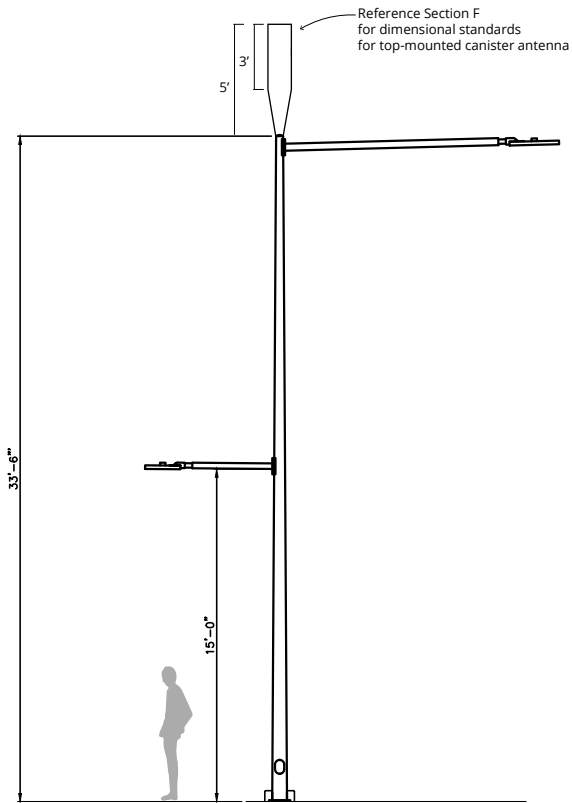
Wood Pole: Top-mounted Canister & Panel Antenna



Wood Pole: Side-mounted
Canister Antenna



Metal Pole: Top-Mount Canister Antenna



Waterfront Metal Pole:
Top-Mount Canister Antenna

Attachment 3

Waterfront Seattle Project Area

The area shaded is identified as the Waterfront Seattle Project Area and has supplementary design criteria and standards which apply to Small Wireless Facilities.

