

PROJECT NARRATIVE
TYPE III CONDITIONAL USE PERMIT, MINOR DESIGN REVIEW,
& CRITICAL AREA REVIEW APPLICATION
AT&T WCF—PS25 Camas School Relo

Submitted to City of Camas, WA
Planning Division

Applicant: New Cingular Wireless PCS, LLC (“AT&T”)
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Property-Owner: Camas Methodist Church
232 NW 19th Ave
Camas, WA 98607

Project Address: 706 NE 14th Ave
Camas, WA 98607

Description & Parcel: GPS Coordinates: 45.589689/ -122.403714
Parcel Number: 91010000

Zoning Classification: Residential (R-7.5)

Smartlink is submitting this application on behalf of New Cingular Wireless PCS, LLC (“AT&T”) and the underlying property owner, Camas Methodist Church.

1. PROJECT OVERVIEW

AT&T is proposing to build a new wireless communications facility (“WCF” or “Facility”), PS25 Camas School Relo, at 706 NE 14th Avenue, in the City of Camas. This proposed facility is intended to fill a significant gap in AT&T’s network coverage and service quality that will be left with the removal of AT&T’s existing facility at Garver Theater. Additionally, the candidate will provide new dominant 4G & 5G LTE coverage and enhanced capacity in the area including schools, residences, and businesses as well as along HWY 14.

As determined by AT&T’s RF engineers, see **Attachment 4—AT&T Radiofrequency (RF) Justification**, the proposed Facility meets AT&T’s service objectives to provide continuous and uninterrupted outdoor, in-vehicle, and in-building wireless service to the Targeted Service Area. This will result in fewer dropped calls and improved call quality, as well as access to additional wireless services (including emergency 911 calls).

AT&T will include the following documents with its Type III application for the proposed WCF (collectively, “AT&T’s Application”):

- Attachment 1—General Application Form
- Attachment 1a—Development Permit Form
- Attachment 1b—SEPA Checklist
- Attachment 2—Project Narrative (this document)
- Attachment 3—Statement of Code Compliance
- Attachment 4—AT&T Radiofrequency (RF) Justification
- Attachment 5—Alternative Sites Analysis
- Attachment 6—AT&T RF Safety Compliance Statement
- Attachment 7—Photo Simulations
- Attachment 8—Noise Study
- Attachment 9—AT&T Collocation Statement
- Attachment 10—AT&T FCC License
- Attachment 11—Geological Hazard Report
- Attachment 12—Floodplain Report
- Attachment 13—Critical Areas Habitat Assessment
- Attachment 14—Pre-Application Notes
- Attachment 15—Property Owner Letter of Authorization
- Attachment 16—Mailing List
- Attachment 17—Title Report
- Attachment 18—Setback Waiver Correspondence
- Attachment 19—Zoning Drawings

As shown in AT&T’s Application, this proposed Facility meets all applicable City of Camas Municipal Code (“CMC”) criteria for siting new wireless communications facilities and complies with all other applicable state and federal regulations. AT&T’s proposal is also the least intrusive means of meeting its service objectives for this site. Accordingly, AT&T respectfully requests that the City of Camas

approve this project as proposed, subject only to the city's standard conditions of approval for similar proposals.

Please Note: All references to "Attachments" in this Project Narrative are in reference to the above-noted attachments included as part of AT&T's Application.

2. PROPOSED PROJECT DETAILS

Detailed information regarding the subject property and proposed Facility is included in **Attachment 19—Zoning Drawings** and outlined below:

2.1 Site Description

- **Subject property.** The proposed WCF is located at 706 NE 14th Avenue in the City of Camas (the "Property"). The Property is owned by Camas Methodist Church.
- **Zoning—Use.** The Property is zoned as Residential (R-7.5) and is currently used as a religious facility with associated parking lot.
- **Lease area.**
 - The proposed 20ft x 20ft lease area for the WCF is abutting the eastern building façade in the existing parking lot. The lease area is inclusive of the proposed stealth bell tower.

2.2 Access, Parking, and Trip Generation

- **Access.** Access to the lease area will be via existing driveways off NE 14th Ave and NE Garfield St. These driveways will be replaced with commercial driveways meeting the one-way traffic City of Camas standards. Additionally, a 100ft section of the sidewalk between the driveways will be improved.
- **Parking.** Maintenance vehicles will be able to utilize the existing parking spaces within the parking lot. One (1) parking space will be removed with the proposed Facility.
- **Trip generation.** The WCF is an unmanned facility and may require approximately one trip per month for maintenance visits provided by personnel in a single vehicle. However, these visits could be reduced as it is becoming more common for these facilities to be monitored remotely. The proposed Facility will have no impact on existing vehicular access to and from the proposed site, or to pedestrian, bicycle, and transit circulation.

2.3 Wireless Facilities and Equipment

- **Tower design.** AT&T proposes to install a new 60ft stealth RF transparent structure designed to resemble a faux bell tower within the lease area (the "Tower").
 - All antennas and ancillary equipment, including ground equipment, will be housed internally within the faux bell tower.
 - The Tower will be treated with brick veneer to match the existing Camas Methodist building. The wireless communications facility itself will be 60ft, but there will be a spire and cross installed above the RF transparent structure at the request of the landlord. The proposed overall height of the structure is 88ft. This faux bell tower and spire will match the existing spire on the building.
 - Sufficient space will be made available for a minimum of one (1) additional antenna array for future collocation.

- **Tower antennas and equipment.**
 - The Tower will contain the following AT&T 4G & 5G LTE equipment:
 - Up to nine (9) panel antennas
 - Up to nine (9) Remote Radio Head (RRH) units
 - Up to one (1) Surge Suppressor
 - Fiber/ DC Cables
 - The antennas, RRHs, and ancillary equipment will be located internally within the Tower and will not be installed above 60ft in height.
- **Ground equipment.**
 - A 20ft x 20ft enclosed equipment room is proposed at the base of the Tower. The equipment room will be secured by a locked access door on the south side of the Tower.
 - AT&T proposes a 10ft x 14.5ft equipment area within the base of the Tower for the installation of three (3) indoor equipment racks to include a power rack, backup battery rack and a miscellaneous rack.
 - A 200 sq. ft. future carrier equipment area with a chain-link fence is also reserved within the equipment room.
- **Lighting.** No artificial lighting of the Facility is proposed.

2.4 Landscaping and Screening

- The existing shrubs on the eastern side of the building will be removed for the installation of the Tower. No landscaping is proposed since there is no ground equipment visible. Additionally, more parking spaces would be required to be removed for the installation of any new landscaping.

2.5 Utilities

- **Power.** Power is available via an existing utility pole to the north of the Property and will be trenched underground to the Facility.
- **Telecommunications.** Telecommunications fiber is available via an existing utility pole to the north of the Property and will be trenched underground to the Facility.
- **Water.** As this is an unmanned wireless facility, no water service is needed.
- **Sewer.** As this is an unmanned wireless facility, no sewer service is needed.

3. AT&T NETWORK COVERAGE AND SERVICES

3.1. Overview—AT&T Network Coverage and Services—5G & 4G LTE

AT&T is upgrading and expanding its wireless communications network to support the latest 5G and 4G LTE technology. 5G and 4G stand for “5th Generation” and “4th Generation” and LTE stands for “Long Term Evolution.” These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality—4G LTE offers speeds up to ten times faster than 3G and 5G offers speeds up to 1-gigabit per second. See **Attachment 4—AT&T Radiofrequency (RF) Justification.**

This technology is the next step in increasing broadband speeds to meet the demands of users and the variety of content accessed over mobile networks, and it is necessary to facilitate capabilities that are

being designed into the latest devices (*i.e.* Samsung Galaxy S20, iPhone 12). 5G, specifically, is the next generation of wireless technology expected to deliver latency and capacity enhancements that will enable revolutionary new capabilities for consumers and businesses.

There are several components of 5G wireless technology and separate bands of wavelength spectrum used to build a 5G network—low-band (<2GHz), mid-band (3-10GHz), and high-band millimeter wave (mmWave) (20-100GHz):

- **Low-band 5G.** Low-band 5G frequencies (generally below 2GHz) are the oldest cellular (and TV) frequencies and are being used by AT&T to provide widely-available 5G service in residential, suburban, and rural areas. This is the same spectrum used for 3G and 4G cellular service today. As noted below, **the low-band 850MHz 5G frequency is proposed for this Facility.**

Low-band 5G frequencies are a tradeoff of download speed versus distance and service area—they are slower than the high-band mmWave and mid-band frequencies (as described below), but they travel the farthest and can pass through more obstacles to provide a better, more reliable indoor and outdoor signal for a larger service area (*i.e.* miles, not feet).

- **Mid-band 5G+.** Mid-band 5G frequencies (generally 3-10GHz) provide a great combination of ultra-fast speeds and wide geographic coverage. This frequency fills the gap between the two current bands by traveling farther than high-band and providing faster speeds than low-band. However, fewer frequencies are available within this spectrum, so it is not as widespread as low-band 5G.
- **High-band 5G+ mmWave.** High-band millimeter wave (mmWave) frequencies (generally 20-100GHz) are the frequencies most associated with 5G service—"5G+" is AT&T's name for 5G service delivered using high-band mmWave spectrum. AT&T offers an enhanced wireless experience on 5G+ with mmWave service though with more limited coverage. Results continue to be impressive, with peak download speeds up to 1 gigabit per second (Gbps) – fast enough to stream 4K movies.

High-band mmWave frequencies deliver this unprecedented performance by transmitting a large amount of data more efficiently than 4G LTE, but can only travel short distances (~1,000ft). Accordingly, high-band mmWave sites need to be in close proximity to one another and are typically used in dense, high trafficked areas such as urban areas, stadiums/arenas, airports, manufacturing and healthcare centers, etc.

5G wireless technology also includes enhanced network radio protocols and other improvements in data transmission that allow the network to more efficiently use the same frequencies currently used today for 4G.

As noted, **AT&T is proposing to deploy low-band 850MHz 5G at this Facility.** Upon completion, the Facility will become part of AT&T's statewide and nationwide communications network. See **Attachment 4—AT&T Radiofrequency (RF) Justification.**

3.2. Network Service Objectives and Targeted Service Area for Proposed Facility

The Targeted Service Area is currently served by AT&T's existing facility on the Garver Theater rooftop, located at 1612 NE Garfield Street, Camas WA 98607. AT&T's lease will end on November 1st, 2028,

therefore, AT&T must remove their facilities by then. It is important to note that AT&T's network of facilities in the area has developed and matured around the existing site location, and replacing the site with a facility at a nearby location minimizes disruption to the existing wireless network. As such, the search ring is centered around the existing site to maintain existing coverage. Moving the Facility too far in any direction could disrupt existing coverage leaving significant gaps that do not exist today or interfere with other existing sites built around the existing facility. As such, the new proposed location is near the existing facility at Garver Theater to maintain the same coverage footprint. See **Attachment 4—AT&T Radiofrequency (RF) Justification**.

This proposed facility is intended to provide coverage replacement and fill a significant gap in AT&T's network coverage, capacity and mobility experienced by its customers in the City of Camas. As described in the Project Overview, the candidate will provide new dominant 4G & 5G LTE coverage in the City of Camas, including schools, residences, and businesses, as well as WA HWY 14 (collectively, the "Targeted Service Area"). This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area.

4. SEARCH RING

AT&T's RF engineers performed an RF engineering study—considering multiple objectives—to determine the approximate site location and antenna height required to best fulfill the noted service objectives within the Targeted Service Area. See **Attachment 4—AT&T Radiofrequency (RF) Justification, Figure A—Search Ring**.

As this is a service coverage site intended to replace and provide seamless coverage in a specific area, the proposed new Facility must be located within the identified search ring to be able to establish a dominant signal within the Targeted Service Area. If the proposed Facility cannot be located within the Search Ring, it would leave a significant gap in coverage once the existing Facility on Garver Theater is removed. This includes minimal 4G & 5G voice service necessary for customers to make and receive calls reliably.

Radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas; therefore, it is generally best to locate a facility near the center of the identified Search Ring and Targeted Service Area. The area around the site is primarily residential, leaving limited options for placement of a new facility. Additionally, south of the existing facility, there is a drop in elevation. Therefore, the proposed location of the Camas Methodist Church is the best location to meet the network objectives and minimize loss of existing coverage. Although the location of the proposed new WCF is not near the center, it is still within the identified expanded Search Ring (see **Attachment 4**) and will be able to establish a dominant signal within the Targeted Service Area.

5. ALTERNATIVE SITE ANALYSIS

AT&T generally considers all siting possibilities within, and adjacent to, a search ring to determine the best location for a new facility to meet the targeted service objectives. AT&T will first attempt to utilize

an existing tower or structure for collocation at the desired antenna height. If an existing tower or structure is not available or determined to be infeasible, AT&T will then propose a new tower.

For this proposed WCF, AT&T's construction and real estate group, with the assistance of outside consultants, thoroughly analyzed siting options and found that the proposed location is the only available property within the Search Ring that will meet AT&T's service objectives in the Targeted Service Area. See **Attachment 5—Alternative Sites Analysis** for a detailed analysis on other sites considered and reasons they were not feasible options.

6. APPLICABLE LAW

6.1. Local Codes

6.1.01. Zoning and Development Standards. Pursuant to the Camas Municipal Code ("CMC"), new wireless communication facilities in the Residential zone are permitted subject to a Type III Conditional Use Permit and must comply with the criteria in CMC 18.35 – Wireless Communication Facilities. Please see **Attachment 3—Statement of Code Compliance** for AT&T's demonstration of compliance with all applicable CMC provisions.

6.1.02. Comprehensive Plan. The proposed Facility satisfies several of the applicable goals and policies of the City of Camas Comprehensive Plan including, but not limited to Land Use, Critical Areas, Franchise Utilities and Economic Development. Wireless services are key to growing urban areas. Wireless demand is growing, and robust wireless networks are essential to businesses and residences throughout Camas. Approximately 70% of all U.S. households are wireless only¹, relying on the ability to use their phones and other wireless devices at work and at home, both indoors and outdoor (including for emergency purposes). As the population of the City of Camas increases and land development patterns change over time, the demand for urban services also increases and changes. These changes require that service providers, both public and private, plan for the provision of services in a coordinated manner.

- The proposed Facility forwards the intent of **Chapter 1: Land Use**, specifically **Policy LU-1.3**: "Maintain compatible use and design with the surrounding built and natural environments when considering new development or redevelopment." A wireless communication facility is a passive, unmanned use, that will not provide noise, dust, traffic, light and glare, or toxic fumes. The proposed "Facility" is a 60ft stealth bell tower designed to blend with the environment and appear to be a part of the existing church and not as a wireless communication facility, which will minimize the visual impact on the surrounding residential properties. See **Attachment 19—Zoning Drawings**.
 - Further, the proposed Facility forwards the intent **Policy LU-1.6**: "Ensure adequate public facilities (including roads, emergency services, utilities,

¹ Per the National Center for Health Statistics, Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2022, Released December 2022

and school) exist to serve new development and mitigate potential impacts to current residents.” Telecommunication services are considered utilities. As more business is conducted on-line and more employees work remotely, reliable wireless service is imperative to the success of the business and efficient productivity. As the population of the City of Camas increases and land development patterns change over time, the demand for urban services also increases and changes. The proposed project is an ancillary use that will provide wireless service for residents and nearby development. The proposed project supports allowed development and urban growth by providing reliable communications services to a growing community where there is a current gap in coverage, doing so in a manner that encourages future collocation of an additional provider in an inconspicuous manner on the same tower to limit the future construction of additional towers. Additionally, AT&T will be improving a portion of the sidewalk that will be a benefit to the public use.

- The proposed project forwards the goal in **Section 3.4.2 Critical Areas NE-2**, “To preserve, maintain, and restore the City’s critical areas to protect their function and values.” The “Facility” is located within critical areas; specifically, geologically hazardous areas, frequently flooded areas, and adjacent to fish and wildlife habitat conservation areas. A wireless communication facility is a passive, unmanned use that will not provide noise, dust, traffic, light and glare, toxic fumes or stormwater runoff. The “Facility” is contained within a 20ft x 20ft lease area and will not impact the seasonal stream or wildlife habitat located adjacent to the parcel or surrounding area. Critical Area reports have been provided for the proposed project as demonstrated in the supporting documents to AT&T’s Type III land use review application. See **Attachment 11—Geological Hazard Report, Attachment 12—Floodplain Report, and Attachment 13—Critical Areas Habitat Assessment.**
- The proposed project forwards the intent of **Section 5.13 Franchise Utilities**, specifically **Goal F-1**: “To ensure that energy and communication facilities and their services are available to support development when they are needed.” Telecommunication facilities are an essential service, needed to serve the needs of the commercial and residential areas. People rely on the ability to use their phones and other wireless devices at home, both indoors and outdoors. Given most homes are wireless only, the WCF provides a high quality of life for the neighborhoods within the Targeted Service Area. This proposed facility is intended to provide coverage replacement and fill a significant gap in AT&T’s network coverage and service quality experienced by its customers in the “Target Area”. Specifically, the candidate will provide new dominant 4G & 5G LTE coverage and enhanced capacity in the area including schools, residences and businesses as well as along HWY 14. The enhanced coverage and capacity will also support public safety by improving emergency responses through improved connectivity for

making emergency calls and access to a more reliable 4G & 5G LTE network for first responders. See **Attachment 4—AT&T RF Justification**.

- Further, the proposed project forwards the intent of **Policy F-1**: “Minimize the effects on adjacent properties, the environment, and the visual quality of the community of siting, developing, operating, and maintaining these facilities.” The proposed “Facility” is a 60ft stealth bell tower designed to blend with the environment and appear to be a part of the existing church and not as a wireless communication facility which will minimize the visual impact on the surrounding residential properties. See **Attachment 19—Zoning Drawings**.
- Further, the proposed Facility also forwards the intent of **Chapter 6: Economic Development**, specifically **Policy ED-1.5**: “Ensure adequate infrastructure is planned or in place to nurture and incubate new businesses.” Telecommunication facilities support economic growth and development by addressing a public need – reliable wireless service. Wireless service infrastructure promotes economic development and quality of life where people live, work, and play. As more business is conducted on-line and more employees work remotely, reliable wireless service is imperative to the success of the business and efficient productivity, while expanding economic opportunities for all individuals.

6.2. Federal Law

Federal law, primarily found in the Telecommunications Act of 1996 (“Telecom Act”), acknowledges a local jurisdiction’s zoning authority over proposed wireless facilities but limits the exercise of that authority in several important ways.

6.2.01. Local jurisdictions may not materially limit or inhibit the provision of personal wireless services.

The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that “prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services.” 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission (“FCC”) Order adopted in September 2018,² a local jurisdiction’s action has the effect of prohibiting the provision of wireless services when it “materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.”³ Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating to new technologies, and/or maintaining high quality service.⁴

While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless

² *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, Declaratory Ruling and Third Report and Order*, 33 FCC Rcd 9088 (2018), ¶¶ 86-87, vacated in part, *City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), cert. denied, 594 U.S. ___, (June 28, 2021)(No. 20-1354) (“FCC Order”).

³ *Id.* at ¶ 35.

⁴ *Id.* at ¶¶ 34-42.

carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap.** Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City*, 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007), *affirmed in part*, 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco*, 2006 WL 1699580, *10-11 (N.D. Cal. 2006).
- **Least Intrusive Means.** The least intrusive means standard "requires that the provider 'show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

6.2.02. Environmental and health effects prohibited from consideration.

Also, under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). AT&T has included with this application a statement from its radio frequency engineers demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission's RF emissions regulations. (See **Attachment 6—AT&T RF Safety Compliance Statement**) Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed Facility should be disregarded in this proceeding.

6.2.03. No discrimination amongst providers.

Local jurisdictions may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers' applications for similarly situated facilities.

6.2.04. Shot Clock.

Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a "reasonable" period of time. 47 U.S.C. § 332(c)(7)(B)(ii). The FCC has issued a "Shot Clock" rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq.* A presumptively reasonable period of time for a local government to act on all relevant applications for a "macro" wireless facility on a new structure is 150 days. 47 C.F.R. § 1.6003(c)(1)(iv). The Shot Clock date is determined by counting forward 150 calendar days from the day after the date of submittal. 47 C.F.R. § 1.6003(e).

Pursuant to federal law, the reasonable time period for review of this application is 150 days.