

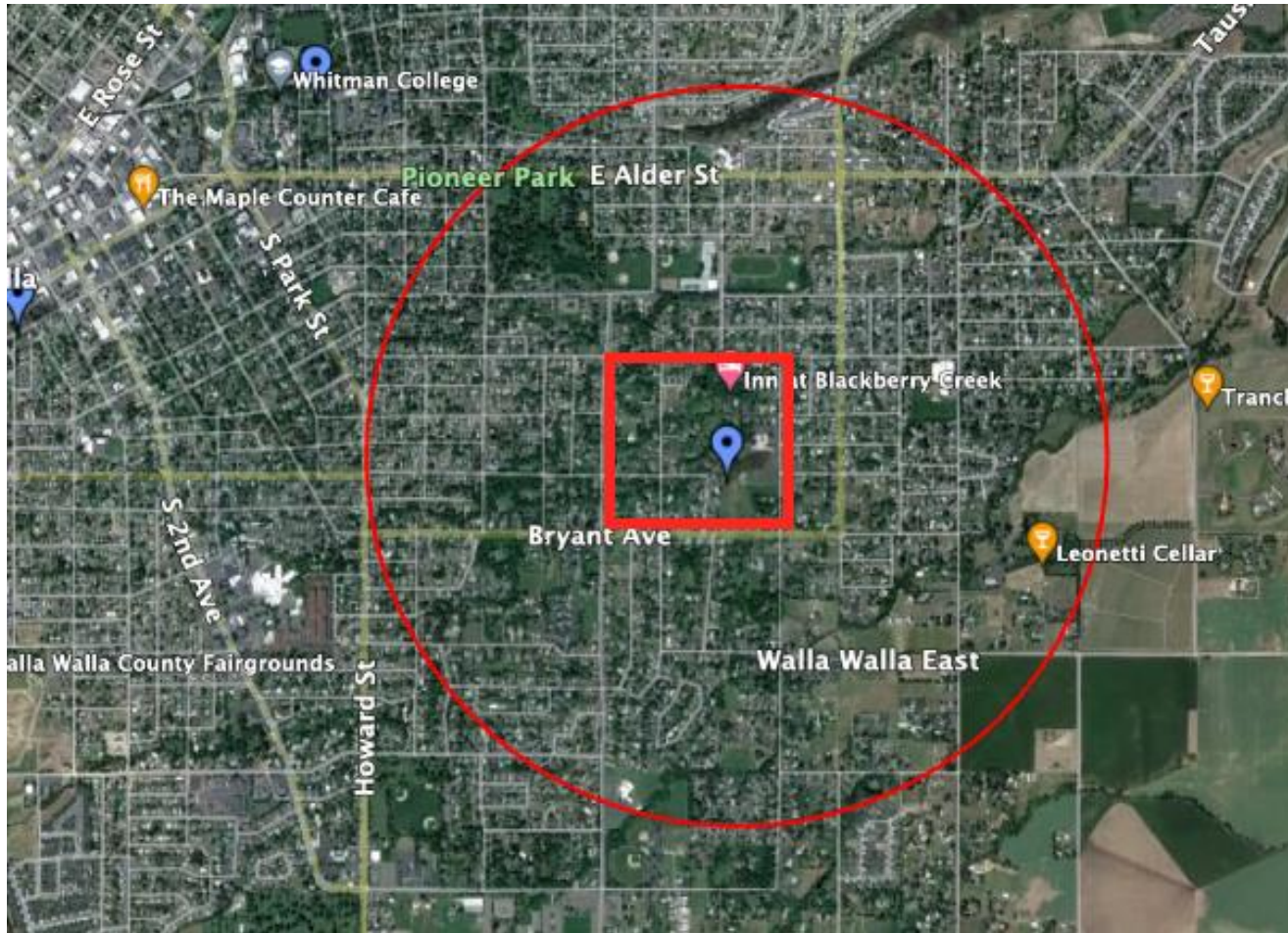
# Alternative Sites Analysis

AT&T WL4557 Walla Walla Mill Creek

928 Sturm Ave

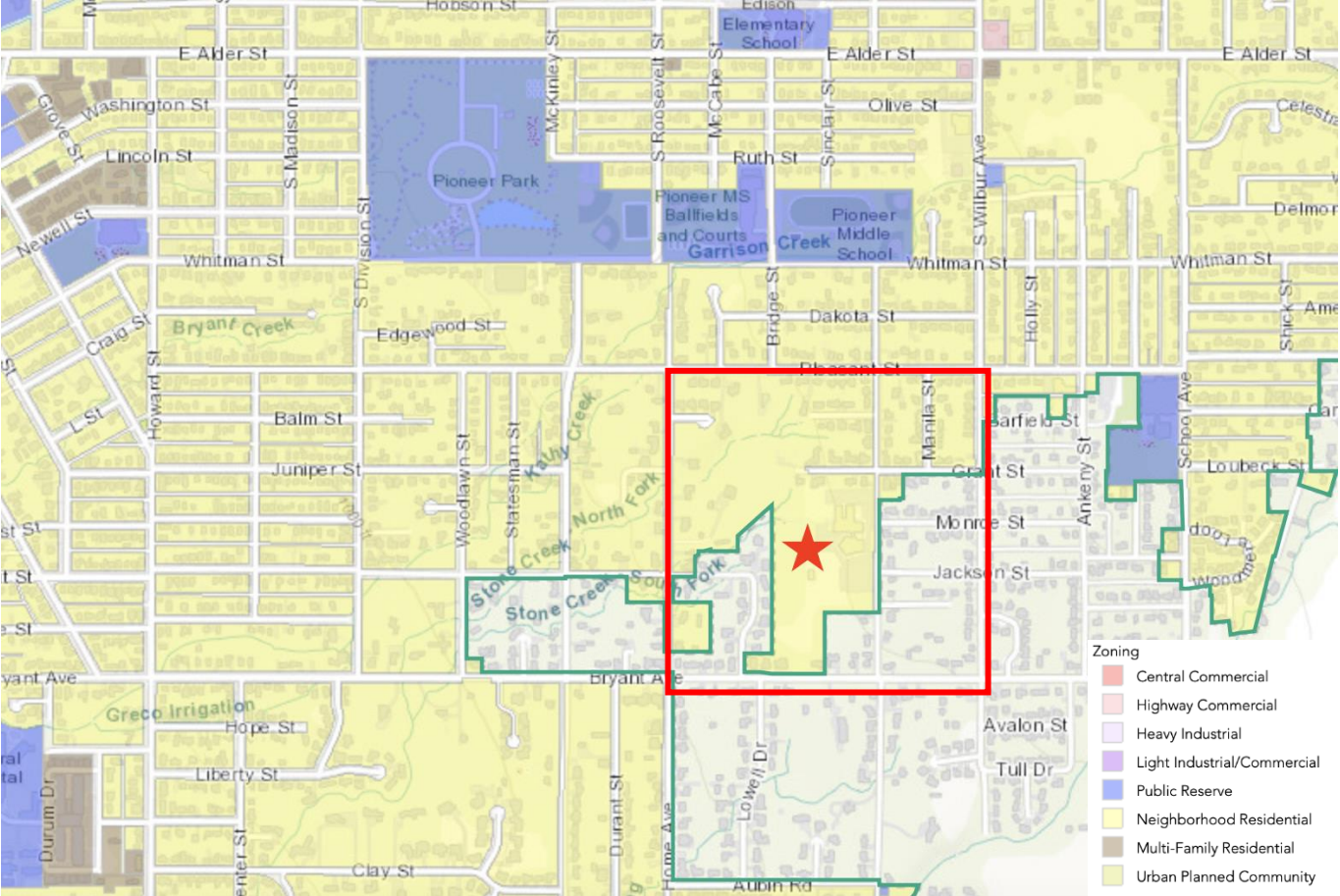
Updated July 2023

# Search Ring & Coverage Objectives



- The primary objective of the proposed new Facility is to fill a significant coverage gap in the City of Walla Walla. Currently, portions in and around Walla Walla East have minimal to no 4G voice service.
- The targeted service area is within the red circle. In order to fill the current gap in coverage within this area, AT&T needed to secure a location near the center of the Search Ring (search ring = red square). Please also see Attachment 15 – RF Justification.
- Moving the Facility toward the edges of the Targeted Service Area in any direction could cause interference with other existing AT&T sites and limit the improvement in services near the center of the circle where there currently exists a significant coverage gap.

# Zoning Considerations



- The area within the Search Ring is zoned exclusively residential, which is the lowest ranked preference for wireless communication facilities under the Walla Walla code.
- The commercial zoning districts outside of the search ring and to the west of the proposed location have existing AT&T facilities.
- In the PR zone, WCF can be attached to existing public facilities but there are limited existing facilities available.
- The area of the Search Ring in Walla Walla County is zoned urban residential, a zone in which WCF are not allowed.
- In residential zones, WCF are only allowed on non-residential use properties (i.e., churches), which limits the number of available properties on which to locate.
- Please see Siting Hierarchy Table on the following page for more details on the zoning considerations.



# Siting Hierarchy under WWMC 20.170.040(C)

Order of Preference for Siting a WCF	Available options for locating a WCF
<i>Existing or replacement antenna support structures and alternative antenna support structures</i>	There are no existing antenna support structures within ¼ mile of the proposed site given that the City of Walla Walla previously did not allow WCFs in residential zones. The closest existing WCF is over 1 mile to the south. This is not only too far to meet the coverage objectives, but also too close to an existing AT&T facility to the west. Additionally, there are no buildings/structures within the search area that can provide the 59ft in elevation needed to meet the coverage objectives.
<i>Structures or sites used exclusively for Industrial purposes</i>	The search ring is zoned residential and does not include any sites exclusively used for Industrial purposes either within the ring or nearby.
<i>Attached to existing public facilities such as water towers, utility structures, fire stations, bridges, and other public buildings within the CC, CH, IL/C, IH, and AD zoning districts not utilized primarily for recreational uses</i>	The Search Ring is zoned residential. Outside of the Search Ring but still within the service area, there are few properties zoned CC, CH, IL/C, IH, or AD. Of those, there are two (2) properties zoned CH (Commercial Highway) to the northwest of the Search Ring. However, those properties do not include public facilities on which to attach. And within the commercial and industrial zones to the west of the proposed location (again, outside of the Search Ring), there are already AT&T sites. As such, this facility cannot be moved into those zones on any existing public facilities as it would cause interference with the existing sites and leave the coverage gap in Walla Walla East.
<i>Structures or sites used exclusively for manufacturing, commercial, and office uses in the ZCC, CH, IH, and IL/C zones</i>	As described above, there are two (2) properties zoned CH approximately 0.5 mile to the northeast of the proposed location. These properties are currently used for commercial purposes. Please see Alternative Locations Table for more details on these locations.
<i>Attached to existing public facilities such as water towers, existing or replacement utility structures, fire stations, bridges, and other public buildings within public reserve zones</i>	There are multiple properties zoned PR near the search ring. These include: two (2) schools (the school district does not allow WCF) and two (2) city-owned parcels (that would require a new structure and thus not meet this preference).
<i>Facilities within the RN or RM zones, as allowed per 20.170</i>	The Search Ring is zoned Neighborhood Residential (RN), and per Section 20.170.50, WCFs are only allowed on "non-residential" use properties. This limits the available locations to site a WCF. Please see details on alternative locations on the following pages.

# Siting Factors Relevant under Case Law

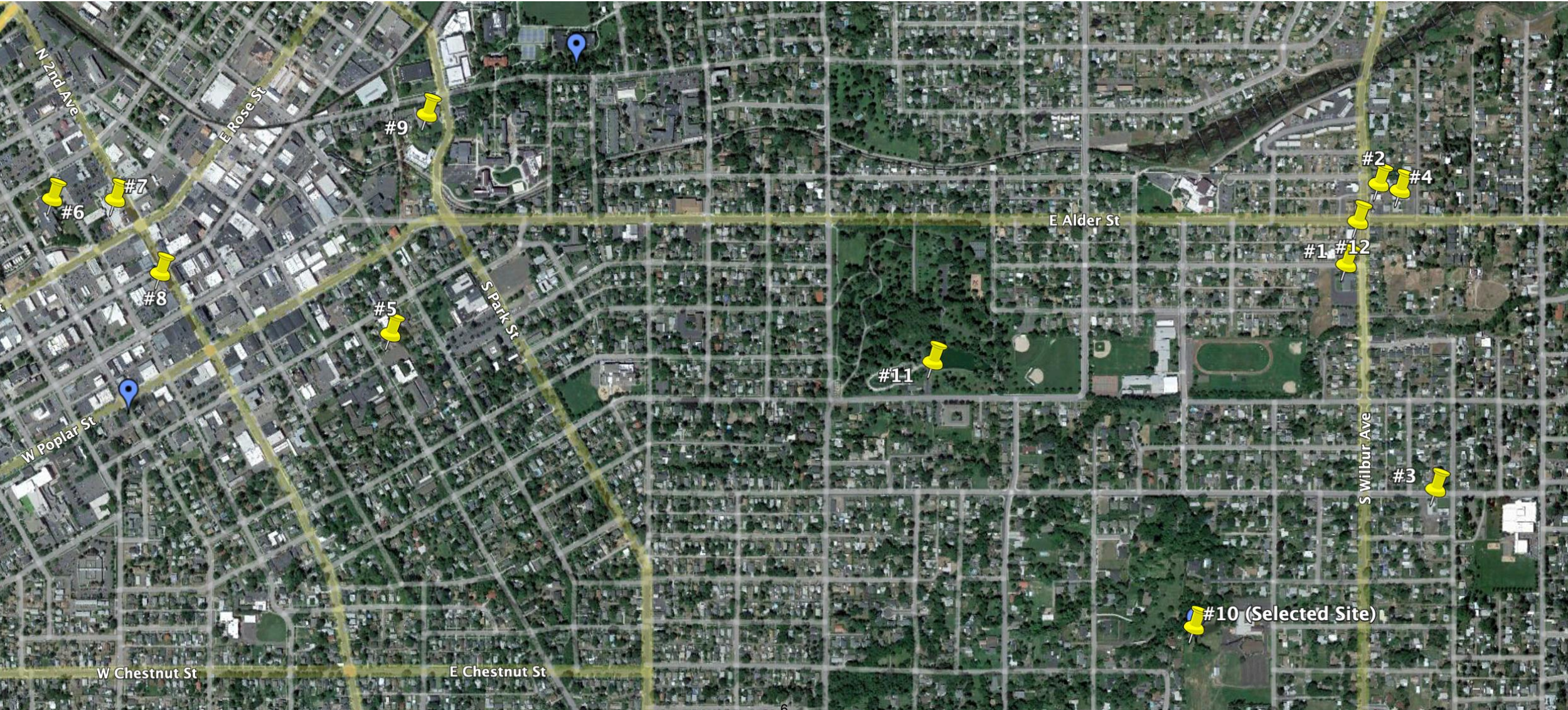
While AT&T need not demonstrate that its proposal is the “least intrusive means” under the WWMC, its team generally follows the standard developed under federal case law to evaluate whether an alternative site is feasible. See *T-Mobile W. Corp. v. City of Huntington Beach*, No. CV 10-2835 CAS EX, 2012 WL 4867775 (C.D. Cal. Oct. 10, 2012).

Relevant to determining whether an alternative is feasible are the following factors:

<b><i>Must be leasable</i></b>	<b><i>“[T]he property owner must be willing to lease space for the” proposed facility.</i></b>
<b><i>Must be technically feasible</i></b>	<b><i>A WCF at the location must address the carrier’s gap in coverage and meet the service objective.</i></b>
<b><i>Must be zoneable</i></b>	<b><i>The site “must be zoned to allow for wireless telecommunications facilities, at the height necessary to provide coverage.”</i></b>
<b><i>Must be buildable</i></b>	<b><i>The site “must have access to utilities, it must be capable of supporting the antennas, and there must be enough space to place the antennas and other equipment.”</i></b>



**Alternative Site Locations:** As stated previously, a search ring is provided by the RF engineers that build the AT&T network. We reviewed their request and compared it to existing zoning, development requirements, land uses, existing conditions, etc. After this review, we identified 12 properties as potential sites--#12 fell out due to the site/zoning regulations constraints. The map below shows each of these locations with a yellow pin (blue pins represent existing AT&T facilities):





# Contact with Area Property Owners

- After identifying the properties in the previous slide (aerial view), on March 13, 2020, J5 sent letters to 11 property owners, as listed below, directed to the owner and mailing address listed in the County Assessor's records and inquiring about potential interest in leasing a site to AT&T.

Site Number	Site Name	Site Address	Mailing Address	Lat/Long	Owner	Notes
WL4557	WALLA WALLA MILL CREEK	364 S Park Walla Walla, WA 99362	364 S Park Walla Walla, WA 99362	46.064547 -118.307736	Walla Walla School District #140	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	342 S Wilbur Ave Walla Walla, WA 99362	342 S Wilbur Ave Walla Walla, WA 99362	46.06631 -118.305034	Bethel Assembly	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	1603 E Alder St	3200 Hackberry Rd Irving TX 75063	46.068120 -118.304034	7-11 Store	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	1500 Pleasant St	PO BOX 13650 Des Moines, WA 98198	46.061898 -118.302859	Grace United Methodist Church	4/13: Tom with Steplecom is getting info from the Church
WL4557	WALLA WALLA MILL CREEK	1625 E Alder St Walla Walla, WA 99362	1625 E Alder St Walla Walla, WA 99362	46.068018 -118.303254	United Pentecostal Church	4/1: Jerry Linn (509-240-2768) and Jeff Hall (Pastor), 1 acre of land that is available
WL4557	WALLA WALLA MILL CREEK	323 Catherine St Walla Walla, WA 99362	323 Catherine St Walla Walla, WA 99362	46.065149 -118.332702	St Pauls Parish Church	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	201 N 3rd Ave Walla Walla, WA 99362	201 N 3rd Ave Walla Walla, WA 99362	46.067648 -118.342749	Army Corps of Engineers	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	6 W Rose St Walla Walla, WA 99362	6 W Rose St Walla Walla, WA 99362	46.067636 -118.340659	Walla Walla Whitman Towers	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	7 W Main St Walla Walla, WA 99362	7 W Main St Walla Walla, WA 99362	46.066302 -118.339582	Baker Boyer Bank	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	280 Boyer Ave Walla Walla, WA 99362	280 Boyer Ave Walla Walla, WA 99362	46.069513 -118.331793	ASWC Radio Committee	3/13: Sent a letter to the owner
WL4557	WALLA WALLA MILL CREEK	928 Sturm Walla Walla, WA 99362	928 Sturm Walla Walla, WA 99362	46.059455 -118.307836	Blue Mountain Community Church	Chosen Candidate

- Only the owners/representatives of the church-owned parcels (three parcels) responded, in the form of a telephone call to J5. See notes from April 2020 immediately above.
- Even if there is interest, further review and evaluation is done to determine if the property will be feasible. More research is done with the jurisdiction for development standards and process. A construction team evaluates the suitability of the site and additional studies are ordered. RF engineers determine (based on zoning) what height will work and how the facility will communicate within the network. A site may not pass after this further review even though it seems like a likely candidate and the property owner has shown initial interest. See details in the next two slides.

# ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
1	342 S. Wilbur Street	Walla Walla Assembly (Church) RN Zone Raw Land	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new stealth facility but did not respond.</li> </ul>
2	1603 E. Alder Street	7-11 HC Zone Raw Land	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new stealth facility but did not respond.</li> <li>Although this is a higher-ranked location, it is still adjacent to residential properties.</li> </ul>
3	1520 Pleasant Street	United Methodist Church RN Zone Raw Land	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new stealth facility and responded.</li> <li>This property is zoned RN just like the proposed location, so it has no preference under the WWMC.</li> <li>This property is much smaller than the Subject Property chosen for the new facility. There are limited locations where a facility could be placed to meet the required 65' setbacks.</li> <li>Those locations on the property where the 65' setbacks can be met do not have existing vegetation to provide the natural screening that the subject parcel provides.</li> <li>AT&amp;T's RF engineers noted that from this site, the coverage improvement would stop at Fern Ave and would not go any further to the west (planned coverage would go west to Howard Street).</li> </ul>
4	1625 E. Alder Street	Church RN zone Raw Land	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new stealth facility and responded.</li> <li>This property is zoned RN just like the proposed location, so it has no preference under the WWMC.</li> <li>It is northeast of the search ring, but within the Targeted Service Area. As such, it would help fill the coverage gap but could limit the service improvements in the southwestern portion of the Targeted Service Area (spotty coverage near Bryant Ave and Fern Ave).</li> <li>The size of the parcel would make it difficult to locate a WCF that meets setbacks without impacting the current use of the property.</li> <li>The church is surrounded by residential properties and does not include the vegetation and trees that the subject property has that help screen and blend the monopine with its surroundings.</li> </ul>
5	323 Catherine Street	St. Paul's Episcopal Church RM Zone Raw Lane	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new stealth facility but did not respond.</li> <li>Additionally, this property is outside of the search ring and close to an existing AT&amp;T facility. As such, it would not adequately meet the coverage objectives.</li> </ul>
6	201 N. 3 <sup>rd</sup> Street	U.S. Army Corps of Engineers PR Zone Building	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new facility but did not respond.</li> <li>Additionally, this property is outside of the search ring and close to an existing AT&amp;T facility. As such, it would not adequately meet the coverage objectives.</li> </ul>



## ALTERNATIVE SITE LOCATIONS

Site Location		Site Description	Summary
7	6 W. Rose Street	Marcus Whitman Hotel CC Zone Building	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new facility but did not respond.</li> <li>Additionally, this property is outside of the search ring and close to an existing AT&amp;T facility. As such, it would not adequately meet the coverage objectives.</li> </ul>
8	7 W. Main Street	Bank CC Zone Building	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for a new facility but did not respond.</li> <li>Additionally, this property is outside of the search ring and close to an existing AT&amp;T facility. As such, it would not adequately meet the coverage objectives.</li> </ul>
9	280 Boyer Avenue	Reid Campus Center PR Zone Existing Radio Tower	<ul style="list-style-type: none"> <li>This property was contacted as a potential location for collocation but did not respond.</li> <li>Additionally, this property is outside of the search ring and close to an existing AT&amp;T facility. As such, it would not adequately meet the coverage objectives.</li> </ul>
10	928 Sturm Avenue	Blue Mountain Community Church RN Zone Raw Land	<ul style="list-style-type: none"> <li>This is the subject property chosen to locate a new wireless communication facility.</li> <li>It is in the center of the search ring and will meet both coverage and capacity in all directions.</li> <li>The property consists of multiple large parcels with mature existing trees and vegetation that provide natural screening to the proposed facility.</li> <li>The location will not impact the current use of the property.</li> </ul>
11	940 E Alder St	Pioneer Park PR Zone Raw Land	<ul style="list-style-type: none"> <li>There are not existing public facilities on which to collocate that would provide the minimum height to meet the coverage objectives.</li> <li>The park is north of the search ring and would limit coverage and capacity improvements to the south.</li> </ul>
12	1580 E Alder St	Franz Bakery Outlet HC Zone Raw Land	<ul style="list-style-type: none"> <li>Although this is a higher-ranked location, it is still adjacent to residential properties.</li> <li>Additionally, the property is too small to locate a new WCF and meet required setbacks, and the existing building is too short.</li> </ul>

## ALTERNATIVE SITE LOCATIONS – SUGGESTED IN PUBLIC COMMENTS

Site Location		Site Description	Summary
A	2301 Russell Creek Road	Proposed DISH tower in Walla Walla County Exclusive Agriculture 120-acres Collocation	<ul style="list-style-type: none"> <li>• A 100-foot tower proposed by DISH was conditionally approved by Walla Walla County in File No. CUP22-010, CAP22-014.</li> <li>• This proposed tower is outside of AT&amp;T’s targeted service area. See RF Justification, Figure E.</li> <li>• This proposed tower is not yet “existing” because it has not yet been built. The availability of a collocation opportunity is currently speculative.</li> <li>• Even if collocation were available in the future, this suggested alternative fails to fill AT&amp;T’s coverage gap. See significant area lacking coverage in Figure E of the RF Justification, assuming an 85ft antenna tip height.</li> </ul>