

**APPROVED**

**CITY OF EDMONDS  
ARCHITECTURAL DESIGN BOARD  
*Minutes of Regular Meeting***

**February 16, 2011**

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Chair Kendall called the meeting of the Architectural Design Board to order at 7:00 p.m., at the City Council Chambers, 250 - 5<sup>th</sup> Avenue North, Edmonds, Washington.

**Board Members Present**

Valerie Kendall, Chair  
Rick Schaefer, Vice Chair  
Lois Broadway  
Bryan Gootee  
Michael Mestres

**Board Members Absent**

Bruce O'Neill  
Tom Walker (excused)

**Staff Present**

Mike Clugston, Planner  
Karin Noyes, Recorder

**APPROVAL OF MINUTES**

**VICE CHAIR SCHAEFER MOVED THAT THE MINUTES OF FEBRUARY 2, 2011 BE APPROVED AS SUBMITTED. BOARD MEMBER GOOTEE SECONDED THE MOTION. THE MOTION CARRIED UNANIMOUSLY.**

**APPROVAL OF AGENDA**

No changes were made to the agenda.

**REQUESTS FROM THE AUDIENCE:**

There was no one in the audience.

**CONSENT AGENDA:**

There were no items on the consent agenda.

**MINOR PROJECTS:**

No minor projects were scheduled on the agenda.

**PUBLIC HEARINGS - MAJOR PROJECTS:**

No public hearings were scheduled on the agenda.

**CONSOLIDATED PERMIT APPLICATIONS (No Public Participation):**

No consolidated permit applications were scheduled on the agenda.

## ADMINISTRATIVE REPORTS/ITEMS FOR DISCUSSION:

### Review of Design Standards Proposed in Wireless Communication Facility Regulation Update

Mr. Clugston explained that, at the request of the City Council, the Planning Board has been working for the past year to update the City's Wireless Communication Facility (WCF) Regulations, which are currently located in Edmonds Community Development Code (ECDC) 20.50 and 18.05.030. The goal is to update the regulations to reflect how WCFs are located today, to combine the code into one chapter, and to make sure it is in agreement with federal requirements for such facilities.

Mr. Clugston advised that the Planning Board has proposed a wide range of development standards that are meant to ensure that WCFs blend in as much as possible with the environments where they are located. He explained that the Planning Board is seeking feedback from the Architectural Design Board (ADB) about whether additional changes are needed or if the standards need to be clarified. They would like the ADB to specifically comment on Chapters 20.50.050, 20.50.090, 20.50.100 and 20.50.110, all of which are related to design standards for WCFs. He noted that the current WCF regulations were adopted in 1996, and technology and Federal Communication Commission (FCC) requirements have changed over time. The community's expectations related to WCFs have also changed.

Mr. Clugston referred to the proposed language and explained that the Planning Board's intent was to discourage large monopoles, which are aesthetically displeasing and clutter the landscape. Instead, providers are encouraged to locate WCFs on existing tall buildings and/or structures or to retrofit existing utility poles. The goal is to minimize the footprint of future WCFs and require them to be as unobtrusive as possible, recognizing that the FCC does not allow the City to prohibit the facilities.

Mr. Clugston reported that the Planning Board conducted an individual driving tour throughout Edmonds to identify several different types of existing facilities. He provided pictures to illustrate the pros and cons of the various types of WCFs located within the City:

- **Monopoles.** Monopoles are large and tall. The City wants to encourage providers to co-locate on existing monopoles rather than erecting new ones. Monopoles are almost always made of metal, and there is often a large facility at the base of the poles for ground equipment. The City prefers that the equipment be placed underground; but if that is not possible, they want it to be screened with fencing or landscaping. Some monopoles are shrouded so they blend in more with the environment. While this is an improvement, they are still very tall structures. The goal of the proposed language is to create a permit process that has adequate design review to minimize the impact of monopoles in the future. Based on current code, a monopole can have a fairly bad design and still be code compliant.
- **Utility pole retrofits.** Many times, old wooden utility poles are replaced with metal poles with antennas attached to the top. Residents in the Sea View Neighborhood expressed particular concern because the replacement pole installed in their area was much larger and made of metal, which did not blend in with the existing poles in the neighborhood. They would have preferred the pole to be replaced with a wooden variety, but they recognized it would need to be taller to provide space for the WCF on top. The City's design standards were changed as a result of this situation.
- **Building mounted antennas.** In some cases, antennas are placed on the roof of existing structures. When placed near the edge of the building they are highly visible from the street. The City would prefer the antennas to be placed towards the middle of the building so they cannot be seen by pedestrians at the street level. Another option is to mount them on the side of existing buildings or behind or on top of a parapet. For example, numerous antennas have been mounted to the elevator shaft of the hospital. They have been painted to match the building and are nearly invisible from the street level. Antennas can also be located on the side of a chimney and painted to blend in. The antennas located on top of the performing arts center cannot be seen from the street

because they have been built into the side of the structure and screened with radio frequency (RF) transparent materials.

Kendall asked if the City has the ability to require providers to allow others to co-locate on their existing facilities. Mr. Clugston explained that providers seek to site WCFs where there are existing coverage gaps. Typically, they look for opportunities to co-locate their facilities on existing structures. However, the owner of the existing structure must be willing to lease space in order for the co-location to move forward. While the City cannot compel a provider to allow co-location, they can encourage it. Co-location is encouraged in the existing code language, and the proposed new language would be even more forceful in this regard.

Mr. Clugston explained that the proposed code language is completely new and is an amalgamation of regulations from various local communities and current FCC requirements. The main idea is to provide better design standards for how the facilities will look and to encourage co-location on existing structures whenever possible.

Board Member Mestres asked if the Board would be responsible for reviewing the technical aspects of a proposed WCF or if their review would be solely related to aesthetics. He noted that the Board does not have the expertise to make decisions about whether a particular type of facility is appropriate and necessary in the proposed location. Mr. Clugston agreed that there are certain technical requirements for the various types of WCFs. For example, a monopole must be strong enough to withstand wind, which requires that they be constructed of metal in most cases. He noted that both lattice and guy wire towers would be prohibited based on the proposed code language. He summarized that the intent is to provide clear design standards so that providers can immediately identify what the City wants to see and what they will allow. Hopefully, the updated standards will be easier for the industry to use and understand. He summarized that the ADB would not be asked to make a decision about whether or not a proposed WCF is the right technology. Their role would be review the aesthetic aspect of a proposal. He noted that technology is changing rapidly, and the goal is to provide adequate design criteria to guide the siting of future facilities.

The Board reviewed the proposed design standards and provided the following feedback:

- **ECDC 20.50.050.F – Finish.** Vice Chair Schaefer expressed concern about the use of a galvanized steel finish. He suggested that a metal structure that is painted a neutral color might be more appropriate. Board Member Broadway pointed out that the Environmental Protection Agency (EPA) has issued a report that galvanized materials leach into the soil, which can create an environmental concern. However, she acknowledged that prohibiting galvanized monopoles would not solve the problem since most traffic light poles are also constructed of galvanized steel. Board Member Gootee expressed concern that painted poles become unsightly if they are not adequately maintained. On the other hand, galvanized poles would be maintenance free and would blend in with the Northwest Environment. Board Member Mestres said he would support requiring metal poles that are painted to match the environment, and Chair Kendall suggested the code could be flexible to allow whichever material is most appropriate for a specific location. Board Member Broadway agreed that either galvanized steel or painted metal would be appropriate materials, depending on the location of the proposed WCF. Mr. Clugston pointed out that the proposed language would allow either material.
- **ECDC 20.50.050.G – Design.** Board Member Broadway suggested that providers be required to use graffiti and vandalism proof materials, particularly the ground equipment enclosures. Board Member Gootee pointed out that vandalism resistant materials are costly. In his experience, they allow graffiti to be washed off the first time, but then they must be reapplied. Therefore, it is more cost effective to simply paint over the graffiti. Board Member Mestres recalled that the City Council recently passed an ordinance that requires property owners to deal with graffiti on their property within a one-month time period. Vice Chair Schaefer suggested that graffiti and vandalism can be addressed as an enforcement issue, but they should make sure the new law applies to WCF's, as well. Mr. Clugston agreed to include addition language in the maintenance section to address this issue.

Board Member Gootee questioned what the Board's role in design review of WCF proposals would be. Would they be responsible for making sure a facility blends in with its environment and that it is properly screened? He also questioned what criteria the Board would use to determine whether or not a proposed facility would "blend in." Mr. Clugston answered the Board's role would depend on the type of permit. Co-locations such as antennas on the water tank would be a staff review. Proposals that require SEPA review would also be reviewed by the ADB. He further advised that the term "blend in" is meant to be a general term rather than a specific standard. The Planning Board felt it would be appropriate to allow flexibility depending on the site circumstances.

Board Member Mestres said that before an application comes before the ADB for design review, he hopes staff would already have discussed the technical requirements with the applicant. The Board needs to have a clear understanding about why specific elements of the project are being proposed and how much leeway they have to require design changes without compromising the function of the facility.

- **ECDC 20.50.050.H – Color.** The Board agreed that WCFs should be painted a neutral color to blend in with the surrounding environment.
- **ECDC 20.50.050.I – Lighting.** Mr. Clugston pointed out that lighting should not be a problem in Edmonds because the FCC does not require providers to light a WCF unless it exceeds 200 feet in height.
- **ECDC 20.50.050.M – Landscaping and Screening.** Board Member Broadway expressed concern that the proposed language does not provide a lot of direction as to how the ground equipment enclosures should be screened. Mr. Clugston pointed out that ground equipment enclosures are addressed more substantially in other sections of the code.

Vice Chair Schaefer questioned how the proposed landscaping would be measured to ensure it meets the requirements of ECDC 20.13. Board Member Gootee suggested that the same landscaping and screening requirements that apply to trash enclosures would also apply to equipment enclosures that are located on the ground. Mr. Clugston agreed and pointed out that, as proposed, chain link, plastic and wire fencing would be prohibited. Ornamental metal and wood fencing would be the preferred materials for screening equipment enclosures. He said the proposed language indicates that locating equipment enclosures underground would be the preferred option. If this is not possible, the enclosures must be screened or located within an accessory structure that meets the setback requirements. The Board pointed out that in order to make the requirement clear, the word "or" in the last sentence of ECDC 20.50.090.C should be changed to "and."

The Board discussed whether or not there should be a height limit established for equipment enclosures located on the ground. Mr. Clugston pointed out that the equipment enclosures would be considered accessory structures, which are limited to a maximum height of 15 feet, and they must meet all setback requirements. Board Member Broadway asked if any additional landscaping would be required around the accessory structures, and Mr. Clugston answered affirmatively.

- **ECDC 20.50.090 – Building-Mounted Wireless Communication Facilities.** Mr. Clugston explained that, as per the proposed language, WCFs in the downtown area would be limited to the maximum building height allowed in the zone. Rather than placing antennas on the edge of an existing building, the new code language would require the antennas to be placed towards the center of the roof. They would be allowed to extend up to the maximum height allowed in the zone. Board Member Broadway pointed out that the code allows exceptions to the height limit for steeples, flag poles, etc. She asked if the proposed language would allow a provider to attach an antenna to an existing steeple or other structure that has been allowed to exceed the height limit. Mr. Clugston pointed out that there are very few exceptions to the height limit in the downtown zones. He said the Planning Board discussed the idea of allowing additional height in the downtown zone for antennas

that are placed on rooftops, but they decided not to go that route. He pointed out that flag poles are considered accessory structures and cannot exceed 15 feet in height. He said that while there is an exception in the BD zones that allows additional height for elevator shafts, chimneys and vent pipes, the Planning Board is not recommending a height exception for antennas. They are, however, recommending an additional height allowance of 9 feet for rooftop antennas in other zones throughout the City.

Vice Chair Schaefer pointed out that ECDC 20.50.100.A.1 states that co-location of antennas on permitted nonconforming monopoles is not considered to increase the nonconformity of the structure and is therefore permitted. He asked if antennas would be allowed on top of nonconforming buildings that already exceed the maximum height limit. Mr. Clugston answered that anything above the maximum height limit would be considered nonconforming. WCFs that are currently located on top of nonconforming buildings could be maintained and/or replaced, but no new facilities would be allowed.

The Board agreed that it would not be impractical or unnecessarily burdensome to require providers to screen WCFs that are located on existing buildings. They cited the Performing Arts Center as a good example of facilities located unobtrusively on an existing building.

Board Member Mestres pointed out that if the code does not allow antennas to extend beyond the maximum height limit in the downtown zones, more antennas may be required in order to obtain maximum coverage. Mr. Clugston acknowledged that may be the case.

- **ECDC 20.50.100 – Structure-Mounted Wireless Communication Facilities.** Mr. Clugston pointed out that retrofitting existing utility poles to provide space for WCFs is a good option for providing coverage in residential zones, particularly if the poles are wooden to match the other wooden utility poles. He noted that this type of installation does require that the pole be extended approximately 20 feet.

**ECDC 20.50.110 – Monopole Standards.** Board Member Gootee asked if the City could require a provider to camouflage an entire monopole. Mr. Clugston answered that placing a shroud around the entire monopole is a less costly option, but it requires additional height, which is something they don't want to see in the downtown. The Planning Board has indicated they would prefer antennas to be located on existing buildings whenever possible and then painted to blend in. Board Member Broadway expressed concern that requiring a monopole to be shrouded to screen the antennas may end up calling more attention to the pole. Mr. Clugston pointed out that the proposed language would prohibit monopoles from being located in single-family zones, multi-family zones, BD zones, public open space, parks and City rights-of-way. That means they are limited to commercial zones.

Vice Chair Schaefer questioned the use of the terms “adverse impacts” and “negative impacts.” He noted that the word “adverse” has a certain standing in the State Environmental Policy Act (SEPA), and staff should check to make sure the terms are used accurately and consistently throughout the proposed language.

Vice Chair Schaefer also pointed out a possible inconsistency between ECDC 20.50.010.A.4 and ECDC 20.50.010.A.8. Item 4 states that WCFs would be allowed in residential areas only when necessary to meet the functional requirements of the industry. However Item 8 states that they can be located on City properties. He noted that the water tank is City property, and it is located within a residential area.

Vice Chair Schaefer advised that the proposed new language would not apply to television antennas that are placed on single-family homes. Mr. Clugston agreed and added that ham radio antennas would also be exempt from the proposed language. Both of these uses are dealt with elsewhere in the code.

Vice Chair Kendall asked if any of the existing WCFs in the City would comply with the proposed new code language. Mr. Clugston answered that some would comply. He expressed his belief that providers would not have difficulty complying with the proposed requirements.

**ARCHITECTURAL DESIGN BOARD MEMBER COMMENTS:**

**Election of 2011 Officers**

Vice Chair Schaefer indicated he would be willing to continue to serve as Vice Chair. Chair Kendall noted that she has served as Chair for a number of years, and she questioned if another Board Member would like to have an opportunity. The Board agreed to table this discussion until the next meeting to include the absent Board Members in the decision.

**ADJOURNMENT:**

The meeting was adjourned at 8:30 p.m.