
PUD No. 1
Advanced Metering Infrastructure System
Project Narrative for Conditional Use Permit

Prepared by David Evans and Associates, Inc.

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APPLICANT:

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PROJECT AND SITE DESCRIPTION

Property: Parcel No. 27041700202200

Legal Description: SEC 17 TWP 27 RGE 04RT 14B) BEG NE COR SE1/4 SW1/4 NW1/4 TH N87* 58 05W 142.34FT ALG N LN SD SUB TO SELY R/W LN CO RD TH SWLY ALG SD CO RD R/W LN 53.13FT TO TPB TH CONT SWLY ALG SD R/W LN 215.07FT TO PT 25FT W OF W LNOF 73RD ST W PROD SLY TH S00*33 00W 100FT TH S87*58 05E 200FT TH N00*33 00 E 174.62FT TO TPB

Project Description:

Public Utility District No. 1 of Snohomish County (SNOPUD) is proposing to install an Advanced Metering Infrastructure (AMI) system for more efficient management of the Applicant's utility meters. The AMI system is an integrated system of smart meters, communications networks, and data management systems that enable two-way communication between utilities and customers. The AMI system is part of PUD's electric and water utility infrastructure upgrades and will provide more efficient management of the PUD's meters. When completed, the AMI system will provide advanced leak detection, real-time data, and enhanced data for utility use efficiency. The project will involve installing a 70' ductile iron utility pole approximately 61 feet above grade (9' direct bury) and to affix an omnidirectional antenna and Sensus M400B2 Base Station (22"H x 22"W x 11"D) data collector for the AMI system. The base station will be installed on the pole at a height of approximately 16 feet from grade. Overhead power and fiber optic lines from the existing substation will connect the AMI system.

The new infrastructure is planned at the PUD’s existing .59-acre existing substation site, located at 7230 Olympic View Dr, which is in the Public (P-1) zone. The project location is shown on the attached **Vicinity Map**. The addition of a wireless antenna and base station on a ductile iron pole (located outside of right-of-way (ROW)), is a conditional use. As such, a Conditional Use Permit (CUP) from the City’s Development and Business Services Department will be required.

The existing site contains the PUD’s existing utility facilities including a transformer and switchgear building. The current site is screened from Olympic View drive by landscaping. The entire site is fenced with a chain link security fence. The entire site is used to support electrical service and will continue to be used for that purpose.

Refer to the attached **Site Plan. Site Photographs** are provided at the end of this narrative.

The existing site is accessed regularly by the PUD’s staff for maintenance and operations activities. The addition of the AMI pole and antenna will have very little impact on the site. Once installed, twice yearly maintenance is anticipated, with rare occasions of troubleshooting if communications are lost. Overall impacts to operations on the site will be very minimal.

This project does not meet the SEPA environmental review thresholds as described in LMC 17.02.230B and WAC 197-11-800(23) and is therefore exempt. A Building Permit is not anticipated as the proposed project for metering of the PUD’s utilities and is exempt from building permits per **2018 IBC 105.2.2 Public Service Agencies** – *A permit shall not be required for the installation, alteration or repair of generation, transmission, distribution or metering or other related equipment that is under the ownership and control of public service agencies by established right.*

ZONING:	P-1 - Public	COMPREHENSIVE PLAN:	PRO - Parks, Recreation, and Open Space
EXISTING SITE USE:	The site currently has existing PUD facilities on the site	SITE AREA:	±0.59 acres

NEIGHBORHOOD CHARACTERISTICS:		ZONING	USES
	North	NA	City of Edmonds
	East	P-1 – Public & RS-8	Lynndale Park & Single Family Residential
	South	P-1 - Public	Lynndale Park
	West	P-1 - Public	Lynndale Park

Project Statistics:

Site Area	0.59 acres
Building Coverage	No buildings proposed
Impervious Surface	No additional impervious surfaces proposed

Parking	No additional parking proposed
Ground Disturbance	Approximately 10 square feet soil disturbance for pole installation (direct bury of 9' deep)

CUP NARRATIVE

In accordance with the Lynnwood Municipal Code (LMC), the following narrative describes how the proposed project complies with the decision criteria listed for conditional uses.

Compliance with Conditional Use Decision Criteria (LMC 21.24.100)

(A) The use for which such a permit is sought will not be injurious to the neighborhood or otherwise detrimental to the public welfare; and

The proposal will not be injurious to the neighborhood or detrimental to the public welfare. The site is already developed for use by the electrical utility and contains transformers and switchgear building. The proposed ductile iron pole will have a very small footprint and will be well-screened from view due the presence of terrain and existing trees along the perimeter. No additional noise will be generated by the completed project. The proposal will not result in an increase in site access or traffic. Therefore, no impacts to the public welfare are anticipated.

(B) It will be in harmony with the general purpose of this title.

Title 21 LMC (the zoning code) “provides regulations concerning the use of land and structures and the location, size, and bulk of structures for the purpose of avoiding or abating public nuisances” (LMC 21.04.015). The proposed project will take place within the P-1 zone, which is “intended to provide for nonresidential uses of a public or quasi-public nature to be located in or near residential areas and to establish standards which will minimize the impact of the nonresidential use on nearby properties” (LMC 21.44.050). Since electrical systems support the public good, and the AMI system will support the electrical system, the proposed use is in harmony with the purpose of the P-1 zone.

CONSISTENCY WITH DEVELOPMENT STANDARDS

With this CUP application, the PUD is requesting approval to install a 70-foot (61-feet above grade) ductile iron utility pole (9' direct bury) for the purposes of affixing the AMI antenna and base station data collector. The pole will be installed on the PUD's property. Location of the AMI infrastructure on the PUD's substation property in the Public Zone requires a Conditional Use Permit and according to City research and interpretation, no approved CUP exists for the site as it was likely completed or approved prior to annexation or prior to City requirement for a CUP, therefore a CUP is required for this project.

LMC 21.44.200 (Public Zone) indicates that all uses permitted in the RS-8 zone shall be subject to RS-8 regulations.

Table 21.42.100 LMC (Residential Single-Family Zones) specifies uses allowed in the RS-8 zone as a conditional use include public utility facilities necessary for the transmission, distribution or collection of electric, telephone, wireless communication, telegraph, cable TV, natural gas,

water, and sewer utility services, excluding sewer treatment plants, offices, repair shops, warehouses, and storage yards. The use table references LMC 21.42.110 (Limitations on Uses) with additional development standards. The following analysis describes compliance with each of the development standards for Public Utility Facilities in the RS-8 zone (LMC 21.42.110.B):

1. Such facilities shall not be injurious to the neighborhood or otherwise detrimental to the public welfare;

Response: The proposed facility is not injurious to the neighborhood or otherwise to the public welfare. The existing site is heavily screened and the AMI system is not anticipated to generate additional traffic aside from a handful of annual trips for inspections and maintenance.

2. The applicant shall demonstrate the need for the proposed public utility facility to be located in a residential area, the procedures involved in the site selection and an evaluation of alternative sites and existing facilities on which the proposed facility could be located or co-located;

Response: The public utility facility is located in the P-1 zone, not a residential zone. The AMI system is proposed to be co-located on a site that is already being utilized for public utility infrastructure.

An alternative should not be applicable as the subject property is zoned P-1 and is proposing co-locating on an existing PUD owned utility facility site.

We considered several alternate sites but in siting the proposed AMI utility pole we contemplate a variety of factors., For example we reviewed terrain, views from adjacent properties, existing trees/foilage nearby, and for the location of single-family residences so as not to place in ROW in front of a house.

Additionally, the proposal is to install an AMI system (omnidirectional antenna and Base station) on the proposed utility pole to provide management efficiency of PUD's meters. This is accomplished through two-way communications that have specific locational requirements that cannot be achieved on alternative sites. The specific location of the proposed utility pole and antenna was selected to provide the best radio frequency system coverage for the PUD meters to be read, based on the number and location of the SmartPoint transmitters to be installed throughout the City and County, terrain, foliage, height of trees, etc.

3. A site development plan shall be submitted showing the location, size, screening and design of all buildings and structures, including fences, the location, size, and nature of outdoor equipment, and the location, number, and species of all proposed landscaping;

Response: The applicant has submitted a site plan and detail sheet which depicts the location of

the new utility pole and elevations. The applicant has also provided example images from other sites as well as a Project Narrative, which details existing site conditions and provides photographs of the site.

4. The facility shall be designed to be aesthetically and architecturally compatible with the natural and built environment. This includes, but is not necessarily limited to, building design and the use of exterior materials harmonious with the character of the surrounding neighborhood and the use of landscaping and privacy screening to buffer the facilities and activities on the site from surrounding properties. Any equipment or facilities not enclosed within a building (e.g., towers, transformers, tanks, etc.) shall be designed and located on the site to minimize adverse impacts on surrounding properties;

Response: The applicant has submitted conceptual renderings which meet these requirements. The utility pole will be placed on the property in a location that minimizes adverse impacts on surrounding properties.

5. All wireless communications facilities shall comply with national, state or local standards, whichever is more restrictive, in effect at the time of application, for non-ionizing electromagnetic radiation;

Response: The antenna for the AMI system operates on a “licensed frequency that is managed by the Federal Communications Commission (FCC) and complies with Part 15 of the FCC Rules in the Code of Federal Regulations”. Part 15 regulates unintentional emissions from electronic devices. This project will comply with all federal, state, and local standards.

6. The applicant shall demonstrate a justification for the proposed height of the structures and an evaluation of alternative designs which might result in lower heights. If additional height over that allowed in the zone is justified it may be approved by the city;

Response: The system is designed to serve the entire city, not just a particular neighborhood. As such, the antenna needs to be at the proposed height of 70 feet above grade. The height and location of the proposed utility pole and antenna were selected to provide the best radio frequency system coverage for the PUD to read the meters, based on the number and location of the SmartPoint transmitters to be installed throughout the City and County, terrain, foliage, height of trees, etc.

The utility pole does not meet the LMC definition of a structure (see below) or a building therefore the increased setbacks or height limits are not applicable.

LMC 21.02.743 Structure - “Structure” means that which is built or constructed, an edifice or building of any kind, or any piece of work artificially built up or composed of parts joined together in some definite manner, except that this definition shall not include light standards, utility poles and vaults, arbors and

trellises, play equipment, benches, mailboxes, and sculptures

7. The applicant shall include an analysis of the feasibility of future consolidated use of the proposed facility with other public utility facilities.

Response: The proposal is seeking to co-locate on a site that is already being utilized for public utility infrastructure. The entire site is used to support the PUD's electrical utility and will continue to be used for this purpose as the AMI system will meter the existing utility usages and will accommodate future facilities to the extent feasible.

CONSISTENCY WITH THE COMPREHENSIVE PLAN

The proposed project site is designated Parks, Recreation, and Open Space (PRO) on the future land use map and in the Lynnwood Comprehensive Plan. The excerpts below are from the Land Use Element of the City of Lynnwood Comprehensive Plan and have been found to be relevant to the proposal.

Land Use Policy LU-3: Comprehensive Plan land use designations are as provided by Table LU-3:

- Designation: Park, Recreation and Open Space
- Primary land use: Publicly owned parks and open space
- Locations: Where demand exists and where the recreational use will not significantly impact surrounding land uses.
- Design: Low-rise structures with onsite landscaping to screen non-residential uses. Buildings will be designed to be compatible with nearby residences.

Land Use Policy LU-4: Land use policies and regulations should:

- A. Provide separation and/or buffering between incompatible land uses; and
- B. Facilitate the co-location of dissimilar uses where desired and where compatibility can be achieved.

Land Use Policy LU-43: The siting and design of public facilities should follow these guidelines:

- A. Public facilities should be located in their service area.
- B. Facilities that serve a single neighborhood should be located in such neighborhoods. Siting and design decisions should support efficient and effective operations and maximize compatibility with the surrounding area.
- C. Facilities that serve two or more neighborhoods should, where possible, be located near

the common boundary(ies) of the neighborhoods.

- D. Facilities that serve the entire City shall be easily accessible from all parts of the City and should minimize and then mitigate use-generated traffic or other impacts to residential neighborhoods.
- E. Facilities that serve regional needs shall be located in close proximity to regional transportation systems (freeways, arterials, or major public transit lines); such facilities shall minimize and then mitigate use-generated traffic or other impacts to residential neighborhoods.
- F. Regional facilities shall also be located in close proximity to supporting services.
- G. Public facilities serving regional needs should also be located near supporting or complementary uses and away from residential areas.
- H. Public facilities should not generate unmitigated significant adverse impacts on the natural or built environment.
- I. Public facilities visible from a public right-of-way should exhibit architectural detailing and similar design features that promote land use compatibility and community pride.
- J. The siting and design of public facilities should not result in disproportionate impact upon a single segment of the community.
- K. Essential public facilities should be regulated either as a permitted land use, or a use allowed with approval of a conditional use permit.

Land Use Policy LU-49: Non-residential developments that adjoin residential properties shall provide transitional screening so that non-residential activities do not significantly affect the livability of the residential properties.

Analysis:

The following is an analysis of the proposal in relation to the PRO land use designation and public facilities siting criteria.

Primary Land Use and Location: *The subject property is designated on the City of Lynnwood Comprehensive Plan Future Land Use Map as Park, Recreation, and Open Space (PRO). The implementing zone for PRO is P-1. Though a public facility is not the primary land use for PRO, Policies LU-4 and LU-49 (above) explain that dissimilar uses that are compatible may be allowed when appropriate measures are taken so that the non-residential activities do not significantly affect residential properties. The existing project site is a PUD-owned property for public utility use. The addition of the AMI system will not contribute to significant impact on residential properties.*

Design: Facilities that serve the entire City shall be easily accessible from all parts of the City and should minimize and then mitigate use-generated traffic or other impacts to residential neighborhoods (Land Use Policy LU-43). The utility system will serve all of the City of Lynnwood. It is located within the boundaries of an existing publicly owned site, which is less intrusive to the community than obtaining a new site or expanding the existing boundaries of the current site. The site is screened with mature vegetation. Tall conifers and deciduous trees surround the parcel, providing a visual barrier between the differing uses and providing a more aesthetically pleasing site. The proposal will not violate any of the goals or policies in the Community Character element of the Comprehensive Plan. It will not add any additional light sources. While construction-related noise is anticipated, it will be in conformance with the City’s noise ordinance and the surrounding vegetation will serve as a buffer to reduce impacts. After construction, the AMI system will not generate any additional noise.

SITE PHOTOGRAPHS

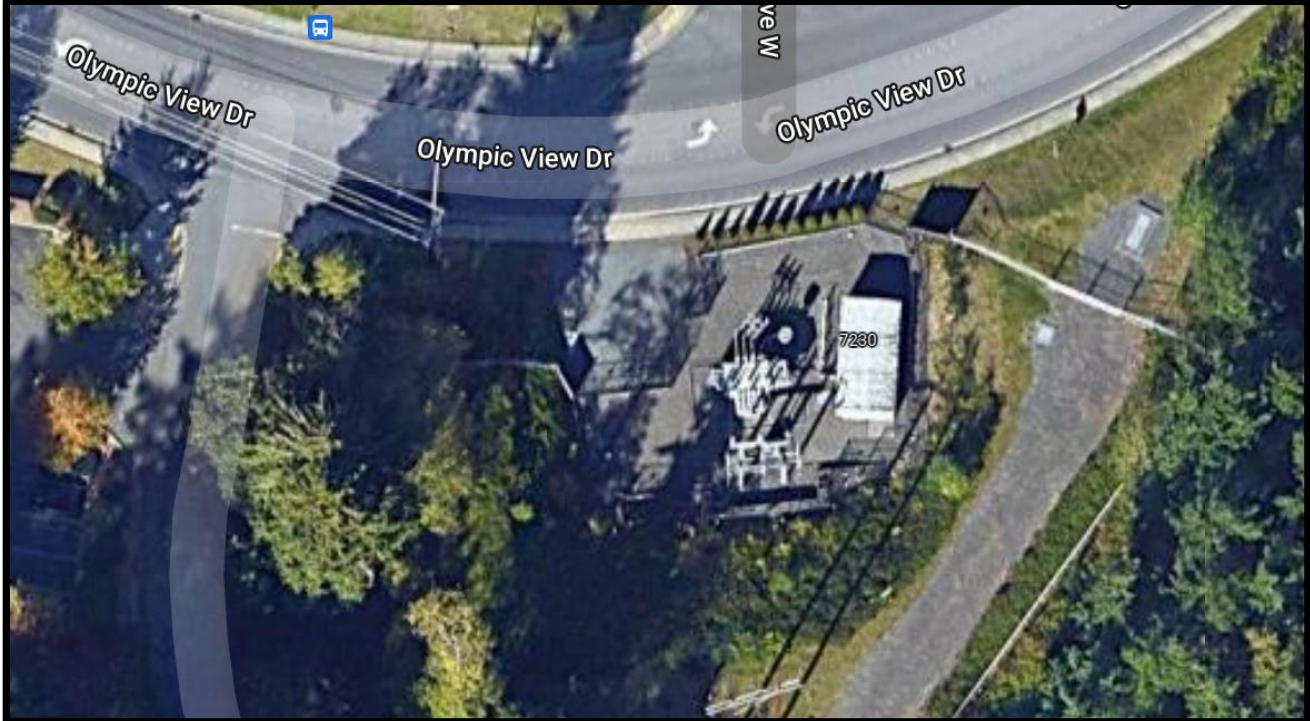


Figure 1. Google Earth aerial of the existing site.



Figure 2. Project location, Google Street view image from Olympic View Drive (taken September 2021), view facing towards the project site. Arrow depicts location of proposed AMI pole.



Figure 3. Example of AMI pole/base station/antenna installed at the Bunk Foss Substation site in Snohomish County.