

PROJECT NARRATIVE
WCF CONDITIONAL USE PERMIT (CUP) APPLICATION
(AT&T SN5417 Browns Bay RELO Site)
Submitted to City of Lynnwood, Washington
Department of Development & Business Services – Planning & Zoning
Submitted: September 15, 2026

Applicant: New Cingular Wireless PCS, LLC (“AT&T”)
20309 North Creek Parkway
Bothell, WA 98011

Representative: Centerline Communications
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Maple Valley, WA 98038
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Property Owner: Edmonds School District
20420 68th Avenue W
Lynnwood, WA 98036

Project Address: 6505 168th Street SW
Edmonds, WA 98020

Description & Tax Lot: GPS Coordinates: 47.84812, -122.32421
Parcel No.0051310001000

Zoning Classification: Public Institution (P-I)

As the authorized agent, Centerline Communications is submitting a Conditional Use Permit (CUP) application on behalf of New Cingular Wireless PCS, LLC (“AT&T”).

1. PROJECT OVERVIEW

Centerline respectfully submits this application for a conditional use permit on behalf of AT&T (“Applicant”) to install a new wireless communications facility (“WCOM”) on an existing light standard that serves the Meadowdale Playfields. The project involves replacement of the existing 84-foot pole with a 99-foot pole. This height increase will allow AT&T to meet its coverage objectives, as well as the separation requirements from the field lights. The operating ground equipment will be at the base of the pole secured with a 14’x15’ secured lease area.

This facility will replace the existing WCOM located at the Snohomish County PUD Meadowdale Substation. Snohomish County PUD requires removal of the existing facility no later than June 10, 2027. AT&T understands that the relocation is required in order to accommodate planned improvement at the Snohomish County PUD Meadowdale Substation. 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 was 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. Therefore, a collocation at Meadowdale Playfields was identified as an ideal location to maintain and improve AT&T’s outdoor, in-vehicle and in-building coverage to the areas surrounding the parcel as well as provide new dominant 4G & 5G coverage and capacity resulting in few dropped calls, improved call quality, access to additional wireless services the public demands, and most importantly, ensuring coverage for emergency services in the area.

This application of the proposed Wireless Communication Facility (WCF) includes the following documents (“AT&T’s Application”):

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|-----------------|---|
| • Attachment 1 | CUP Project Narrative (this document) |
| • Attachment 2 | Statement of Code Compliance |
| • Attachment 3 | Property Owner Authorization Email |
| • Attachment 4 | AT&T FCC License |
| • Attachment 5 | AT&T Radiofrequency (RF) Justification Report |
| • Attachment 6 | AT&T RF Statement of Compliance |
| • Attachment 7 | Collocation and Removal Statement |
| • Attachment 8 | Phase 1 Environmental Assessment Report |
| • Attachment 9 | Noise Report |
| ▪ Attachment 10 | RFSSRP Report |
| • Attachment 11 | Photo Simulations |
| • Attachment 12 | Land Use Plan Set |
| | ▪ Site Plan |
| | ▪ Vicinity Map |
| ▪ Attachment 13 | Ownership Affidavit |

As demonstrated in AT&T’s application, the proposed Facility meets the applicable Lynnwood Development Code (Chapter 8.04.09) criteria for siting new wireless communications facilities, as well as compliance with all other applicable county, state, and federal regulations. The proposed location was carefully selected to minimize any impact to current property use or the surrounding community.

Additionally, there are two other carriers at the ballfields utilizing a light standard to support their aerial equipment. Thus, the proposed WCOM is the least obtrusive means of filling AT&T's impending service gap; and AT&T respectfully requests City of Lynnwood approve this project as proposed, subject only to the standard conditions of approval.

Please Note: All references to "Attachments" in this Project Narrative and the Statement of Code Compliance are in reference to the attachments included as part of AT&T's Application.

2. PROPOSED PROJECT DETAILS

2.1. Subject Property. Detailed information regarding the subject property and proposed lease area is included in **Attachment 12, Land Use Plan Set—Sheet A-2.**

2.1.1. Proposed Location; Use; Zoning.

- The site is approximately 26.63 Acres and zoned Public-Institutional (P-I). The property is divided into 2 separate areas (divided by 66th Avenue W) with Meadowdale Playfields on the west side and a school on the east side. The topography is flat, and there are many existing trees on the perimeter of the property. Surrounding land uses include:
 - North: Single-Family Residences, Undisturbed Forested Area
 - South: Large-Lot Single-Family Residences; School
 - East: School (east side); Residences
 - West: Single-Family Residences

2.1.2. Lease Area.

- The total lease area is 13'-10"x15'-3" (approximately 210 square feet). This leased area will be surrounded and secured by a 6-foot height chain-link fence plus one foot for barbed wire (7' total height) (the "Lease Area"). Surrounding the fence is a proposed 5ft landscaping buffer. Inside the compound, AT&T will have their operating equipment.
- A 10-foot-wide ground easement to provide power and fiber from N. Meadowdale Road is required to operate the facility.
- At the request of Lynnwood Parks and the Edmonds School District, there will be protective netting over the compound to prevent aerial objects from landing inside.

2.1.3. Access and Parking.

- Access to the site is provided from the existing parking lot with an entrance off of 66th Avenue W.

2.1.4. Utilities.

- **Power.** Power will be provided by Snohomish PUD via a new service commencing from N Meadowdale Road. The applicants will obtain access and utility easement rights as part of the entitlement process with the owners of the property. The applicant will install a new meter within the equipment compound as shown in **Attachment 12, Land Use Plan Set.**
- **Fiber.** Fiber will be provided through a designated provider. There will be a fiber

vault installed with fiber running south through the proposed easement area to the compound from N Meadowdale Road.

2.2. Wireless Facilities and Equipment. For additional details and specifications, including a site plan, please refer to **Attachment 12, Land Use Plan Set—Sheet A-2.**

2.2.1. AT&T Antennas and accessory equipment.

- The Facility will include a 99-foot (+ 5' lightning rod) replacement ballfield light that will accommodate up to the following AT&T equipment:
 - Nine (9) Panel Antennas
 - Nine (9) remote radio head units (RRHs)
 - Three (3) RRH mounts
 - Two (2) surge protectors
 - One (1) 3-Sector V-Frame antenna mount
 - One (1) lightning rod
 - All other associated and accessory equipment
- Utilizing an existing structure does not preclude future collocation by others.

2.2.2. AT&T Ground equipment.

- Two (2) equipment cabinets (one walk-up)
- One (1) generator w/ concrete pad
- One (1) Cable Bridge
- One (1) GPS
- Fiber/cable vaults
- All associated and accessory equipment

3. NETWORK COVERAGE AND SERVICES.

3.1. Overview—AT&T 4G & 5G 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 5, AT&T Radiofrequency (RF) Justification Report.**

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. 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.

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.

3.2. Network Service Objectives for Proposed Facility.

The proposed facility is intended to provide coverage replacement and improved service in the City of Lynnwood. As described in the Project Overview, the candidate will provide dominant 4G & 5G LTE coverage along 168th St SW and Olympic View Dr, and to the surrounding residences (collectively, the “Targeted Service Area”). These objectives are currently being met by AT&T’s existing WCOM to be removed.

It is essential that AT&T maintains this existing coverage for residents, businesses, and first responders. More than 75% of adults are now “wireless only”, meaning that they live in homes without a landline phone¹. Wireless services allow our communities to stay connected to work, home, school, and loved ones around the world. Additionally, mobile technology is essential to our ability to reach emergency services when needed. In Washington State, more than 80% of emergency 911 calls are made on wireless devices². When seconds matter, reliable connectivity is essential.

4. FIRSTNET

In addition to providing customers with reliable coverage, fast speeds, and excellent quality, the proposed project will include facilities to support the Nationwide Public Safety Broadband Network (“FirstNet”). In its partnership with the First Responder Network Authority, AT&T is responsible for building, maintaining, and upgrading the FirstNet network for the next 25 years. In order to support FirstNet, AT&T is upgrading its existing wireless sites and building new wireless facilities throughout the United States, including within the relevant local municipality/Thurston County. AT&T’s upgrades include deployment of the new frequency band (“**Band 14**”) supporting the FirstNet network. In 2012, the U.S. Congress set aside Band 14 for use by first responders. FirstNet Built with AT&T is designed to be reliable, functional, safe, and secure, and it will provide optimal levels of operational capacity at all times.

FirstNet’s benefits include:

- Always on, 24x7 **priority and preemption** for First Responders across data and voice communications; and
- A physically separate and highly secure network core that is fully dedicated to FirstNet – utilizing end to end encryption and keeping public safety and emergency management traffic separate from commercial traffic; and
- A dedicated fleet of portable network deployable assets to support first responder and emergency manager connectivity for planned events, emergencies, in extremis, and other mission requirements.

5. **SEARCH RING.** AT&T’s radio frequency (“RF”) engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the Targeted Service Area.

¹ *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July – December 2024.* National Center for Health Statistics. <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf>

² <https://www.911.gov/issues/911-stats-and-data/>

From this study, AT&T's RF engineers identified a specific geographic area or "search ring", where a WCOM may be located to provide effective replacement coverage to an area currently served by AT&T's network by the substation facility. The search ring established for this proposal is provided in **Attachment 5, RF Justification Report**. 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. A collocation at Meadowdale Playfields was identified as an ideal location to maintain and improve AT&T's outdoor, in-vehicle and in-building coverage.

6. **ALTERNATIVE SITES ANALYSIS.** This project is a relocation of an existing facility at the Snohomish County PUD Meadowdale Substation (east of this proposal). As identified in the RF Justification, there will not be adequate service with the loss of a facility in this area. The closest other AT&T 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 was 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. Therefore, a collocation at Meadowdale Playfields was identified as an ideal location to maintain and improve AT&T's outdoor, in-vehicle and in-building coverage facilities are shown in **Attachment 5, RF Justification Report**.

As this will be a "gap" coverage site, it is intended to 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. 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. Additionally, AT&T's radio frequencies do not penetrate mountains, hills, rocks, or metal, and are diminished by trees, brick and wood walls, and other structures. In this instance, the project site is more open, but there are residences surrounding the property. The utilization of an existing stadium light helps minimize the visual impact by utilizing existing vertical infrastructure rather than adding to proliferation of vertical infrastructure.

The search ring includes this property (other location on the premises) as well as the adjacent school to the south.

- There are no existing WCF towers within the search area that would meet coverage objectives, and the existing AT&T facilities shown in **Attachment 5 – RF Justification** will not adequately meet the demands for coverage to this area.
- Structures within the Search Ring are primarily one- to two-story single-family residential structures on residentially zoned properties. Collocation is a preferred option; however, there are no opportunities other than the light standard(s) for the ballfields.
- Utility poles are allowed for collocation; however, those were not of sufficient height and could not provide sufficient ground space for equipment.

7. APPLICABLE LAW

7.1. Local Codes. Pursuant to the Lynnwood Unified Development Code (LUDC) 8.35.0265, detached Wireless Communications Facilities (WCOM) less than 300ft from residential zones require a Conditional Use Permit (CUP). See **Attachment 2, Statement of Code Compliance** for

AT&T's demonstration of compliance with the applicable code sections.

7.2. 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.

7.2.1. Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibit 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 2018³, a local jurisdiction's action has the effect of prohibiting the proviso of wireless service 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."⁴ 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 terms of adding capacity, updating to new technologies, and/or maintaining high quality service.⁵ While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless 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.

7.2.2. Environmental and health effects are 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 provided in this application a statement from its radio frequency engineers demonstrating that

³ *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018) ("FCC Order").

⁴ *Id.* at ¶ 35.

⁵ *Id.* at ¶¶ 34-42.

the proposed facility will operate in accordance with the Federal Communications Commission's RF emissions regulations. **(See Attachment 6, ATT RF Statement of Compliance.)** Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed site should be disregarded in this proceeding.

7.2.3. No discrimination amongst providers. Local jurisdiction also may not discriminate against 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.

7.2.4. 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.* According to the Shot Clock rule, a reasonable period for local government to act on wireless applications is 150 days for a new facility application.

The Shot Clock applies to all authorizations required for siting of a wireless facility, including the building permit, and all application notice and administrative appeal periods. Pursuant to federal law, the reasonable time period for review of this application is 150 days.

Thank you for your time and consideration in the review of this request. Please feel free to contact me by phone (206.227.7445) or email (pkitzes@clinellc.com) if there are any questions or comments.

CENTERLINE COMMUNICATIONS

Phil Kitzes

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Project Manager