



Received
 Planning Division
 03/10/2023

PROJECT NARRATIVE

CUP & Design Review CU2022-0011 / DR2022-0135

I. GENERAL INFORMATION

Project Name: Comcast Beaverton – emergency power generator replacement

Applicant: Comcast, c/o Lynx Consulting, Inc.
 Ed Fournier
 17311 135th Ave, NE, Suite A-100
 Woodinville, WA 98072
 Email: Ed@LandServicesNW.com
 Phone: 503-260-0350

Parcel Number: Tax Map: 1N131AB Tax Lot: 01400

Property Address: 1750 NW 173rd Ave., Beaverton, OR

II. PROJECT DESCRIPTION

At the Comcast data center, replace two existing backup power generators with three new generator units with eventual placement of a fourth generator unit. This is an ancillary use to the existing Comcast data center and offices at this location. Added electrical switchgear shall be placed northeast of the generator units. The existing generator units are at their end of service life and need replacement. Multiple smaller units will allow for redundancy and scalability for emergency backup power to keep this extremely vital communications hub active in the event of a manmade or natural disaster causing power disruption to this data center facility. A screen wall shall be placed south and west of the units to screen the new generators from views to the roadway to the west and school to the south. There will be no change to the traffic generation, operating hours, or employees due to this generator replacement. A Design Review application is needed for the generator unit placement and a CUP needed as a prior CUP

was not needed by Washington County at the time of development, prior to this parcel incorporation into the City of Beaverton.

III. CODE COMPLIANCE NARRATIVE

Below is a narrative addressing Code Sections as identified during the pre-application meeting with City Staff.

20.15.15 per table 20.15.15, in the office industrial zone minimum setbacks are 75 feet to any residential zone, 35 feet to the front, 10 feet to any side, and 0 feet to the rear. As is shown on the attached site plans the generator replacements will be in compliance with these setbacks, as an accessory use to the Comcast facility. The proposed generator and wall height will also be below the 80 foot height maximum.

20.15.20 per table 20.15.20.A, in the office industrial zone, #25 utilities is listed as a conditional use. This is a central office hub facility for Comcast a telecommunications utility, with existing buildings on site supporting office and data center usage. The proposed replacement generators are in support of this Comcast facility.

20.15.30 Supplemental Development Requirements

1. Off street Parking and Loading. No change to the existing parking or loading is proposed with this application.
2. Adjacent residential zoning district. No service road or storage area is proposed with this application.
3. Required Conditions. The proposed replacement backup power generators will be behind a screen wall which will prevent public views to the west and to the south. No vehicle storage lot is proposed and the proposed application will not attract insects, rodents, or create a health or fire hazard.
4. Performance Standards. The proposed replacement generators will not cause excessive vibration, orders, or heat and glare; just as the existing generator units do not. The generators shall be secured to large concrete foundations similar to the existing generator units which shall be replaced. The generators will have a full emissions system integrated into the shroud to

eliminate any odor issues. Heat and glare will not occur as the generators are not only fully enclosed in a sound attenuating shroud but also shall be behind a screen wall.

40.03.1 Facilities Review Committee

A. This is a private Comcast facility secured against public access. A service provider letters for Clean Water Services is provided with this application, as well as TVFR. Police service has been historically adequate for this facility and no new employees are to be added by the generator replacement. No change to the number of employees at this site will happen, and thus not increase the need for water, sewer, school, bike / pedestrian, or transportation services. All of these services have been historically adequate and will remain so. The TVFR has supplied a service provider letter, showing service levels are adequate. As such, the services provided by police, water / sewer, schools, roads, and the fire department will remain adequate for this existing use. Replacement of the backup generators will make no change to the vehicle trips, number of employees, nor modify the existing needs for existing public facilities and services.

B. Please see the above narrative for subsection A.

C. A narrative earlier in this code compliance narrative addresses the applicable portions of Chapter 20.

D. A narrative later in this code compliance narrative addresses the applicable portions of Chapter 60. The visual impact of the replacement generator units is being mitigated by the placement of a screen wall. The existing generator units and fuel tank will then be removed. No other changes are proposed to the building exterior parking or fencing areas.

E. Replacement of the backup power generators will in no way impact the periodic maintenance and replacements needed at this existing private secured facility.

F. This is a private facility not open to the public and existing on-site pedestrian and vehicular circulation is for Comcast employees only.

G. Replacement of the backup power generators will in no way impact the existing pedestrian and vehicle circulation and connection to the surrounding circulation systems at this existing private secured facility. There are two driveways to the adjacent public roadway and a walkway

to the adjacent sidewalk from the pedestrian access gate. No changes are proposed to the on-site walkways or vehicle circulation routes on site.

H. A service provider approval has been provided by TVFR The facility has been in place for decades and shown to be adequate for fire protection. Replacement of existing power generators will not have an impact upon this.

I. This is a fully fenced and secured private facility. Replacement of the existing backup power generators will not have an impact upon crime.

J. No significant grading is proposed as the replacement generator unit shall be placed in an existing level gravel area.

K. This is a private and secured comcast facility. Replacement of the existing backup power generators will not have an impact upon access.

L. Application materials needed for the Conditional Use and Design Review are submitted with this application.

40.15.15.5. New conditional Use.

C. Approval Criterion

1. A conditional use application and code compliance narrative are supplied demonstrating threshold requirement compliance.

2. Application fees shall be paid online or over the phone as maybe acceptable to the city.

3. City staff provided two goals for this application to comply with:

- Goal 3.9.1 Successful employment lands
 - Policy 3.9.1.a: Emphasize and prioritize employment and industrial uses – ensure other uses allowed within these plan designations support and do not detract from the desirability of these areas for employment and industrial uses.

Replacement of the existing backup power generators with new units will not detract from the desirability of the area. In fact, the new units shall be behind a screen wall to hide the units, unlike the existing backup generator units.

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- Goal 3.9.2 Employment Areas: provide desirable locations for mix of office and flexible employment space and complementary uses.
 - Policy 3.9.2.a: Provide for a mix of office, industrial, and other employment space and complementary uses such as retail, restaurants, hotels, and services to meet the needs of businesses and employees.

Replacement of the existing backup power generators with new units will not change the mix of office industrial and other uses. The existing main use of the property has a Comcast data center will remain unchanged as the generator units are an accessory use to this Comcast facility.

4. Existing site configuration, topography, and man-made features can easily accommodate the proposed replacement generator units.
 5. The proposed design for the replacement generator units will be an improvement over existing conditions as the proposed units shall be behind a screen wall whereas the existing generator units and associated fuel tank are not screened.
 6. The proposed application is not a residential use.
 7. The parcel is not interim Washington County and incorporated within the city of Beaverton.
 8. Further applications and materials will be submitted as may be needed.
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40.20 Design Review

40.20.15 Application

3. Design Review Three

A. Threshold. Per the pre application meeting this proposal will be at the threshold 9 level.

C. Approval Criteria

1. The application meets the threshold requirements for design review 3 as is demonstrated with this narrative and the provided application materials.
2. Application fees will be paid online or over the phone with a credit card yes maybe available by the city.
3. This is a threshold 8 application in this criterion is not applicable.
4. Compliance with code section 60.05.35 through 60.05.50. This proposal is limited in scope and proposes replacing existing backup generators with proposes replacing existing backup generators with new units. The property is fully developed with the Comcast data center facility parking and landscaping. This is a private secure facility and not open to the public. Existing on-site improvements prevent full implementation of the guidelines of this chapter, as the property

is fully developed with a data center hub building, parking and maneuvering areas, etc. Please see the specific narrative below for section 60.05.35 through 60.05.50

5. The proposed area for the replacement generators is over 75 feet from the nearest property line and is a level gravel area at this time. No appreciable change to the grade or any landscaping disturbance is proposed.

6. No phasing is proposed with this application.

7. Further in this application narrative, the applicable parts of sections 60.05.15 through 60.05.30 are addressed.

8. Further in this application narrative, the applicable parts of sections 60.05.35 through 60.05.50 are addressed.

60.05.20 circulation and parking standards.

2. Loading areas, solid waste facilities, and similar improvements.

A. On site screening. The proposed replacement backup power generators shall be behind a screen wall and fully screened from view to the South and public road to the West.

C. Screening design. The proposed replacement backup power generators shall be screened with a wall 1 foot higher than the proposed generators with masonry block materials similar to that of the existing building. The masonry blocks used on the main building are smaller than those proposed for the screen wall construction, but shall be a similar red color. Note the photo simulations provided with this application. Similar style masonry materials are used for on-site screening at this time, but are a gray color. The applicant's intent is to use a masonry material, a block type that is currently used for screening on the property and a color for the new screen wall matching the existing building. Please see existing site conditions photos exhibit to this application.

3. Pedestrian circulation.

B. Walkways. This is a private secured facility not open to the public. Existing walkways and driveways are in place connecting the building to the public right of way to the West. No changes to the existing facilities are proposed, as these have been historically shown to provide needed access to the public right-of-way via the access gate on the west of the property. Please note on the site plans sheet C-2 Existing Site Plan there are existing walkways on the south and east of the proposed replacement generator area. This connects to the main building entrance on the west and rear service entrance on the south east side of the existing main building. There will be no

change to the existing pedestrian circulation on site to the building entrances due to the back-up power generator replacements proposed.

E. Pedestrian connections. Existing on sidewalk base are concrete and the paving material for parkways and roadways is asphalt. This is a fully secured private facility with no public access permitted and no changes to the walkways or roadways on site are proposed.

F. Pedestrian walkways. Existing on sidewalk base are concrete in compliance with the width minimum. This is a fully secured private facility with no public access permitted and no changes to the walkways on site are proposed.

60.05.25 landscape, open space, and natural areas design standards.

5. Minimum landscape requirements for non-residential development in mixed use development.

A. Minimum landscaping. The existing backup power generator replacement is occurring in an existing gravel area. No impact or reduction to existing landscaping is proposed with this application, and the existing landscape areas exceed the required 10% of the lot area per drawing page L-1 calculations. The site is fully developed at this time with building footprints, loading, parking, and circulation areas. Expansion of landscaped areas is not possible due to existing on site improvements.

B. Plantings and landscape areas. As is mentioned in the narrative above for Section 60.05.25.5.A, the site is fully developed, and no reduction to existing landscape areas are proposed. As part of this application the applicant will replace any missing landscaping as denoted upon the landscape plan submitted as part of this application, and as much as possible new / embellished B-2 landscaping placed along the western fence on the property and B-3 landscaping placed along with southern fence of the property.

9. Fences and Walls. The proposed wall shall be made out of CMU blocks and more than the minimum of 6 inches thick. No chain link fencing is proposed with this application.

11. Stormwater Management Plan. A stormwater management plan has been derived by an Oregon licensed Professional Engineer and a submittal item with this application. The plan is to add a new catch basin and connect this to an existing catch basin on the property. In the report, the Engineer proposes a fee-in-lieu payment instead of attempting to construct a new on-site detention system, as this would be land intensive and less practical.

13. Landscape buffering and screening. Please see the narrative response to section 60.05.25 above and section 60.05.45.11 below. Unfortunately, as the property is fully developed and no additional space available to increase the existing landscape area is available along the southern property line to the B-3 standard. Per the site plans open areas are currently landscaped and there are parking and maneuvering areas in place within 30' of the southern property line. Landscaping is to be embellished on the western property to meet the needed B2 standard. In addition, added landscaping will not improve the screening of the proposed replacement backup power generators as the units shall be fully screened to the west and south by the proposed

screening wall structure. Further the existing west and south fenced are both chain link with sight obscuring slats.

60.05.30 lighting design standards.

1. On site lighting and glare reduction. This is a private secure facility and not open to the public. No change to the existing lighting is proposed with this application. Lighting exists on this site that is shielded and provides lighting at building entrances, walkways and for vehicle circulation. A lighting plan and report has been provided with this application addressing City Standards. This report shows the existing lighting from pole and non-pole mounted lighting provides overlapping lighting coverage on pedestrian walkways and vehicle maneuvering and parking areas.

2. Pedestrian scale on site lighting. This is a private secure facility and not open to the public for pedestrian or vehicular access. No change to the existing lighting is proposed with this application. A lighting plan and report has been provided with this application. This analysis shows the existing lighting from pole and non-pole mounted lighting provides overlapping lighting coverage on pedestrian walkways and vehicle maneuvering and parking areas. While the pole mounted lights are 1' lower than current City Code, the illumination level is greater than the City requirement, and as such in compliance along pedestrian walkways in the area of the proposed replacement back-up generator units.

60.05.35 Building Design & Orientation Guidelines.

1 – 4. These sections are not applicable as no new building is proposed with this application.

5. Screening of Equipment. The new equipment shall be fully screened as shown on the proposed plans and discussed in this narrative.

6 – 10. These sections are not applicable as no new building is proposed with this application

60.05.40 circulation and parking design guidelines.

1. No changes to the pedestrian, auto and bike circulation is proposed and existing connections has historically proven adequate. An existing pedestrian walkway serves the existing and

proposed generator replacement area on this property with connection to the existing main building.

2.A. The proposed replacement backup power generators shall be screened from the adjacent abutting public street to the west and the south with a new screen wall made of masonry blocks.

2.B. No new loading areas are proposed with this application.

3. See the narrative for section 1 above.

4-9. These sections are not applicable as no changes to the parking, circulation, or pedestrian routes are proposed.

60.05.45 Landscape, Open space & Natural areas.

1 – 2. These sections are not applicable as this parcel is not in a residential zone.

3. The existing landscaping shall be embellished as is shown on the landscaping sheet in the design drawing set. All existing landscaping and trees shall be retained and new landscaping added that is diverse in species.

4 – 8. These sections are not applicable to the replacement of an existing back-up power system generators.

9. A stormwater and design report has been produced to address runoff from the proposed generator area.

10. This section is not applicable to the replacement of the back-up generator power system.

11. The existing landscaping shall be retained, missing landscaping replaced, and added trees / landscaping added. Please see the landscaping plan sheets supplied with this application as well as the narrative discussion for Section 60.05.25.13.

A – Except for existing areas needed for parking and maneuvering, a B-3 landscape buffer will exist along the southern parcel line of the property. Further, per the landscape plan, the area for the B-3 buffer to the south will have higher plant density than required by Code to overcome the existing hardscape (paved) area restrictions. A B-2 landscape buffer will be established along the western side of the property, except for existing needed driveway and walkway areas. To the south, there is a great deal of horizontal separation between the school building and the area of the replacement back-up generators. There is approximately 200' from the proposed screen wall to the nearest part of the school building to the south. The existing and embellished landscaping will supply separation and enhance the horizontal separation between the proposed replacement generator units and the uses to the south and west of the units behind the screen wall.

B – The replacement of the existing back-up power generator units will have no change to the existing use of the property, and no added impact on the adjacent uses. The Applicant is not aware of any adverse impacts from the existing back-up power generator units that shall be replaced. The new units will be behind a screen wall and existing landscaping replaced and embellished, further providing increased screening from uses to the west and south.

C – Please see the proposed landscape plan. The design uses existing and added species of plantings to achieve this criterion. The character and intensity of the use of this existing development is not changed by the replacement of the back-up power generator units.

D – As can be seen on the proposed landscape plan, a B-2 landscape buffer is created on the western part of the property to the street to the west. On the southern part of the property a B-3 buffer 20' wide where possible is achieved. A substantial amount of this 20' wide B-3 buffer shall be in places as much as possible. Exceptions are for existing parking spaces that will not

permit a full 20' wide buffer, and an existing needed hammer head turnaround for large delivery, service, and emergency vehicles located at the southeastern part of the parcel. Further as is noted on the landscape plan in the note for the 20' B-3 landscape buffer, "Due to the hardscape restrictions, higher shrub and tree planting has been provided." The B-3 landscape buffer to the south is being achieved as much as possible, except for existing paved areas, and the density of the plantings in the southern area will be greater than required for the B-3 criterion to help embellish the screening and buffer to the south.

60.05.50 Lighting Design

No changes to the existing lighting plan are proposed by this replacement of the back-up power generator system. An on-site investigation, lighting mapping diagram, and report with lighting type specifications from the Transpo Group is provided with this application. There is an existing mix of pole and non-pole mounted lights offering multiple levels of on-site lighting coverage for pedestrian and vehicle routes and circulation.

60.50 special use regulations.

60.50.05. Accessory uses and structures.

1. The proposed placement backup power generators are an accessory use and subordinate to the primary use of this property as a Comcast data center.
2. The emergency backup power generators proposed are not a building but will comply with the setback requirements and 15-foot maximum height requirement as well.

60.50.25 uses requiring special regulation.

11. Noise Levels. As an emergency power backup generator, the units are exempt from state of Oregon and City noise level code. However, the replacement generator units will have a full emission system, the generator unit enclosed within a sound attenuating shroud, and in addition the overall generator area screened by a wall on the west and south.

12. Air Quality. Just as with the existing backup emergency power generators which are being replaced, the proposed units are diesel powered, and have a full emissions system as part of the replacement generators and will be in line with State code.

60.60 Special Requirements.

60.60 Trees and Vegetation. The development area proposed for the replacement power backup generators is a large graveled area adjacent to the data center building and parking lot. It is not a landscape area and no impact to existing trees or vegetation is proposed. The applicant has reviewed the Washington County approval (00-234-D) for the existing building and generators. As part of this application, the applicant will replace any missing landscaping, as well as embellish, as denoted upon the landscape plan submitted (drawing sheets L-1 and L-2) as part of this application.

60.65 utility undergrounding. All existing utilities are underground at this secure private facility. The replacement backup generators and the associated adjacent switchgear must be located

above ground to be functional. A new screen wall to the west and south will fully screen the new equipment.

Submittal Items List:

- CUP application with checklist
 - Design Review application with checklist
 - Materials Description
 - Pre-Application Notes
 - Neighborhood Meeting materials
 - Code Compliance Narrative
 - Full design construction drawing set
 - Photo Simulations
 - Service Provider Letter – CSW, Water Department, TVFD
 - Stormwater Plan
 - Illumination Analysis
 - Noise Study for replacement generator units
 - Existing Site Conditions photos
 - Completes Reply Letter
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