



Aviation Division  
7702 Terminal St SW  
Tumwater, WA 98501  
360-709-8015 / FAX: 360-709-8009  
Toll Free: 1-800-552-0666  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

March 12, 2025

Amy Rusko  
Planning Manager  
City of Arlington  
18204 59th Dr. NE,  
Arlington WA 98223

RE: Snohomish County PUD Battery Energy Storage (PLN #1311)

Dear M. Rusko:

Thank you for the opportunity to provide comments regarding PLN #1311. The Washington State Department of Transportation (WSDOT) Aviation Division has reviewed this application. We support this project with some concerns that will need to be addressed.

WSDOT's Airport Land Use Compatibility Program addresses elements of safety, airspace hazards, noise, and land use in relation to public-use airports. Based on guidance in the WSDOT Airports and Compatible Land Use Guidebook, the proposed project is in Airport Compatibility Zone 6. Within this zone, utilities developments are permitted. Based on our assessment, the project would be compatible with the Arlington Airport. However, plans should be reviewed to ensure they will not create height hazard obstructions, smoke, glare, electronic interference, wildlife attractants, or any other airspace hazard.

As part of the WSDOT project assessment, as a courtesy, we review the FAA obstacle notification requirements for the site. The FAA will likely request notification (see example assessment below). It is recommended that project sponsors review the site plan and elevations of buildings, powerlines, etc., to determine the requirements for FAA notification. For more information about the FAA's Notice Criteria, see [here](#). In addition, because solar panels will be moved on the site, the FAA will also likely require a glare study. For more information, visit [here](#).

Lastly, given the location's proximity to the airport, it should be noted that the property may experience low-flying aircraft, aircraft and propeller noise, vibrations, and exhaust fumes, which may be perceived as a nuisance to future users.

We appreciate the opportunity to offer written comments. Our office is available for any questions or further discussions. Please get in touch with me anytime at 360-890-5258 or [isond@wsdot.wa.gov](mailto:isond@wsdot.wa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Ison'.

David Ison, Ph.D.  
Aviation Land Use Planner  
WSDOT Aviation Division

## Hypothetical FAA Notice Criteria Tool Results

* Structure Type:	POWER_PLANT   Power Plant
Please select structure type and complete location point information.	
Latitude:	48 Deg 09 M 22 S N
Longitude:	122 Deg 09 M 01 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	119 (nearest foot)
Structure Height :	19 (nearest foot)
Is structure on airport:	<input checked="" type="radio"/> No <input type="radio"/> Yes
<input type="button" value="Submit"/>	

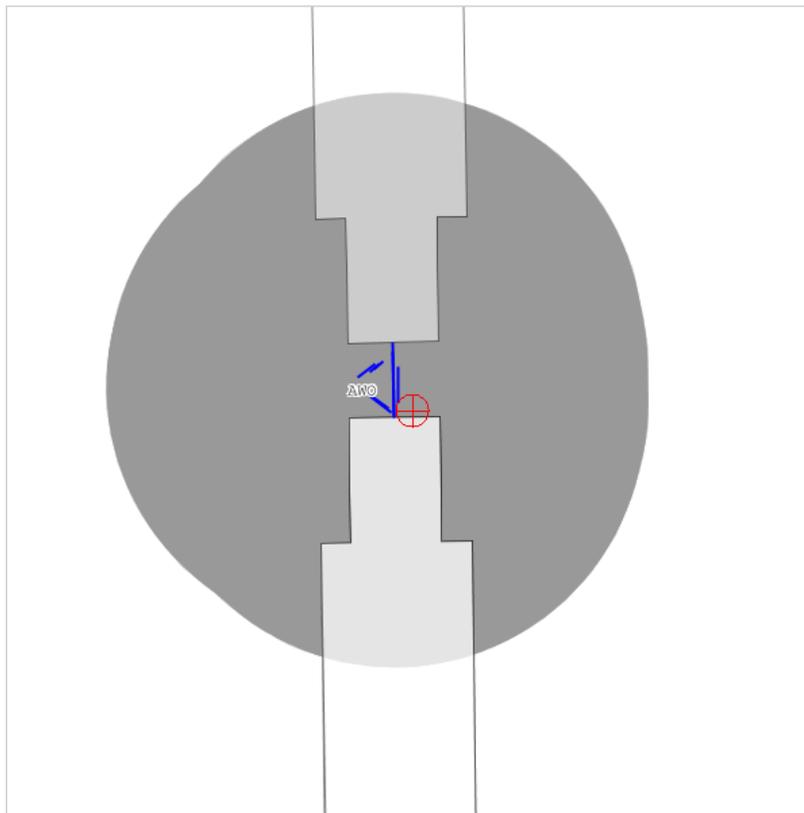
### Results

You exceed the following Notice Criteria:

Your proposed structure is in proximity to a navigation facility and may impact the assurance of navigation signal reception. The FAA, in accordance with 77.9, requests that you file.

77.9(b) by 1 ft. The nearest airport is AWO, and the nearest runway is 16F/34F.

The FAA requests that you file



**From:** [Amy Rusko](#)  
**To:** [WSDOT Aviation Land Use Inquiries and Application Submittals](#)  
**Subject:** RE: [EXTERNAL] City of Arlington - Snohomish County PUD Battery Energy Storage - Public Notice  
**Date:** Wednesday, March 12, 2025 5:03:00 PM  
**Attachments:** [image001.png](#)

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David,

Thank you for your comments. I will provide the comments to the applicant, Snohomish County PUD, and the Arlington Airport. The comments will also become part of the official record and I or someone from the above companies will reach out if we have any questions about the information you have provided.

Sincerely,  
*Amy Rusko*



Amy Rusko, AICP, CNU-A  
Deputy Director  
Community & Economic Development  
Phone: 360-403-3550  
Email: [arusko@arlingtonwa.gov](mailto:arusko@arlingtonwa.gov)  
Website: [www.arlingtonwa.gov](http://www.arlingtonwa.gov)  
18204 59<sup>th</sup> Ave NE, Arlington, WA 98223

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**From:** WSDOT Aviation Land Use Inquiries and Application Submittals  
<AviationLandUse@WSDOT.WA.GOV>  
**Sent:** Wednesday, March 12, 2025 1:37 PM  
**To:** Amy Rusko <arusko@arlingtonwa.gov>  
**Subject:** RE: [EXTERNAL] City of Arlington - Snohomish County PUD Battery Energy Storage - Public Notice

**This message is from an External Sender**

This message came from outside the City of Arlington

M. Rusko,

See attached comment letter.

Cheers,

David Ison, PhD | Aviation Planner

Emerging Aviation Technologies & Land Use Compatibility  
Washington State Department of Transportation  
[david.ison@wsdot.wa.gov](mailto:david.ison@wsdot.wa.gov) C: 360-890-5258

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**From:** Amy Rusko <[arusko@arlingtonwa.gov](mailto:arusko@arlingtonwa.gov)>

**Sent:** Friday, March 7, 2025 3:26 PM

**To:** Alex VanDuine <[avanduin@lwsd.wednet.edu](mailto:avanduin@lwsd.wednet.edu)>; Andrea Pellham <[apellham@snohd.org](mailto:apellham@snohd.org)>;  
Antonia Weiss <[antonia.weiss@co.snohomish.wa.us](mailto:antonia.weiss@co.snohomish.wa.us)>; Bob Hubenthal  
<[Robert.hubenthal@dshs.wa.gov](mailto:Robert.hubenthal@dshs.wa.gov)>; Brad Ball <[brad.ball@co.snohomish.wa.us](mailto:brad.ball@co.snohomish.wa.us)>; Brad Zahnow  
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of Fish and Wildlife <[R4Cplanning@dfw.wa.gov](mailto:R4Cplanning@dfw.wa.gov)>; DOC Review Team  
<[reviewteam@commerce.wa.gov](mailto:reviewteam@commerce.wa.gov)>; EFSEC <[efsec@utc.wa.gov](mailto:efsec@utc.wa.gov)>; Eric Heinitz  
<[efheinitz@doc1.wa.gov](mailto:efheinitz@doc1.wa.gov)>; Erika Harris <[eharris@psrc.org](mailto:eharris@psrc.org)>; Erin Kelly <[erin.kelly@bnsf.com](mailto:erin.kelly@bnsf.com)>; Haylie  
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<[Kelly.Cooper@DOH.WA.GOV](mailto:Kelly.Cooper@DOH.WA.GOV)>; Kelly McLain <[kmclain@agr.wa.gov](mailto:kmclain@agr.wa.gov)>; Kerry Lyste  
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<[randy.kline@parks.wa.gov](mailto:randy.kline@parks.wa.gov)>; Sam Barr <[sbarr@stillaguamish.com](mailto:sbarr@stillaguamish.com)>; SEPA Center  
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SEPA Review Team <[sepa.reviewteam@doh.wa.gov](mailto:sepa.reviewteam@doh.wa.gov)>; Snohomish County Public Works <[SPW-ExternalRFR@snoco.org](mailto:SPW-ExternalRFR@snoco.org)>;  
Snohomish County PUD <[cmmurphy@snopud.com](mailto:cmmurphy@snopud.com)>; Stacey Abbott  
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Rice <[srice@snohd.org](mailto:srice@snohd.org)>; Stillaguamish Tribe <[sepa@stillaguamish.com](mailto:sepa@stillaguamish.com)>; Stillaguamish Tribe of  
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Management <[eniguidula@wm.com](mailto:eniguidula@wm.com)>; Wayne Wendell <[wayne.wendell@ziply.com](mailto:wayne.wendell@ziply.com)>; WSDOT  
Aviation Land Use Inquiries and Application Submittals <[AviationLandUse@WSDOT.WA.GOV](mailto:AviationLandUse@WSDOT.WA.GOV)>

**Subject:** [EXTERNAL] City of Arlington - Snohomish County PUD Battery Energy Storage - Public Notice

**WARNING:** This email originated from outside of WSDOT. Please use caution with links and attachments.

Dear SEPA Review Agencies –

The City of Arlington has issued a Notice of Application, Notice of Neighborhood Meeting, and Mitigated SEPA Threshold Determination (MDNS) for Snohomish County PUD Battery Energy Storage System, project number PLN #1311.

Project documents can be viewed and reviewed under the project name on the City of Arlington's website at the below link.

[Public Notices / Public Hearings | Arlington, WA](#)

The City invites affected agencies, tribes, and special districts to review the attached documents for potential environmental impacts and provide the City Staff Contact with any comments by the close of the comment period as indicated on the SEPA Threshold Determination. Agency comments are to be submitted to the City Staff Contact via email or through the postal service. Regardless of the method, the City asks that SEPA comments be provided on their respective agency's formal letterhead.

Once received, comments will be made part of the official record on file with the City. After the close of the comment period, the City will review all comments received, and may, at its discretion, modify, or add conditions to mitigate for newly identified environmental impacts. Please note that the City will only accept *written* SEPA comments. Following City review, all SEPA comments received within the comment period will be forwarded directly to the project applicant.

Comments received (or post-marked, if mailed) outside of the comment period will not be considered or made part of the record.

The due date for this review is 5:00 pm on March 21, 2025.

Sincerely,

Amy Rusko



Amy Rusko, AICP, CNU-A  
Deputy Director  
Community & Economic Development  
Phone: 360-403-3550  
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