



DATE: Thursday, September 4, 2025
RE: UUP 25-0104 Telecommunications Tower
LOCATION: Parcel No. 0630-0011-1900, 1700 W Block of 18th Street
APPLICANT: Atlas Tower 1, LLC, 2500 30th Street, Boulder, CO 80301
OWNER: Port of Port Angeles, 202 North Cedar Street, Port Angeles WA, 98362
PLANNER: Ben Braudrick, AICP, Planning Supervisor

EXHIBIT 1: STAFF REPORT

I. SUMMARY

An application on behalf of Atlas Tower 1, LLC by Parker Bingham for an Unclassified Use Permit to construct a 120-foot telecommunication tower, associated equipment, and service access.

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II. PROPOSAL

The purpose of this request is to build a 120’ Monopole telecommunications tower within a (50 feet by 50 feet, measuring 2500 sq. feet.) wireless facility. This facility will provide critical wireless coverage to the surrounding area. The proposed site is located where coverage is lacking, and the capacity of the existing infrastructure is reaching its limit. As the area develops further, and the existing users demand more data for their existing devices, existing infrastructure will reach capacity limits and be unable to meet coverage needs. This tower and facility will be used for structural support of up to four wireless providers. Each provider will install antennas and on-the-ground base-station equipment.

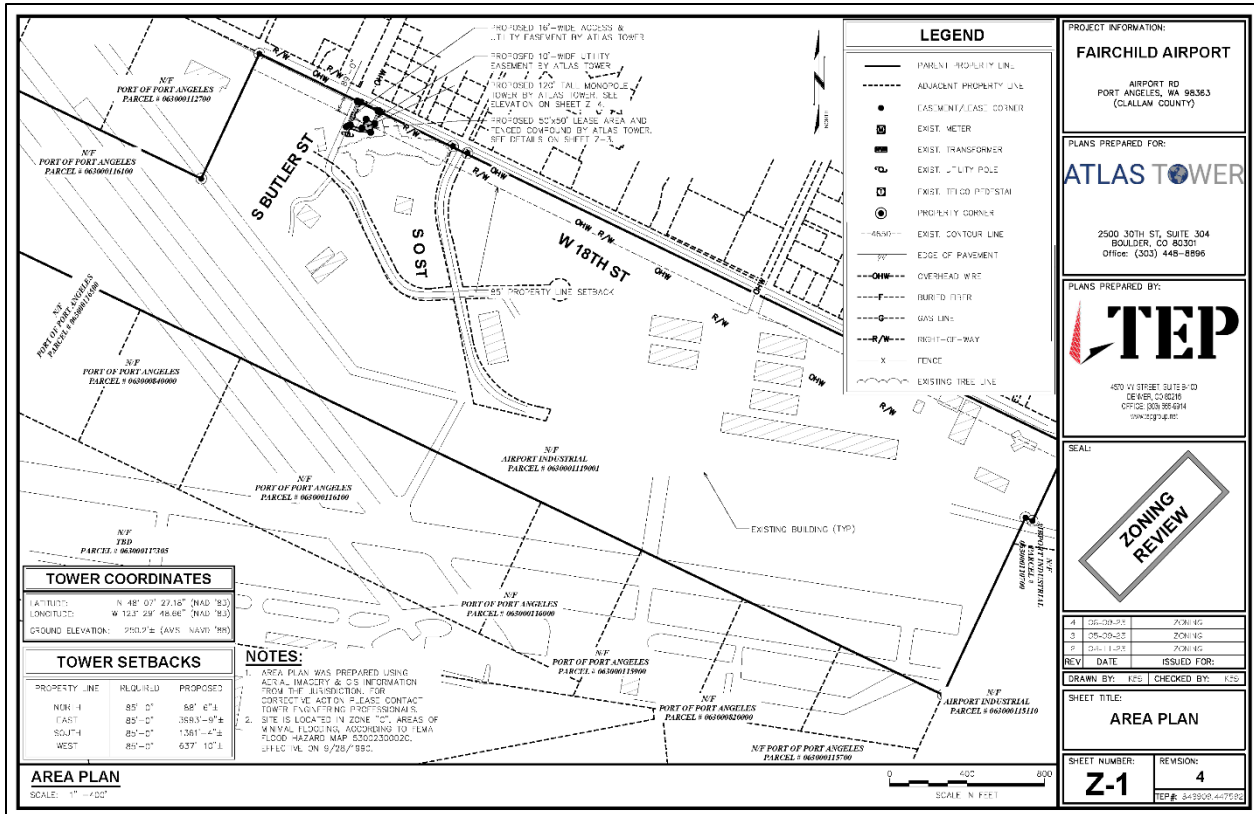


Figure 1: General location of proposed tower on the existing property. For the full preliminary plan set see Exhibit 2.

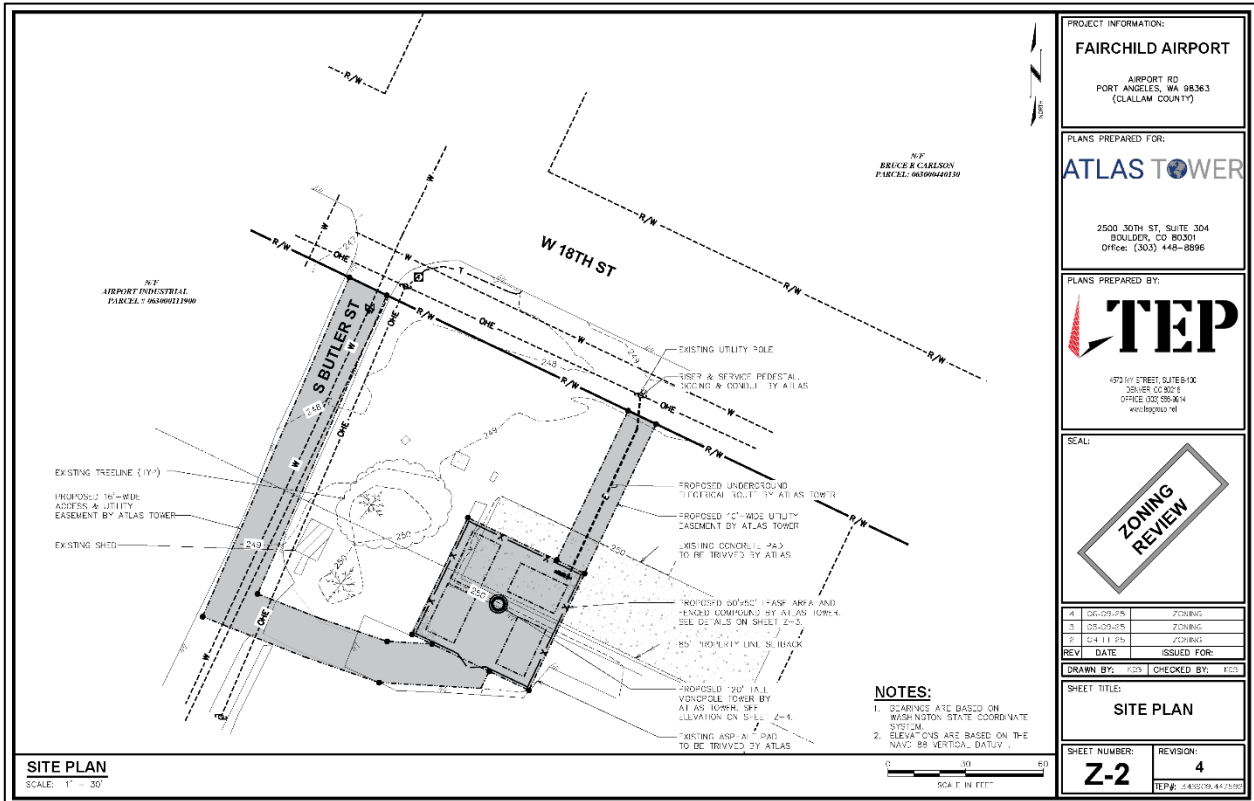


Figure 2: Site plan for proposed tower. For the full preliminary plan set see Exhibit 2.

III. FACTS RELAVENT TO THE APPLICATION

Property Description: A Portion of Suburban Lots 119-126 & 141-150 in the Townsite of Port Angeles & Vacated Streets Abutting

Address: Previous Address 2602 ½ West 18th Street

Property ID / Tax Parcel ID: 61107 / 0630-0011-1900

Zoning: IL, Industrial Light

Comprehensive Plan Future Land Use Designation:

Industrial

Dimensions: Irregular

Area: 7,491,814 sf, approximately 172 acres

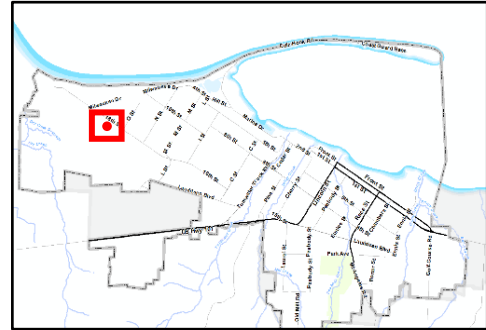


Figure 3: General location of the proposal

IV. PROCEDURE

On July 1, 2025, the applicant submitted an UUP application for the construction of a 120-foot telecommunication tower, associated equipment, and service access. A preapplication meeting (PAR 25-0020) was held on April 29, 2025. The preapplication response is attached to this report as Exhibit 4. Staff accepted the original neighborhood meeting due to the proposals near congruency to the original PRD proposal. The preapplication letter and original neighborhood meeting attendance are listed as Exhibit 9. The submitted UUP application was determined to be complete on July 1, 2025. On July 18, 2025, City Staff submitted a request for revisions and more information. On July 21, 2025, the applicant resubmitted the requested materials for staff review. Port Angeles Municipal Code requires the application be considered by the Hearing Examiner in a public hearing. Noticing materials are listed as Exhibit 5.

Notice of the application and public hearing were provided on the following dates and in the following manner:

1. August 1, 2025: Subject property, Posted sign | City Hall, Notice board |
2. August 2, 2025: Peninsula Daily News, Circulation | Property owners within 300' of subject property, Mailing

The Hearing Examiner will conduct a review of the Application and this staff report and make a decision on the permit within 170 days of the completeness determination. An appeal must be submitted to the City of Port Angeles within 21 days of the notice of final decision.

V. COMMENTS

Public Comment:

See Exhibit 5, Public Comment Memo

City of Port Angeles Departmental Comments:

Comments received from City of Port Angeles Departments have been incorporated into this report's findings and conditions.

VI. FINDINGS OF FACT & STAFF ANALYSIS

Analysis and findings of fact from Department of Community and Economic Development (DCED) staff are based on the application materials, Port Angeles Municipal Code (PAMC), standards, plans, public comment, and other relevant materials available during the review period. The findings and analysis section this report is a summary of the completed review by DCED staff.

City of Port Angeles Comprehensive Plan

All UUP applications must be consistent with the Port Angeles Comprehensive Plan. The following Port Angeles Comprehensive Plan policies are identified by Planning Staff to support the proposal in UUP Application No. 25-0104:

Land Use Element:

Goal G-3L: To provide and incentivize opportunities for industrial development in a manner, which efficiently uses the community's natural resources and physical environment, has minimal impact on the natural environment, contributes to quality of life, and is compatible with the desired development patterns.

Policy 3L.01: Ensure provision of urban services to all industrial areas, as required by the Capital Facilities Element concurrency policy.

Utilities and Public Services Element:

Goal G-5D: To provide utility services in an efficient and cost-effective manner.

Policy 5D-03: Provide urban services only in areas that are logical extensions of areas, which are currently served by such services or needed to implement a specific goal or policy of the Comprehensive Plan.

Staff Analysis: The proposed tower will extend greater availability of telecommunications services to western Port Angeles. This service provides a logical extension of services that have been demonstrated by the applicant's RF coverage map to be severely lacking in the general area. Currently, coverage is spotty and unreliable. The proposed tower drastically improving the coverage area and reliability. As an essential urban service, this telecommunication expansion will benefit a large number of residents, businesses, and travelers in Port Angeles. The proposal has the capacity for structural support of up to four wireless providers.

Port Angeles Municipal Code

The following PAMC provisions are seen as relevant to this application. Planning Staff provides comments under each provision as demonstration of the analysis that has occurred with the application review process and the findings of fact relevant to the application.

Title 18 – Administration and Personnel

Per PAMC Section 18.02.050, the Hearing Examiner has the review authority and is authorized and directed to hear and decide on Type III permit applications.

Staff Analysis: The permit requires a public hearing before the Hearing Examiner, whose decision is based upon the application materials, public comments, Port Angeles Municipal Code, Urban Service Standards and Guidelines, and information available during the application process. Such decision may be appealed to the Superior Court, provided that the appeal is filed within 21 days of the Examiner's decision per Chapter 36.70C RCW. If an appeal is not filed within the applicable period, the decision of the Hearing Examiner is the final decision of the City. A timely appeal for any decision of the Hearing Examiner will stay all further proceedings by the Department of Community and Economic Development specific to the property under appeal.

Title 17 - Zoning:

17.52.025 Development of towers.

- A. Towers may be located in any zone with approval of an unclassified use permit (UUP). Co-location shall be given first priority and may be required. The use of public properties shall be subject to approval by the City and the City's determination that the public's intended use of the site will not be unreasonably hindered. Application for an unclassified use permit shall be made to the Department of Community and Economic Development in the manner provided in this chapter. An application to locate a new tower shall be accompanied by technical information identifying and documenting the need for such a location per subsection 17.52.025.C PAMC.
- B. Towers may not exceed the maximum height allowed for structures in any residential zone unless a modification has been approved per section 17.52.085 PAMC. Towers shall be permitted to a height of 60 feet in commercial zones except in the Central Business District zone where the maximum height allowed shall be 45 feet. In industrial, public buildings and parks, and forest lands zones, towers shall be permitted to a height of 60 feet, and towers may be permitted in excess of 60 feet to a height of 120 feet in accordance with a modification approved per section 17.52.085 PAMC.

Staff Analysis: The proposed site is 2,500 sf in area, not including a 16-foot-wide access and utility easement on a property is that is currently zoned IL, Industrial Light. The proposed height of the tower is 120 feet. As proposed these requirements have been met.

17.52.030 Setbacks.

- A. Setback requirements for towers shall be measured from the base of the tower to the property line of the parcel of land on which it is located.

- B. Setback requirements may be modified, as provided in section 17.52.085 PAMC, when placement of a tower in a location which will reduce the visual impact can be accomplished. For example, adjacent to trees, which may visually hide the tower.
- C. Unless exempt from section 17.52.020 PAMC, telecommunications facilities shall be setback at least 25 feet from each lot line. The Community and Economic Development Director may grant a waiver of up to 25 percent of the setback requirement if it is determined that significant trees and other vegetation will be retained by reducing the setback.
- D. Towers in excess of 60 feet in height shall be set back one additional foot per each foot of tower height in excess of 60 feet.

Staff Analysis: The base of the proposed tower is located 85.5 feet from the front property line. The required front setback in the IL zone is 25 feet. As a 120-foot-tall tower, the setback required is 85 feet. As proposed, this tower meets setback requirements.

17.52.035 Structural requirements.

It shall be a condition of the unclassified use permit (UUP) that all towers must be designed and certified by an engineer to be structurally sound and, at a minimum, in conformance with the Building Code and any other standards set forth in this chapter. All towers shall be fixed to land.

Staff Analysis: A condition has been placed on this permit to ensure this requirement is met.

17.52.040 Separation or buffer requirements.

For the purpose of this section, the separation distances between towers shall be measured by drawing or following a straight line between the base of the existing or approved structure and the proposed base, pursuant to a site plan of the proposed tower. The minimum tower separation distances from residentially zoned land and from other towers shall be calculated and applied irrespective of City jurisdictional boundaries.

- A. Proposed towers must meet the following minimum separation requirements from existing towers or towers which have a development permit but are not yet constructed at the time a development permit is granted pursuant to the Zoning Code:
 - 1. Monopole tower structures shall be separated from other telecommunications towers by a minimum of 750 feet.
 - 2. Self-supporting lattice or guyed tower structures shall be separated from other telecommunications towers by a minimum of 1,500 feet.
- B. Tower separation distances from any property that is zoned residential shall be set back one foot for each foot of tower height.
- C. Separation or buffer requirements may be modified as provided in section 17.52.085 PAMC.

Staff Analysis: The applicant has demonstrated compliance with this requirement through the application narrative, radio frequency coverage maps, and preliminary plans.

17.52.050 Illumination.

Towers shall not be artificially lighted except as specified by the Federal Aviation Administration (FAA). Upon commencement of construction of a tower, in cases where there are residential uses located within a distance from the tower which is three times the height of the tower from the tower and when required by federal law, dual mode lighting shall be requested from the FAA.

Staff Analysis: NEPA review is currently underway due to the location of the proposed tower at Fairchild Airport. The NEPA determination may require further conditions to ensure compliance with this requirement. If necessary, illumination will be conditioned at the time of building permit issuance.

17.52.055 Exterior finish.

Towers not requiring FAA painting or marking shall have an exterior finish which enhances compatibility with adjacent land uses, as approved by the Hearing Examiner.

Staff Analysis: NEPA review is currently underway due to the location of the proposed tower at Fairchild Airport. Due to the adjacency of the tower to residentially zoned properties, staff is suggesting through condition the tower stealth design and be camouflaged. The NEPA determination may require further conditions to ensure compatibility.

17.52.060 Landscaping/stealth design.

All landscaping on a parcel of land containing towers, antenna support structures, or telecommunications facilities shall be in accordance with the applicable landscaping requirements in the zoning district where the tower, antenna support structure, or telecommunications facilities are located. The City may require on-site landscaping in excess of the requirements in the Zoning Code in order to enhance compatibility with adjacent land uses. Tower development shall preserve the pre-existing character of the site as much as possible. Towers and accessory equipment structures (equipment shelters and cabinets) shall be integrated through location, design, and color to blend in with the existing site characteristics to the extent practical. Existing vegetation around the facility shall be preserved to the extent possible or improved upon to provide vegetative screening.

The perimeter of a wireless communication support structure and any guyed wires/anchors shall be enclosed by a fence or wall at least six feet in height. Evergreen trees shall be planted surrounding the support structure in a manner approved by the Community and Economic Development Director. In the RS-7 and RS-9 Zones, the monopole or lattice tower must be screened by existing vegetation when possible. Additional screening may be required to mitigate

visual impacts to adjacent properties or public rights-of-way as determined by site-specific conditions.

Staff Analysis: Sheet Z-7 of the demonstrates compliance with the landscape screening surrounding the equipment and tower. No plans have been provided to remove existing vegetation that could act as screening. Due to the proposals adjacency to residentially zoned property and uses, staff is suggesting through condition the use of stealth design to camouflage the pole itself.

Environmental Review

This project is currently under review with the National Environmental Policy Act (NEPA). A NEPA determination is expected after the public hearing for the application. An adoption of the NEPA determination is expected to fulfill the required Washington State SEPA process. The permit is conditioned to require all NEPA and SEPA approvals and appeal periods to have expired prior to the issuance of a building permit for the proposal. Any conditions associated with the environmental determinations will be placed on the building permit.

Consistency

In preparation and submission of the Unclassified Use application, the applicant has demonstrated that all standards can be met in accordance with the City's Comprehensive Plan and the Port Angeles Municipal Code. Conditions placed on the permit in Section VII of this report ensure those standards will be demonstrated in a future final subdivision plat.

Recommendation

It is the recommendation of Department of Community and Economic Development Staff that the Hearing Examiner approve Application No. 25-0104 with the conclusions and conditions in Section VII of this staff report below. This recommendation is based on staff review of the application materials, Port Angeles Comprehensive Plan, Port Angeles Municipal Code standards, Urban Service Standards and Guidelines, and submitted comments.

VII. DECISION, CONCLUSIONS, & CONDITIONS

Having reviewed and considered the staff report, application materials, public comment, and all the information presented, the City Planning Division recommends **approval, with conditions**, Application No. 25-0104 for an Unclassified Use Permit and makes the following conclusions:

1. Analysis and findings of fact from Staff are based on the entirety of the application materials, municipal code, City standards, plans, public comment, and all other materials available during the review period. Collectively the information contained in the staff report is the record of the review. The analysis and findings section of this report is a summary of the complete City Staff review and the specific findings of fact.

2. Per Section 2.18.060 of the Port Angeles Municipal Code (PAMC), the Hearing Examiner has the review authority and is authorized and directed to hear and decide on general Infill Overlay Zone and Subdivisions. As to all of the foregoing issues and matters, the decision of the Hearing Examiner shall be the final decision of the City. Such decision may be appealed to the Superior Court, provided that the appeal must be filed with the City within 21 days after the Director issues the decision. An appeal application for any decision of the Director shall stay all further proceedings by the Department of Community and Economic Development specific to the property under appeal.
3. The proposed activity has been reviewed for compliance with the City's zoning, Comprehensive Plan regulations and has been found to be compliance with these land development regulations.
4. As conditioned, the proposed activity will not result in any adverse impacts to surround uses. The activity is therefore in compliance with the City's Wireless Telecommunication Towers and Facilities Chapter 17.52.
5. The proposal will result in minimal land disturbance and will therefore not require a cultural review of the intended activity.
6. The activity is not exempt from those activities listed in Section 17.52.020 PAMC, specifically Section 17.52.020(C) PAMC, and was therefore processed as an unclassified use permit per Section 17.96.050 PAMC.

Recommended Conditions of Approval

After a thorough staff analysis of the Unclassified Use Application No. 25-0104, it has been identified that all standards will be met in accordance with the Port Angeles Municipal Code. The following **four conditions** are recommended to be placed on the permit to ensure those standards will be maintained for the life of the permit:

1. Upon submission of a building permit, development will remain in substantial compliance with the plans included in the application for Unclassified Use Permit 25-0104.
2. The proposed tower must be designed and certified by a licensed structural engineer to be structurally sound and, at a minimum, in conformance with the Building Code.
3. The applicant will ensure that all proposed vegetation will survive for two years. All proposed landscaping that does not survive during that period must be replaced.
4. If in conformance with FAA requirements, the tower should utilize stealth design techniques to camouflage the tower from surrounding uses.

VIII. EXHIBITS

Exhibit 2: Application Materials

Exhibit 3: Notice of Complete Application and Request for More Information

Exhibit 4: Preapplication Response

Exhibit 5: Public Comment Memo