



City of Puyallup

**Building Division**

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165

www.cityofpuyallup.org

# Comment Notice

## Permit Application # PRSMS20220789

The City has completed the review of the above-mentioned permit submittal. Below please find the permit submittal review comments from your review team. Should you have any questions regarding the review comments, please contact the plan reviewer associated with the comment listed below.

**Planning Review** (Reviewed By: Chris Beale, (253)841-5418, CBeale@PuyallupWA.gov)

♦ Provide documentation (a letter) proving the application meets PMC 20.59.050 (7), (9) and (10). The letter shall itemize point by point your proposed compliance with PMC.

Application will be denied per PMC 20.59.050 (4)(C) if you cannot meet code or if you do not respond with the following information. DPS staff reasonable efforts to issue the small cell permit in a time period that adheres to the presumptively reasonable periods of time set by the FCC and also consistent with any conflicting provisions of state or federal law, and the preservation of the city's health, safety and aesthetic environment.

(7) Small Cell Facilities Attached to Light Poles and Other Nonwooden Poles. Small cell facilities attached to existing or replacement nonwooden light poles and other nonwooden poles in the right-of-way or poles outside of the right-of-way shall conform to the following design criteria:

(a) Antennas and the associated equipment enclosures shall be fully concealed within the pole, unless such concealment is otherwise technically infeasible or is incompatible with the pole design; then the antennas and associated equipment enclosures must be camouflaged to appear as an integral part of the pole or flush-mounted (no more than six inches off the pole) to the pole in a manner that integrates the equipment enclosure into the design of the pole and minimizes clutter and visual impact. If the equipment enclosure is permitted on the exterior of the pole, the applicant is encouraged to place the equipment enclosure behind any road signs that may be on the pole; provided, that such location does not interfere with the visibility of the signs or the operation of the small cell facility. For purposes of this section, "incompatible with the pole design" may include a demonstration by the applicant that the visual impact to the pole or the streetscape would be reduced by placing the antennas and equipment exterior to the pole.

(b) All conduit, cables, wires and fiber must be routed internally in the light pole. Full concealment of all conduit, cables, wires and fiber is required within mounting brackets, shrouds, canisters or sleeves if attaching to exterior antennas or equipment.

(c) Any replacement pole shall substantially conform to the design of the pole it is replacing or the neighboring pole design standards utilized within the contiguous right-of-way.

(d) The height of any replacement pole may not extend more than 10 feet above the height of the existing pole.

(e) The diameter of a replacement pole shall comply with the city's setback and sidewalk clearance requirements, shall not be more than a 25 percent increase in the diameter of the existing pole measured at the base of the pole, and shall comply with the requirements in subsection (9)(e) of this section.



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(i) If additional diameter is needed in order to conceal equipment or conduit within the base of the pole, then the applicant shall propose a concealment element design consistent with subsection (10)(c) of this section.

(f) An antenna on top of an existing pole may not extend more than six feet above the height of the existing pole and the diameter may not exceed the diameter of the pole by more than 12 inches, measured at the top of the pole, unless the applicant can demonstrate that more space is needed. The antenna shall be integrated into the pole design so that it appears as a continuation of the original pole, including colored or painted to match the pole, and shall be shrouded or screened to blend with the pole, except for canister antennas which shall not require screening. All cabling and mounting hardware/brackets from the bottom of the antenna to the top of the pole shall be fully concealed and integrated with the pole.

(g) Any equipment or antenna enclosures must meet WSDOT height clearance requirements.

(h) The use of the light pole for the siting of a small cell facility shall be considered secondary to the primary function of the light pole. If the primary function of a light pole serving as the host site for a small cell facility becomes unnecessary, the light pole shall not be retained for the sole purpose of accommodating the small cell facility and the small cell facility and all associated equipment shall be removed.

(9) General Requirements.

(a) Ground-mounted equipment in the rights-of-way is prohibited, unless such facilities are placed underground or the applicant can demonstrate that pole-mounted or undergrounded equipment is technically infeasible. If the applicant builds an underground vault it should design such vault to allow for co-location of additional equipment. If ground-mounted equipment is necessary, then the applicant shall submit a concealment element design, as described in subsection (10)(c) of this section. Generators located in the rights-of-way are prohibited.

(b) No equipment shall be operated so as to produce noise in violation of Chapter 6.16 PMC (Noise Control).

(c) Small cell facilities are not permitted on traffic signal poles.

(d) Small cell facilities are not permitted on ornamental poles, which are described in the City Standards for Public Works Engineering and Construction Manual.

(e) Replacement poles and new poles shall comply with the Americans with Disabilities Act (ADA), city construction and sidewalk clearance standards, and state and federal regulations in order to provide a clear and safe passage within the rights-of-way.

(f) Replacement poles shall be located as near as possible to the existing pole with the requirement to remove the abandoned pole.

(g) The design approved in a small cell permit shall be considered concealment elements and such facilities may only be expanded upon an eligible facilities request described in this chapter when the modification does not defeat the concealment elements of the small cell facility.

(h) No signage, message or identification other than the manufacturer's identification or identification required by governing law is allowed to be portrayed on any antenna, and any such signage on equipment enclosures



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shall be of the minimum amount possible to achieve the intended purpose; provided, that signs are permitted as concealment element techniques where appropriate.

(i) Antennas and related equipment shall not be illuminated except for security reasons, required by a federal or state authority, or unless approved as part of a concealment element design, as described in subsection (10)(c) of this section.

(j) Side arm mounts for equipment enclosures are prohibited. Further, antennas placed on side arm mounts must comply with the requirements in subsection (6)(f) of this section, and may not be placed on any preexisting side arm mount that extends over the vehicular portion of the rights-of-way.

(k) Any small cell facility shall be removed by the facility owner or authorized agent within six months of the date it ceases to be operational or if the facility falls into disrepair. "Disrepair," as used in this section, refers to a facility or structure which has become so damaged or deteriorated on account of age, the elements, wear and tear, or other cause that it has become a threat to public safety or would constitute a public nuisance as defined in the Puyallup Municipal Code.

(l) The preferred location of a small cell facility on a pole is the location with the least visible impact.

(m) Antennas, equipment enclosures, and ancillary equipment, conduit and cable shall not dominate the building or pole upon which they are attached.

(n) The city may consider the cumulative visual effects of small cells mounted on poles within the rights-of-way when assessing proposed siting locations so as to not adversely affect the visual character of the city.

(o) Small cell facilities are not permitted on any property containing a residential use in the RS zone.

(p) Small cell facilities may not encroach onto or over private property or property outside of the right-of-way without the property owner's express written consent.

(q) The design standards in this section are intended to be used solely for the purpose of concealment and siting. Nothing herein shall be interpreted or applied in a manner which dictates the use of a particular technology, nor prohibits or has the effect of prohibiting the provision of personal wireless services.

(10) New Poles in the Rights-of-Way for Small Cell Facilities.

(a) New poles within the rights-of-way are only permitted if the applicant can establish that:

(i) The proposed small cell facility cannot be located on an existing utility pole or light pole, electrical transmission tower or on a site outside of the public rights-of-way such as a public park, public property, building, transmission tower or in or on a nonresidential use in a residential zone whether by roof or panel mount or separate structure;

(ii) The proposed small cell facility complies with the general design requirements in subsection (9) of this section;

(iii) The proposed small cell facility receives approval for a concealment element design, as described in



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subsection (10)(c) of this section;

(iv) The proposed small cell facility also complies with shoreline and SEPA, if applicable; and

(v) No new poles shall be located in a critical area or associated buffer required by the city's environmentally critical areas management ordinance (Chapter 21.06 PMC), except when determined to be exempt pursuant to Article IV of said ordinance.

(b) An application for a new pole in the right-of-way is subject to administrative conditional use permit review pursuant to Chapter 20.81 PMC.

(c) The concealment element design shall include the design of the screening, fencing or other concealment technology for a tower, pole, or equipment structure, and all related transmission equipment or facilities associated with the proposed wireless communications facility, including but not limited to fiber and power connections.

(i) The concealment element design should seek to minimize the visual obtrusiveness of wireless communications facility installations. The proposed pole or structure should have similar designs to existing neighboring poles in the rights-of-way, including, to the extent technically feasible, similar height. Other concealment methods include, but are not limited to, integrating the installation with architectural features or building design components, utilization of coverings or concealment devices of similar material, color and texture - or the appearance thereof - as the surface against which the installation will be seen or on which it will be installed, landscape design, or other camouflage strategies appropriate for the type of installation. Applicants are required to utilize designs in which all conduit and wirelines are installed internally in the structure or otherwise integrated into the design of the structure. Further, applicant designs should, to the extent technically possible, comply with the generally applicable design standards adopted pursuant to subsection (7) of this section.

(ii) If the director has already approved a concealment element design, either for the applicant or another wireless communications facility along the same public right-of-way or for the same pole type, then the applicant shall utilize a substantially similar concealment element design, unless it can show that such concealment element design is not physically or technically feasible, or that such deployment would overwhelm the pole design.

(d) Even if an alternative location is established pursuant to subsection (10)(a)(i) of this section, the director may determine, pursuant to an administrative conditional use permit, that a new pole in the right-of-way is in fact a superior alternative based on the impact to the city, the concealment element design, the city's comprehensive plan and the added benefits to the community.

(e) Prior to the issuance of a permit to construct a new pole or ground-mounted equipment in the right-of-way, the applicant must obtain a site-specific agreement from the city to locate such new pole or ground-mounted equipment. This requirement also applies to replacement poles when the replacement is necessary for the installation or attachment of small cell facilities, the replacement structure is higher than the replaced structure, and the overall height of the replacement structure and the small cell facility is more than 60 feet.



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When you are ready to resubmit, you can do so by using the customer portal and uploading a “new version” of the submittal requirement. In addition, you will need to pay your resubmittal fee at the time of resubmittal.

Your resubmittal will not be processed until the fee has been paid.

To resubmit, you must address all comments and complete the [resubmittal form](#). Please note, partial resubmittals will be deemed incomplete and returned.

If you need assistance with resubmitting your corrections, please contact the Permit Center.

Sincerely,

City of Puyallup Permit Center

(253) 864-4165 option 1

[permitcenter@puyallupwa.gov](mailto:permitcenter@puyallupwa.gov)