COUNTY OF HUMBOLDT

For the meeting of: 11/5/2026

File #: 26-1136

To: Planning Commission

From: Planning and Building Department

Agenda Section: Public Hearing

SUBJECT:
New Cingular Wireless PCS, LLC (AT&T Mobility) Conditional Use Permit, Coastal Development Permit, and Special Permit
Record No.: PLN-2025-19320
APN: 511-042-004-000
McKinleyville area

A Conditional Use Permit (CUP) is requested to authorize the erection and operation of an 89-foot tall, unmanned wireless telecommunications facility. The structure would be located within an approximately 414 square-foot fenced lease area and will be capable of hosting equipment for one other wireless carrier. Stealthing is included to help disguise the facility and obscure the visibility of antennas and other equipment by making the structure look like an evergreen tree complete with faux branches on its "trunk". The applicant plans to install a variety of equipment on the tower, including 12 AT&T Antennas, RRUs, cabling and fiber, as well as an equipment shelter and a 30kW generator. The parcel is currently developed with two residences and accessory structures. The parcel is located within the Coastal Zone; therefore, a Coastal Development Permit (CDP) is also required. A Special Permit is required to exceed the height limit.

RECOMMENDATION(S):
That the Planning Commission:

1. Adopt the resolution, (Attachment 1) which does the following:

   a. Finds the Planning Commission has determined that the project is exempt from environmental review pursuant to Section 15303(c) of the State CEQA Guidelines, and as a Responsible Agency, agrees with the lead agency's findings; and

   b. Makes all of the required findings for approval of the Conditional Use Permit, Coastal Development Permit and Special Permit; and

c. Approves the New Cingular Wireless PCS, LLC Conditional Use Permit, Coastal Development Permit and Special Permit subject to the conditions of approval (Attachment 1A).

DISCUSSION:

Project Location: The project site is located in the McKinleyville area, on the west side of Lily Avenue, approximately 300 feet north of the intersection of Lily Avenue and Meyers Road, on the property known as 3386 Lily Avenue.

Present General Plan Land Use Designation: RL - Residential Low Density; McKinleyville Community Plan; Slope Stability: Relatively Stable (0).

Present Zoning: RS-5/AP-N - Residential Suburban with combining zone overlays Airport Safety Review (AP), Noise Impact (N).

Environmental Review: Project is exempt from CEQA review pursuant to Section 15303(c) - New Construction or Conversion of Small Structures. This project seeks to construct a 89-foot tall wireless tower and related ground-based equipment compound within a 414 square-foot fenced lease area.

State Appeal: The project Is located within the Coastal Zone and is appealable to the California Coastal Commission.

Major Issues: None.

Executive Summary: On September 3, 2026, a Conditional Use Permit for an 89-foot tall, monopole wireless telecommunications tower was presented to the Planning Commission on APN 511-042-004-000. After discussion, the Planning Commission requested that Planning Department review the alternative site on APN 511-011-025 (3248 Letz Avenue) known as Slagle Field. Per the Alternate Site Analysis (Attachment 2B) the location meets the coverage objective required by the Applicant and the landowner is willing to lease a defined area within the vacant parcel for a proposed tower. The alternative site parcel is zoned Commercial Recreation (CR) and is in the Appeal Jurisdiction of the Coastal Zone. Additionally, as requested by the planning Commission, staff reached out to the California Coastal Commission and obtained comments on the alternative site, which are included in Attachment 3C.

A review of the alternative site parcel found that the proposed site location would be outside of the 100-year flood zone of Norton Creek. The property is relatively stable, not subject to potential liquefaction and is outside of the Alquist Priolo Fault Hazard Zone. The alternative site property is within an area of moderate fire hazard severity and within the Arcata Fire Protection District. A biological study has not been completed on the site; however, a review of the California Natural Diversity Database does not indicate the presence of rare or endangered flora or fauna on the parcel. It does show the potential for Lyngbye's sedge habitat. The larger McKinleyville area is also known to

have occurrences of Siskiyou checkerbloom The proposed tower site would be approximately 470 feet from the closest residence.

The proposed alternative tower location is located within an Airport Compatibility Zone 2, which is conditionally compatible for a telecommunications tower as is the preferred site location. However, the alternative site has not been evaluated for "Hazards to Air Navigation" by the Federal Aviation Administration nor has an Aeronautical Study been completed for this location. A height analysis has not been prepared for this location by the Applicant.

It is noted in the alternative site analysis that the location does not provide the same amount of potential screening of trees and foliage that the preferred site does as shown in Attachment 2H. The alternative site is directly adjacent to Hammond Trail and would be in full view of those utilizing the trail, as well as Highway 101. Humboldt County Code requires that new cellular towers be designed to protect views along the ocean and be visually compatible with the character of surrounding areas. After a review of the alternative location staff recommends approval of the preferred location on Lily Avenue.

The 89-foot tall Wireless Communications Facility at 3386 Lily Avenue would be located within an approximately 414 square foot fenced lease area designed to host the tower and related ground-based equipment. The tower site and lease area are proposed to be located approximately 200 feet north of Myers Road and 150 feet east of Highway 101 North.

Stealthing is included to help disguise the facility and obscure the visibility of antennas and other equipment by making the structure look like an evergreen tree complete with faux branches on its "trunk". AT&T plans to install a variety of equipment on the tower, including 12 AT&T Antennas, RRUs, cabling and fiber, as well as an equipment shelter and a 30kW generator. The proposed tower site and lease area will be accessible from a yet to be developed 40-foot drive with access from Lily Road. Approximately 180 feet of trenching will be required to extend power to the lease area from the nearest utility pole.

AT&T's existing cellular site is at the eastern intersection of Murray Road and Highway 101 North on the sign at the 76 gas station (APN 511-021-059). The lease at this site is expiring and the landowner will not renew it. This led to the issuance of a search ring produced by AT&T to replace the coverage that will be lost when the existing site is decommissioned. Based on a computerized engineering study, which considers, among other things, local population density, traffic patterns, and topography, AT&T determined the proposed location an appropriate and necessary location and height of proposed facility to maintain coverage along Highway 101 both north and south of Murray Road, McKinleyville High School to the east, and the surrounding residential and commercial areas.

As the operator (AT&T) needed to replace the coverage that would have been lost from the decommissioning of the original site on Murry Road and Hwy 101, several sites were reviewed as

possible replacements to maintain service for its customers and provide for the public safety of the community.

A “search ring” was developed radiating from the original site in order to determine viable options for a new tower. Several locations were examined to determine what sites could be utilized for the new tower. These locations are outlined in the AT&T Mobility Alternative Analysis report (Attachment 2B). The 100-foot all wireless tower that was recently approved under Conditional Use Permit PLN-2023-18298 at 1710 Norton Road was considered as a possible location for the AT&T facility and equipment. Network engineers performed coverage studies to evaluate whether an AT&T collocation on that tower site would sufficiently accomplish the coverage objective of the network. It was concluded that collocation site would leave a substantial portion of Hwy 101 without coverage.

It was determined that the site at 3386 Lily Road is the most appropriate location for a new Wireless Communications Facility. This parcel is best suited to meet the needs of the network as well as the intent of the Humboldt County Code.

The height limit of a structure is 35 feet for residentially zoned parcels over 20,000 square feet in size. The proposed tower would exceed the height limit by 54 feet and would be permissible with a Special Permit, normally conditioned upon proportional increases in the required yard. To ensure that RF signals extend beyond the “clutter” of nearby trees, buildings, hills, etc., antennas must be installed to a certain height. Per the applicant, the 89-foot antenna tip height is the minimum necessary to ensure that AT&T can meet its technical service objectives, including providing reliable coverage and enabling seamless signal handoff between neighboring AT&T-Mobile facilities. With trees in the immediate vicinity reaching between 72 and 76 feet tall, the tower would blend into the surrounding area and pose little visual concern. Moreover, per Humboldt County Code 313-91.2.5.1.2 “telecommunications towers located adjacent to a residential use shall be set back from the nearest residential lot line by a distance at least equal to its total height or fifty (50) feet, whichever is greater. The setback shall be measured from that part of the tower that is closest to the neighboring property (i.e., the setback for a faux tree would be measured from the end of the branch closest to the neighboring property). The nearest residential property line is approximately 215 feet from the tower site.

The faux-tree design of the proposed tower will help it blend in with the surrounding environment and nearby mature conifers which range from 72 to 76 feet tall. The exception can be authorized under the Use Permit, as provided for under the concurrent permitting provisions found in 312-3.3 of the zoning code.

The project site is located in the airport safety zone 2 and in the transitional protected airspace and Department of Aviation and Federal Aviation Administration (FAA). The FAA conducted an aeronautical study (attachment 2E) which revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation. The proposed facility complies with the Airport Land Use Compatibility Plan for the Humboldt County Airports Master Plan, and the proposed facility

is compatible with the adjacent Humboldt County airport. An Application for Variance was administratively approved by the Director of the Department of Aviation under Humboldt County Code 333-8B as the proposed cellular tower met FAA guidelines.

The communications facility is consistent with the County's Wireless Communications Ordinance, which became effective on June 11, 2026. It is compliant with all of the development standards of the ordinance because it adheres to all required setbacks (314.91.2.5.1), is not a hazard to flights due to height limitations (314.91.2.5.8), applies "Stealth Design" (314.91.2.3.22) that minimizes adverse aesthetic and visual impacts, and will have a dedicated backup power source (314.91.2.5.3) that adheres to noise restriction requirements (314.91.2.5.4).

A biological resources impact analysis was prepared by Environmental Assessment Specialists, Inc. on May 20, 2025, which documented that no native trees or shrubs were found to occur within the portion of the property targeted to be developed for the tower and lease area. The biologist determined that no portions of the area proposed for development footprint contain the necessary habitat suitability elements to support listed sensitive wildlife species. The area chosen was found to be previously disturbed by horse grazing and therefore determined not to contain the necessary habitat suitability elements to support listed sensitive wildlife species. A walk through was also conducted by California Department of Fish and Wildlife on September 2, 2025, found the site dominated with non-native grasses and forbs and no species of concern present. No further surveys were requested by the Department of Fish and Wildlife.

The project can be found categorically exempt from further CEQA review pursuant to the Class 3 exemption (15303(c) of the CEQA Guidelines) which covers small new facilities or structures including the construction of commercial buildings not exceeding 2,500 square feet.

OTHER AGENCY INVOLVEMENT:
The project was referred to responsible agencies and all responding agencies have either responded with no comment or recommended approval or conditional approval (Attachment 3).

RECOMMENDATIONS:
Based on a review of Planning Division reference sources and comments from all involved referral agencies, Planning staff concludes that the applicant has submitted evidence in support of making all of the required findings for approval of the Conditional Use Permit. Staff recommends that the Planning Commission find the project exempt from further environmental review pursuant to Section 15303(c) of the State CEQA Guidelines, as there is no substantial evidence that the project will have a significant effect on the environment.

ALTERNATIVES TO STAFF RECOMMENDATIONS:
The Planning Commission could elect to add or delete conditions of approval. The Planning Commission could deny the permit request if unable to make all of the required findings. Staff has

prepared Conditions of Approval for the project and concluded that with them the required findings in support of the proposal can be made. Consequently, staff does not recommend further consideration of these alternatives.

ATTACHMENTS:

1. Draft Resolution
   - A. Conditions of Approval
   - B. Project Location and Plan Set
2. Applicant's Evidence in Support of the Required Findings
   - A. Project Narrative
   - B. Coverage Objective & Justification and Analysis of Alternative Sites
   - C. Photo-simulations
   - D. Biological Report
   - E. Notice of Proposed Construction and Determination
   - F. Revised Height Determination Summary
   - G. Humboldt County Aviation Cellular Tower Variance (ACV)
   - H. Radio Frequency Report
   - I. Alternative Site (Letz Avenue) Photo-simulations
3. Referral Agency Comments and Recommendations
   - A. County Public Works Land Use Referral Response
   - B. County Department of Environmental Health Referral Response
   - C. California Coastal Commission Request for Comments Response
4. Public Comment

Applicant

New Cingular Wireless PCS, LLC
c/o Aaron De La O
750 W Center #301
West Bridgewater, MA 02379

Owner

Ford Logging Inc
c/o Brandie Ford
1225 Central Ave #11
McKinleyville, CA. 95519

Agent
Centerline Communications
c/o Aaron De La O
750 W Center #301
West Bridgewater, MA 02379

Please contact Michael Kein, Associate Planner, at MKein2@co.humboldt.ca.us or (707) 268-3739 if you have questions about this item.