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Development Review Committee  
1020 East Pioneer Road  
Draper, UT 84020

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**STAFF REPORT**  
November 17, 2025

**To:** Jennifer Jastremsky, Zoning Administrator

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Approved Date

**From:** Todd A. Draper, AICP, Planning Manager  
801-576-6335, [todd.draper@draperutah.gov](mailto:todd.draper@draperutah.gov)

**Re: AT&T 11400 S 700 E Upgrade – Permitted Use Permit Request**

Application No.: 2024-0299-USE  
Applicant: Jill Drake, representing the Smartlink Group, AT&T Mobility, and THD Draper LLC.  
Project Location: 656 E. 11400 S., Suite H  
Current Zoning: CN (Neighborhood Commercial)  
Acreage: 10 Acres (Approximately 435,600 ft<sup>2</sup>)  
Request: Request for approval of a Permitted Use Permit in the CN zone regarding equipment upgrades to an existing rooftop mounted AT&T wireless facility.

**SUMMARY AND BACKGROUND**

This application is a request for approval of a Permitted Use Permit for approximately 10 acres located south of 11400 South, and west of 700 East. at approximately 656 E. 11400 S., Suite H. (Exhibits B & C). The property is currently zoned CN. The applicant is requesting that a Permitted Use Permit be approved to allow for an equipment upgraded to the existing rooftop mounted wireless facility.

The property consists of a Harmons Grocery store on the south, an automotive fuel station and two multi-tenant retail buildings, one on the north east side of the property and another on the northwest corner of the property. The wireless facility is located on the rooftop of the northwest multi-tenant building. The initial AT&T wireless facility appears to have been added to the rooftop in 2008. Numerous upgrades to the AT&T equipment have



been approved over the years, most recently under files USE-000166-2022, and PUP-000334-2017.

## ANALYSIS

### General Plan and Zoning.

Table 1	General Plan and Zoning Designations	Exhibit
Existing Land Use	Community Commercial / Neighborhood Commercial	Exhibit D
Current Zoning	CN	Exhibit E
Proposed Use	Wireless Telecommunications Facility	
Adjacent Zoning		
East	CN, RA1 (Residential Agricultural)	
West	R3 (Residential Single-Family)	
North	R-1-8 (Residential Single-Family) Sandy City	
South	CN, RM1 (Residential Multiple-Family)	

The Community Commercial and Neighborhood Commercial land use designations are characterized as follows:

### *Community Commercial*

LAND USE DESCRIPTION	
<b>CHARACTERISTICS</b>	<ul style="list-style-type: none"> <li>Includes the full scope of commercial land uses that require and utilize exposure to the freeway</li> <li>Intended to be traveler-or commuter-oriented and should provide lodging, food, personal services and other similar uses</li> <li>Frontage roads</li> <li>Deeper setbacks for landscaping and enhancements</li> <li>Limited traffic access points</li> <li>Visual unity</li> <li>Uniform design standards and aesthetics</li> <li>Access to individual properties should be provided only from frontage roads</li> <li>Well landscaped street frontages</li> <li>Limited traffic access points for the site</li> <li>Common off-street traffic circulation and parking areas</li> <li>Pedestrian access from surrounding residential areas</li> </ul>
<b>LAND USE MIX</b>	<ul style="list-style-type: none"> <li>Large-scale, master-planned commercial centers</li> <li>Big-box stores and offices</li> </ul>
<b>COMPATIBLE ZONING</b>	<ul style="list-style-type: none"> <li>Community Commercial (CC)</li> <li>General Commercial (CG)</li> <li>Interchange Commercial (CI)</li> <li>Institutional Care (IC)</li> </ul>
<b>LOCATION</b>	<ul style="list-style-type: none"> <li>Strategically placed along high-traffic corridors with convenient points of traffic access to and from residential areas</li> </ul>

### Neighborhood Commercial

LAND USE DESCRIPTION	
<b>CHARACTERISTICS</b>	<ul style="list-style-type: none"> <li>• Small-scale commercial land uses that serve local residents in adjacent neighborhoods</li> <li>• Minimal impact in predominantly residential areas</li> <li>• Well-landscaped street frontages</li> <li>• Limited traffic access points and pedestrian access from surrounding residential areas</li> <li>• Don't overcrowd commercial lots; i.e., require adequate setback and landscape buffers</li> <li>• Screened parking and adequate ingress and egress to parking areas</li> <li>• Adequate drainage</li> <li>• Low noise standards</li> </ul>
<b>LAND USE MIX</b>	<ul style="list-style-type: none"> <li>• Small-scale commercial</li> <li>• Planned retail</li> <li>• Office</li> </ul>
<b>COMPATIBLE ZONING</b>	<ul style="list-style-type: none"> <li>• Neighborhood Commercial (CN)</li> <li>• Institutional Care (IC)</li> <li>• Commercial Services (CS)</li> </ul>
<b>LOCATION</b>	<ul style="list-style-type: none"> <li>• Adjacent to neighborhood</li> <li>• Along local roads</li> </ul>

According to Draper City Municipal Code (DCMC) Section 9-8-020 the purpose of the CN zone is to *"provide areas where convenience buying outlets, having small trade areas, may be established to serve surrounding residential neighborhoods. This zone is intended to promote a combination of retail and service facilities which, in character and scale, meet day to day needs of nearby residents."*

Site Plan Layout. The overall site plan in Exhibit F shows the roof of the building on which the existing ballast frame towers and antennas are currently installed. Two enlarged site plans are also provided that show the location of the existing towers and the proposed locations of the new ballast frame towers to be installed. Each of the new towers and antenna will be setback from the nearest edge of the parapet wall between nine-feet four-inches (9'-4") and ten-feet ten-inches (10'-10"). An additional layout plan for the associated equipment is also included with the elevation plans in Exhibit G. Three (3) new cabinets are shown as being added onto the equipment platform and two (2) existing cabinets are proposed to be removed. Two (2) new surge suppression units are also proposed to be added to the platform, one of which will extend beyond the edge of the platform approximately one-foot one-inch (1'-1").

**Table 2** Site Design Requirements

Standard	DCMC Requirements	Proposal	Notes
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Setbacks	A minimum of five feet (5') behind the parapet wall.	Alpha: 9'-4" Beta: 10'-5" Gamma: 10'-10"	
Height (when 10' or closer to exterior wall)	Maximum height of the antenna shall be directly proportional to the distance the antenna is set back from the wall up to a maximum of ten feet (10') as measured from the top of the parapet wall.	Alpha: 8'-6" (from top of parapet wall)	
Height (when further than 10' to exterior wall)	15' above the roofline (maximum)	Beta: 10'-4" Gamma: 10'-4"	

*Requested Modifications.* The elevation drawings and layout plans for the towers and antenna and are provided in Exhibit G. The proposed plans include the following changes:

**Rooftop Tower:**

- Remove (8) Antennas
- Remove (21) Remote Radio Heads (RRHS)
- Remove (3) Existing Ballast Frames
- Install (3) AIR 6419 B77D Antennas
- Install (3) AIR 6419 B77G Antennas
- Install (2) NNH4-65C-R6-V3 Antennas
- Install (12) Remote Radio Units (RRUs)
- Install (3) New Ballast Frames

**Ground/Equipment Platform:**

- Remove (1) Argus Power Plant
- Remove (3) Converters
- Remove (3) Rectifiers
- Remove (8) Batteries
- Remove (1) UMTS Cabinet
- Install (1) Emerson 512 -48V Outdoor Power Plant
- Install (11) Converters
- Install (12) Rectifiers
- Install (1) Vertiv Outdoor Battery Cabinet
- Install (24) 190AH Batteries in New Battery Cabinet



- Install (1) Generic E\\ BBU @ DRM
- Install (1) FLX 42 Cabinet
- Install (2) DC12 Surge Units

The existing ballast frames are being removed and new ballast frames are being installed in slightly altered locations to achieve the desired width and azimuth. The new antennas will be installed approximately eight-feet six-inches (8'-6") in height above the parapet wall, which is approximately ten-feet four-inches (10'-4") above the roof deck. The existing antenna arrays are approximately thirteen-feet (13') in width and the new arrays installed on the new ballast frames will be approximately fifteen-feet (15') in width. All proposed changes comply with the permitted use standards for Roof Mounted antennas found in DCMC subsection 9-41-050(C).

Lighting. No changes to the existing site lighting are proposed with this application.

Previous Conditions of Approval. The Zoning Administrator placed the following conditions of approval on the prior Permitted Use Permit on October 4, 2022:

1. That the proposed changes are compliant with Section 9-41-050(E) of the DCMC.
2. The applicant shall obtain all applicable permits from Draper City Fire and the Building Division for this upgrade.

Criteria For Approval. The criteria for review and potential approval of a permitted use request is found in Section 9-5-070(E) of the Draper City Municipal Code. This section depicts the standard of review for such requests as:

- E. Approval Standards: The following standards shall apply to the issuance of a permitted use permit. A permitted use shall:*
- 1. Be allowed as a permitted use in the applicable zone;*
  - 2. Conform to development standards of the applicable zone;*
  - 3. Conform to applicable regulations of general applicability and regulations for specific uses set forth in this title;*
  - 4. Not be located on any land classified as a primary or secondary conservation area or sensitive land area, except as expressly permitted by provisions of this title;*
  - 5. Not be located in any protected area as shown on a natural resource inventory; and*
  - 6. Conform to any other applicable requirements of this code.*

Staff notes that this particular application is not subject to an Eligible Facilities Request under Federal Section 6409 as the existing ballast frames (towers) are being removed and new ballast frames (towers) are proposed to be installed. Applications subject to an Eligible

Facilities Request are those where the requested modifications are being made to an existing tower regarding the installation, removal, or replacement of transmission equipment on that tower. The applicant's responses to the Permitted Use criteria can be found in Exhibit H.

## **REVIEWS**

Planning Division Review. The Draper City Planning Division has completed their review of the Permitted Use Permit submission. Comments from this division, if any, can be found in Exhibit A.

Engineering and Public Works Divisions Review. The Draper City Engineering and Public Works Divisions have completed their reviews of the Permitted Use Permit submission. Comments from these divisions, if any, can be found in Exhibit A.

Building Division Review. The Draper City Building Division has completed their review of the Permitted Use Permit submission. Comments from this division, if any, can be found in Exhibit A.

Fire Division Review. The Draper City Fire Marshal has completed his review of the Permitted Use Permit submission. Comments from this division, if any, can be found in Exhibit A.

Noticing. A Notice of Decision will be issued in the manner outlined in the City and State Codes.

## **STAFF RECOMMENDATION**

Staff finds that the application complies with the DCMC and FCC Regulations and recommends that the Zoning Administrator review the request and approve the application together with the conditions of approval listed below, based on the findings and criteria for approval, as listed within the staff report.

If the Zoning Administrator approves the request, staff recommends the following conditions of approval:

1. That all requirements of the Draper City Engineering, Public Works, Building, Planning, and Fire Divisions are satisfied throughout the development of the site and the construction of all buildings on the site, including permitting.
2. That no additional changes or modification to the wireless facility are made without first obtaining written City approval for the proposed changes.

The findings for approval as are follows:

1. The proposed development plans meet the intent, goals, and objectives of the Draper City General Plan.
2. The proposed development plans meet the requirements and provisions of the Draper City Municipal Code.
3. The proposed development plans will not be deleterious to the health, safety, and general welfare of the general public nor the residents of adjacent properties.
4. The proposed development conforms to the general aesthetic and physical development of the area.
5. The public services in the area are adequate to support the subject development.



## DEVELOPMENT REVIEW COMMITTEE ACKNOWLEDGEMENT

We, the undersigned, as duly appointed members of the Draper City Development Review Committee, do acknowledge that the application which provides the subject for this staff report has been reviewed by the Committee and has been found to be appropriate for review by the Draper City Planning Commission and/or City Council.

**Brien Maxfield**

Digitally signed by Brien Maxfield  
DN: C=US, E=brien.maxfield@draperutah.gov,  
O=Draper, OU=Public Works - Engineering,  
CN=Brien Maxfield  
Date: 2026.01.12 08:16:00-0700'

Draper City Public Works Department

**Don Buckley**

Digitally signed by Don Buckley  
DN: C=US, E=don.buckley@draper.ut.us,  
O=Draper City Fire Department, OU=Fire  
Marshal, CN=Don Buckley  
Date: 2026.01.13 08:10:17-0700'

Draper City Fire Department

**Matthew Symes**

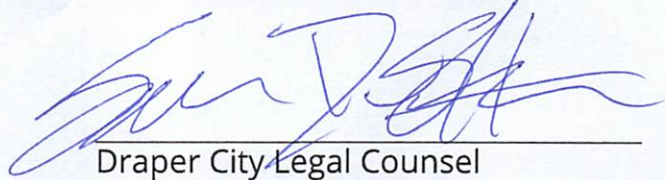
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DN: C=US,  
E=matt.symes@draperutah.gov,  
O=Draper City Corp., CN=Matthew Symes  
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Draper City Building Division

**Todd Draper**

Digitally signed by Todd Draper  
DN: C=US,  
E=todd.draper@draperutah.gov,  
O=Draper City Community  
Development Department,  
OU=Planning and Zoning,  
CN=Todd Draper  
Date: 2026.01.09 16:52:35-0700'

Draper City Planning Division



Draper City Legal Counsel

## EXHIBIT A DEPARTMENT REVIEWS

REVIEWS ARE NOT MEANT TO BE AN ALL-INCLUSIVE LIST OF POSSIBLE COMMENTS OR CONDITIONS.

### Planning Division Review.

1. No additional Comments.

### Engineering and Public Works Divisions Review.

1. No impact to drainage, traffic, or public utilities.

### Building Division Review.

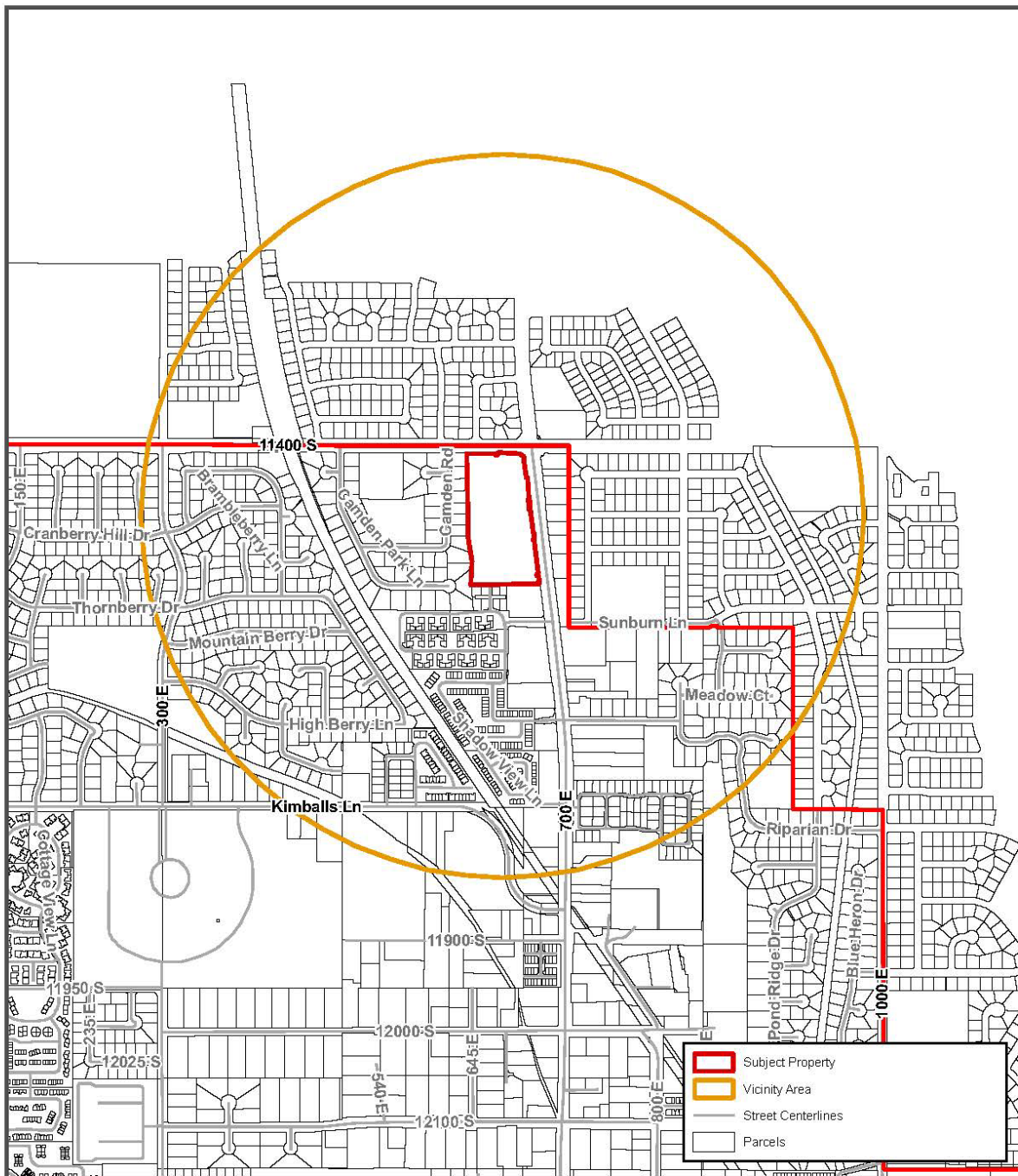
1. No additional Comments.

### Fire Division Review.

1. No additional Comments.



# EXHIBIT B VICINITY MAP



Date Printed: 12/19/2025

## AT&T 11400 S 700 E Upgrade – Permitted Use

656 E 11400 S, Suite H

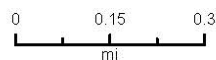




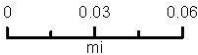
EXHIBIT C  
AERIAL MAP



Date Printed: 12/19/2025

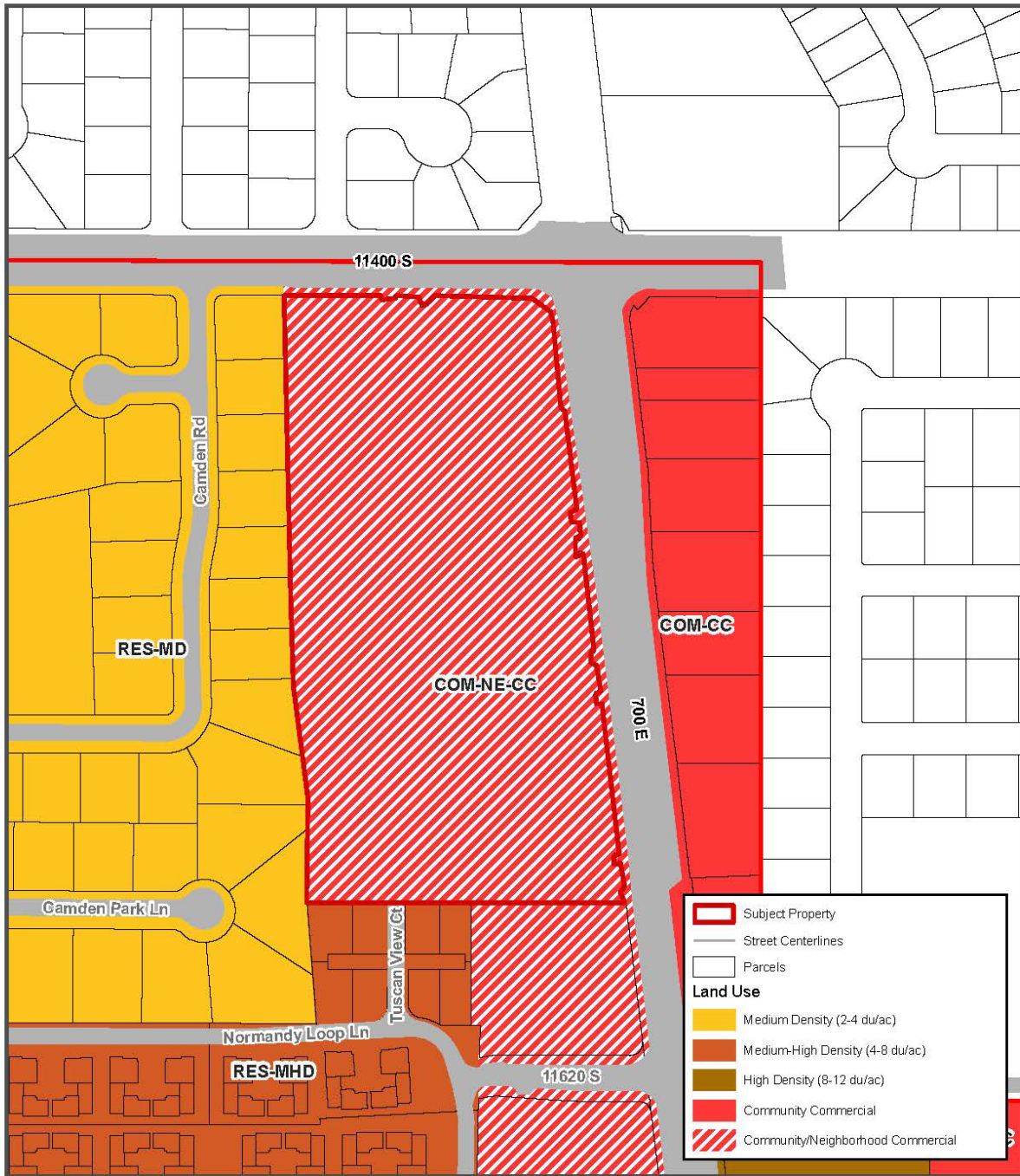
**AT&T 11400 S 700 E Upgrade – Permitted Use**

656 E 11400 S, Suite H





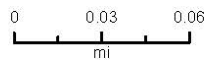
# EXHIBIT D LAND USE MAP



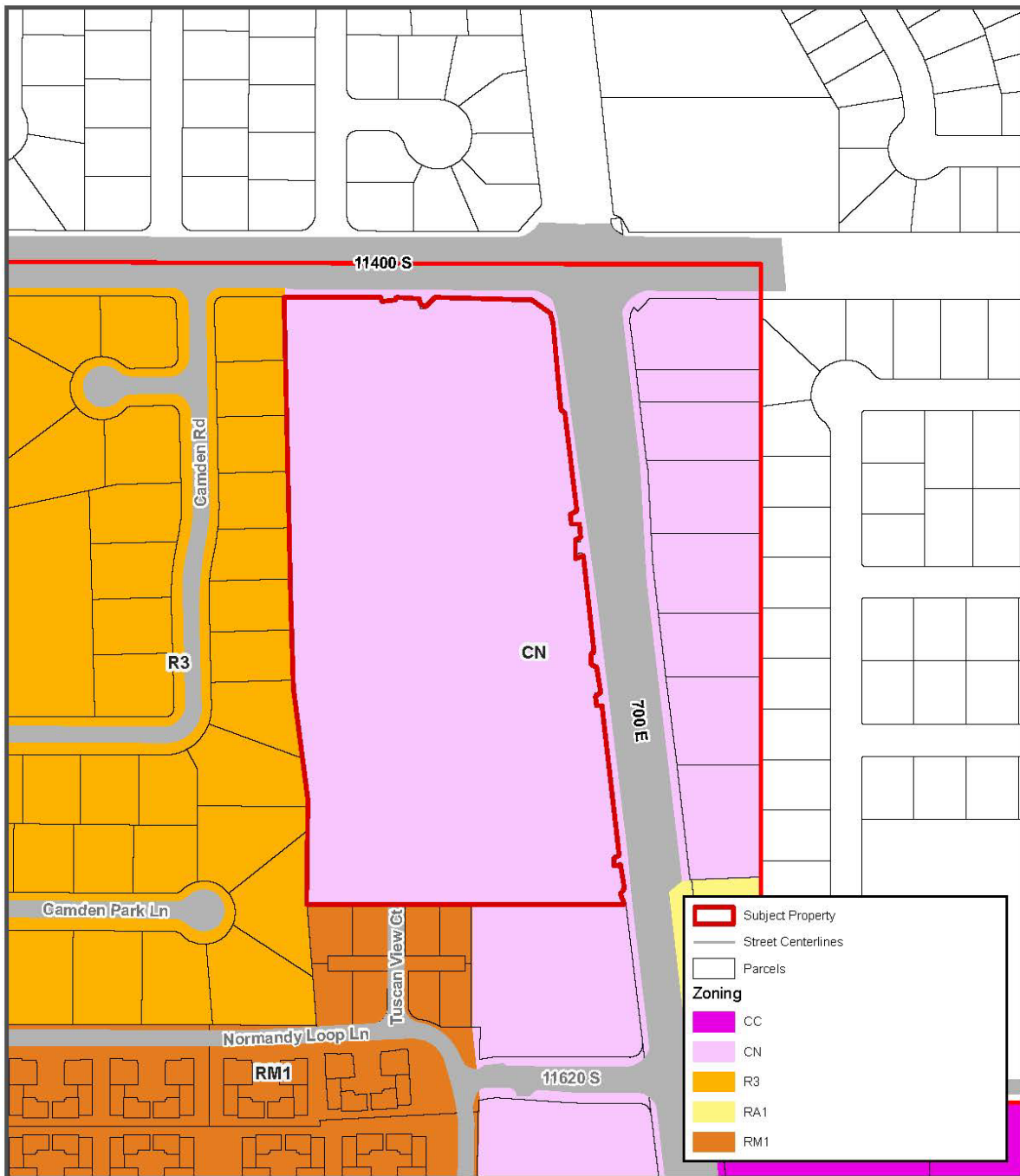
Date Printed: 12/19/2025

## AT&T 11400 S 700 E Upgrade – Permitted Use

656 E 11400 S, Suite H



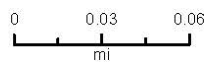
# EXHIBIT E ZONING MAP



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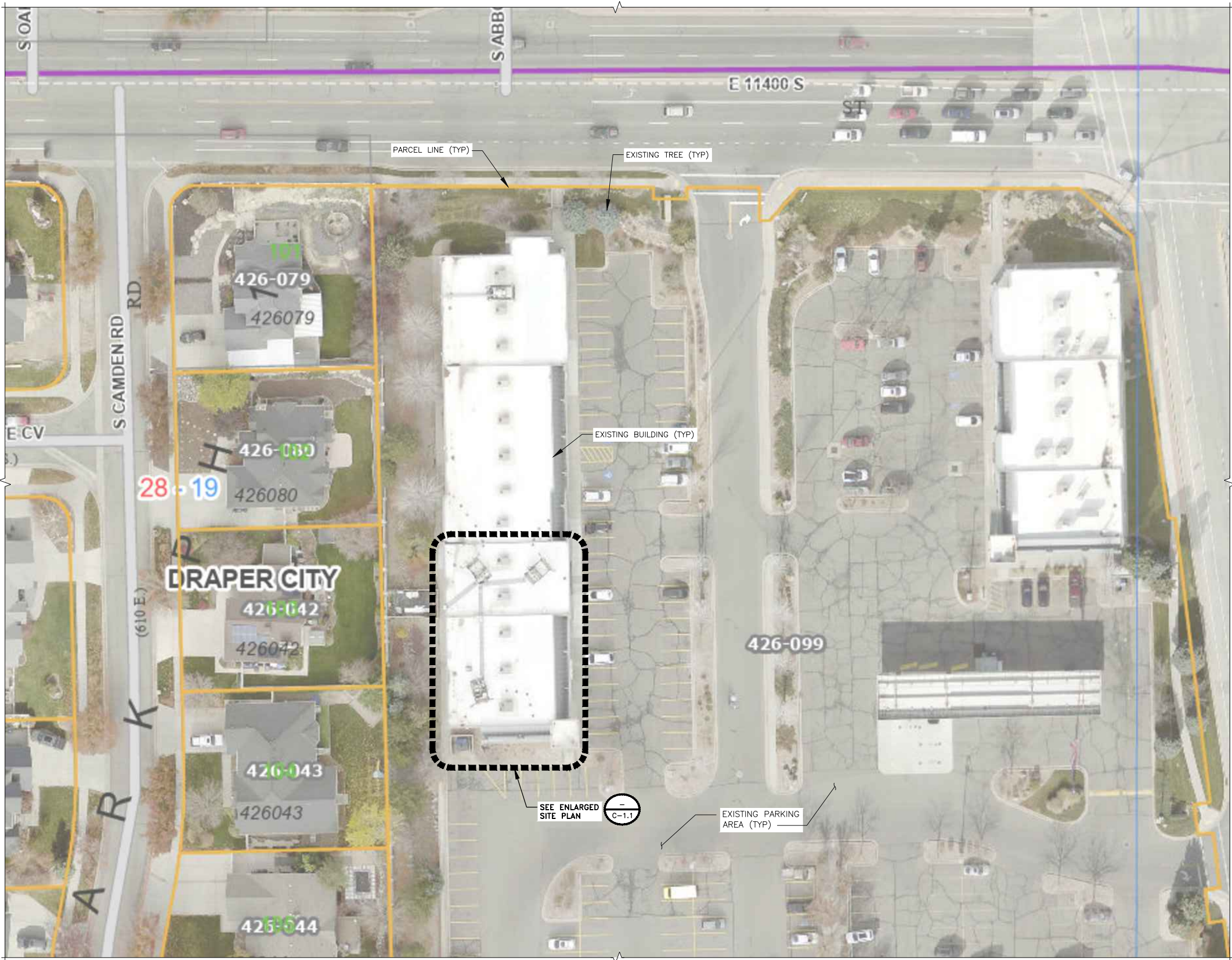
## AT&T 11400 S 700 E Upgrade – Permitted Use

656 E 11400 S, Suite H



**EXHIBIT F**  
**SITE PLANS**





NOTES

1. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.
2. ANTENNAS AND MOUNTS OMITTED FOR CLARITY.
3. SITE PLAN DISCLAIMER: THE EXISTING INFORMATION SHOWN IN THESE PLANS HAVE BEEN BASED ON EXISTING SITE INFORMATION PROVIDED BY OTHERS. THE GPD GROUP HAS NOT COMPLETED A SITE SURVEY AND THEREFORE MAKES NO CLAIMS AS TO THE ACCURACY OF INFORMATION DEPICTED ON THIS SHEET.



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1220 OLD ALPHARETTA ROAD  
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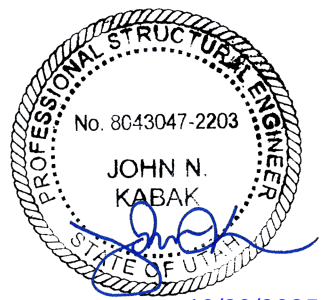
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CHECKED BY: MRL

RFDS: 5886444

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4	09/18/25	UPDATED PER JDX
3	07/29/25	UPDATED PER CLIENT
2	07/17/25	PER ZONING COMMENTS
1	03/20/25	FOR CONSTRUCTION
0	06/03/24	FINALS
A	05/10/24	ISSUED FOR REVIEW



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DRAPER, UT 84020  
CELL SITE RF MODIFICATIONS

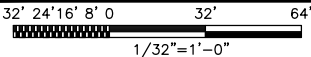
SHEET TITLE  
SITE PLAN

SHEET NUMBER  
**C-1**



SITE PLAN

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COAX & CABLE INFORMATION

- ALL EXISTING CABLES/COAX TO REMAIN UNLESS NOTED OTHERWISE
- (3) EXISTING 18-PAIR FIBER TRUNK
- (6) EXISTING #8 AWG DC POWER TRUNKS
- (2) EXISTING #6 AWG DC POWER TRUNK
- (6) EXISTING 7/8" COAX
- (1) EXISTING 3/8" RET
- ROUTED WITHIN EXISTING ROOFTOP

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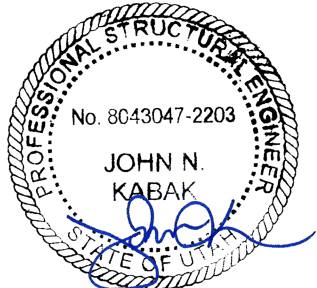
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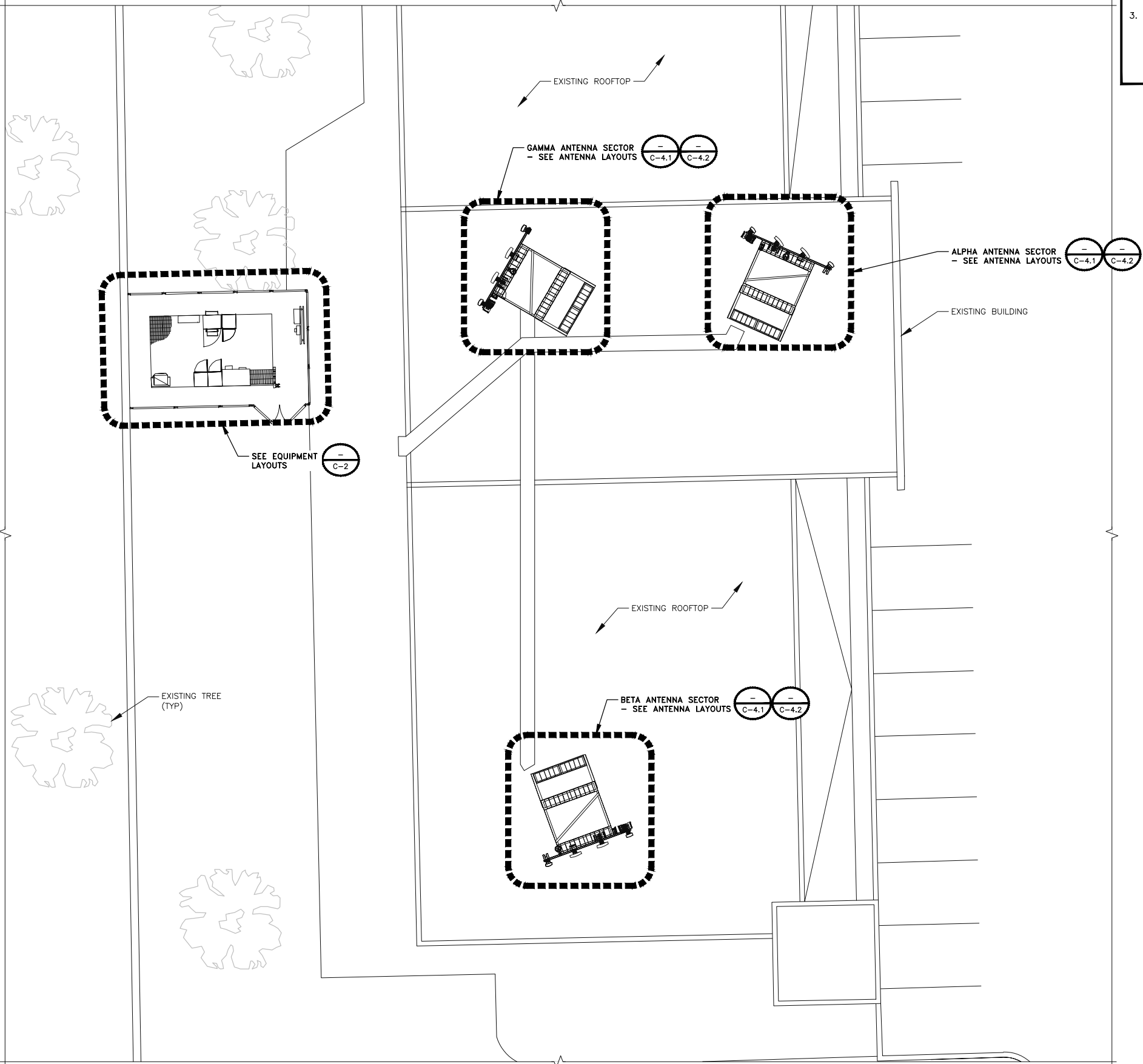
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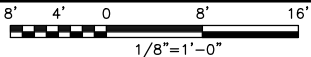
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CELL SITE RF MODIFICATIONS

SHEET TITLE  
ENLARGED SITE PLAN

SHEET NUMBER  
C-1.1



EXISTING SITE PLAN





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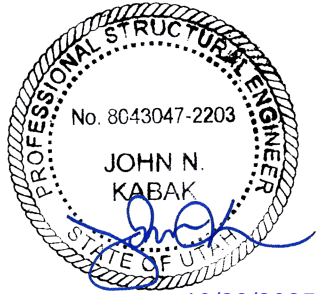
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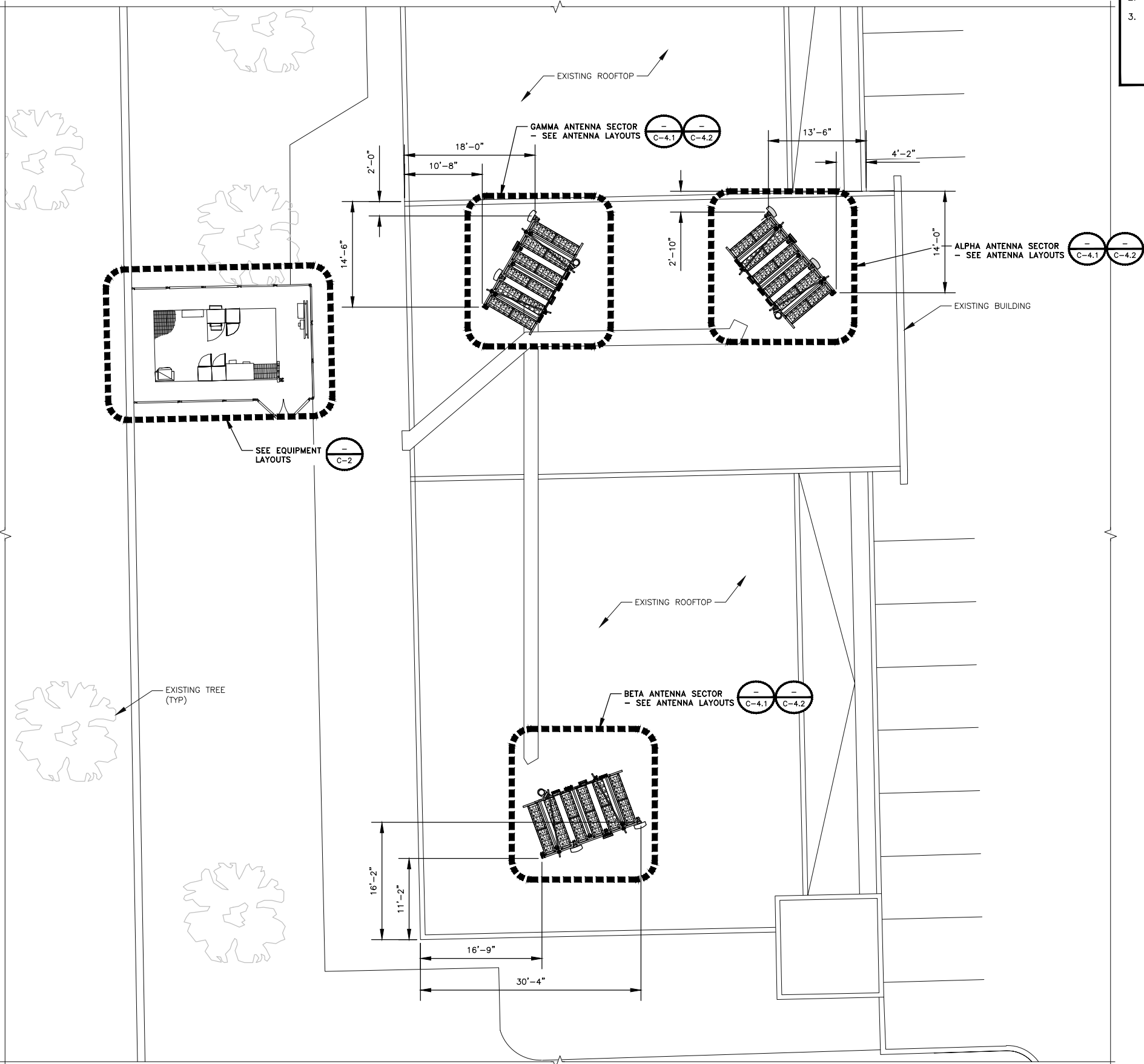
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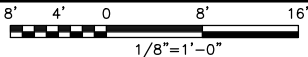
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ENLARGED SITE PLAN

SHEET NUMBER

C-1.2



PROPOSED SITE PLAN



**EXHIBIT G**  
**ELEVATIONS AND EQUIPMENT LAYOUT**




NOTES

1. THIS DRAWING IS INTENDED TO DEPICT THE GENERAL LOCATION AND HEIGHT OF THE NEW EQUIPMENT ON THE EXISTING TOWER.  
2. CONTRACTOR TO REFER TO THE TOWER STRUCTURAL ANALYSIS AND COORDINATE COAX LAYOUT WITH THE SITE CONSTRUCTION MANAGER,

STRUCTURAL ANALYSIS:  
REFER TO STRUCTURAL ANALYSIS BY ACCELERATED TOWER ENGINEERING, DATED JULY 28, 2025.

- COAX & CABLE INFORMATION
- ALL EXISTING CABLES/COAX TO REMAIN UNLESS NOTED OTHERWISE
  - (3) EXISTING 18-PAIR FIBER TRUNK
  - (6) EXISTING #8 AWG DC POWER TRUNKS
  - (2) EXISTING #6 AWG DC POWER TRUNK
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AT&T

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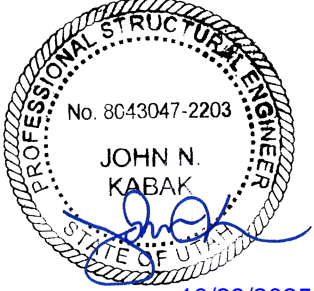
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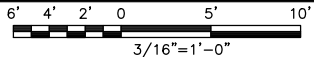
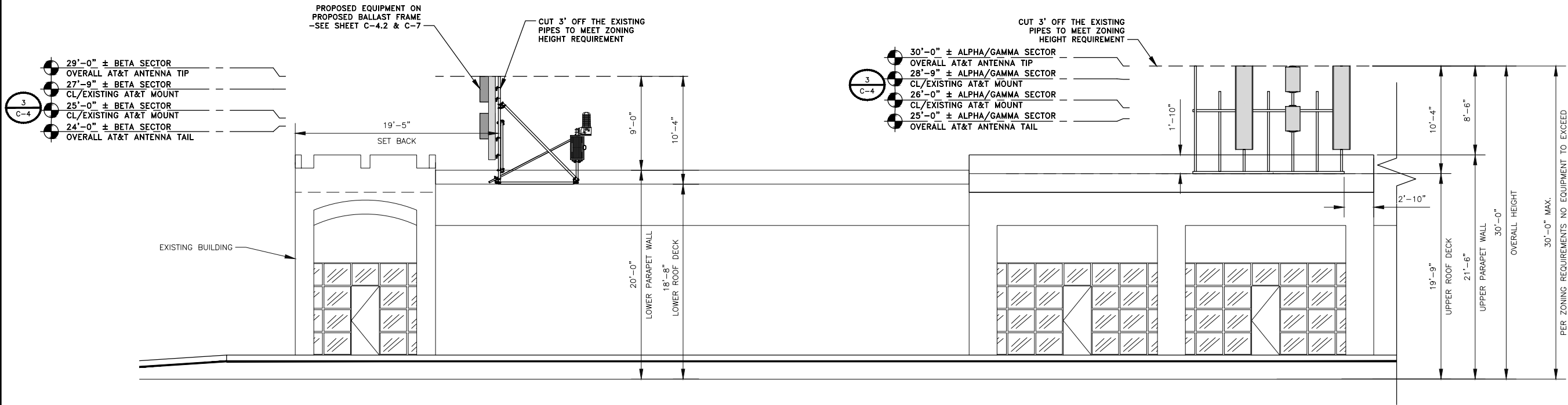
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11400 S & 700 E  
UTL02005  
656 EAST & 11400 SOUTH  
DRAPER, UT 84020  
CELL SITE RF MODIFICATIONS

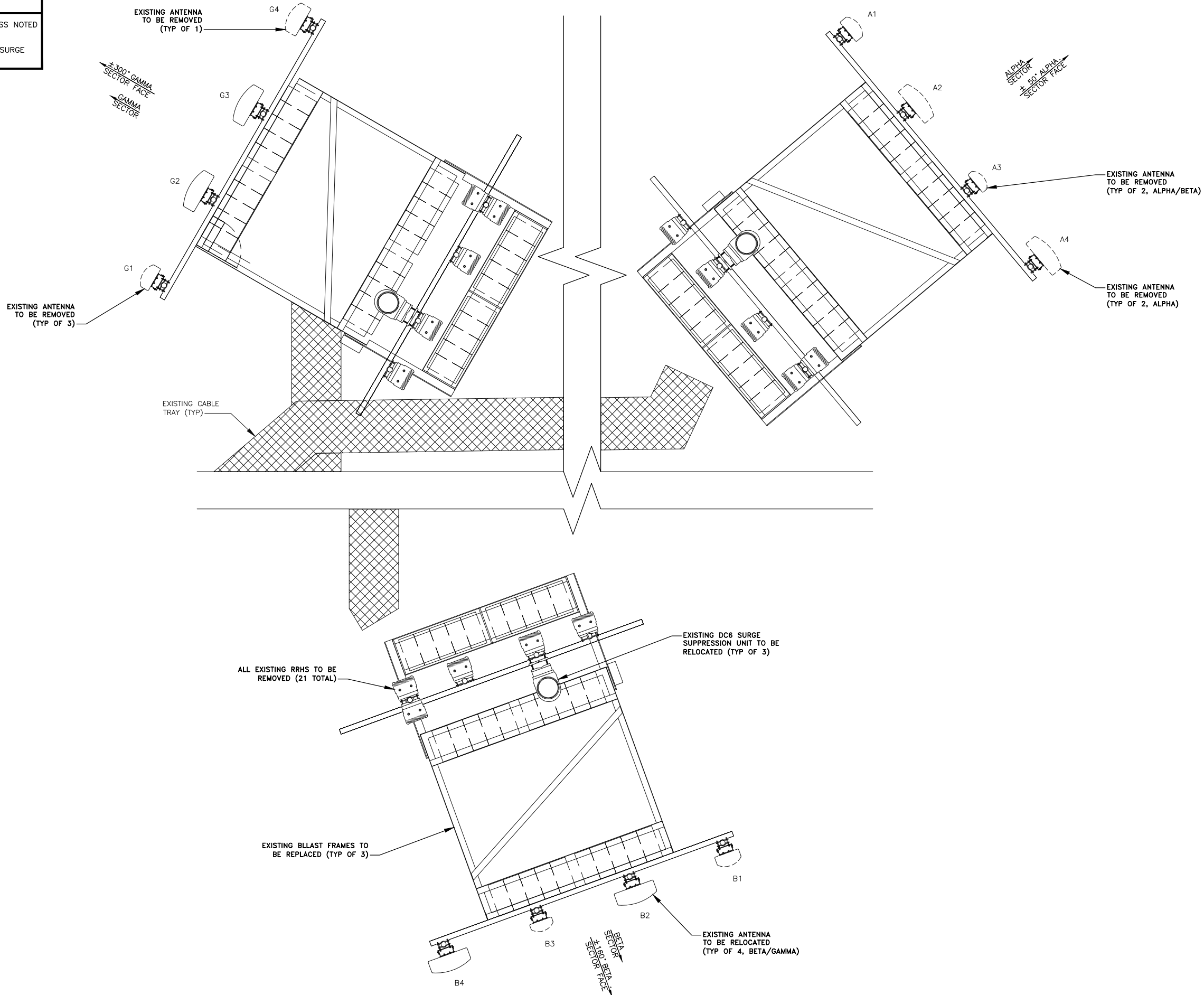
SHEET TITLE  
ELEVATIONS

SHEET NUMBER  
C-3

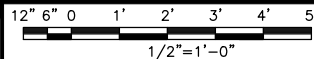


NOTE

1. ALL EXISTING EQUIPMENT TO REMAIN UNLESS NOTED OTHERWISE.
2. DECOMMISSION IN PLACE EXISTING FC-12 SURGE SUPPRESSOR.



EXISTING ANTENNA LAYOUT



7670 S CHESTER ST  
ENGLEWOOD, CO 80112



1220 OLD ALPHARETTA ROAD  
SUITE 380  
ALPHARETTA, GA 30005



**GPD GROUP**  
Professional Corporation

520 South Main Street, Suite 2531  
Akron, OH 44311  
330.572.2100 Fax 330.572.2101

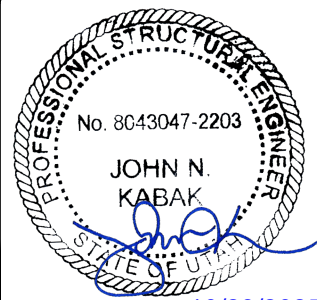
GPD JOB #: 2024723.02/82465.01

DRAWN BY: DRD

CHECKED BY: MRL

RFDS: 5886444

REV	DATE	DESCRIPTION
5	10/29/25	UPDATED PER JDX
4	09/18/25	UPDATED PER JDX
3	07/29/25	UPDATED PER CLIENT
2	07/17/25	PER ZONING COMMENTS
1	03/20/25	FOR CONSTRUCTION
0	06/03/24	FINALS
A	05/10/24	ISSUED FOR REVIEW



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UNLESS THEY ARE ACTING UNDER THE DIRECTION  
OF A LICENSED PROFESSIONAL ENGINEER,  
TO ALTER THIS DOCUMENT.

11400 S & 700 E  
UTL02005  
656 EAST & 11400 SOUTH  
DRAPER, UT 84020  
CELL SITE RF MODIFICATIONS

SHEET TITLE  
ANTENNA SCHEDULE &  
LAYOUTS

SHEET NUMBER

**C-4.1**

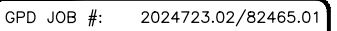
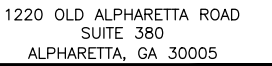
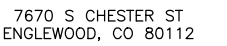
<u>NOTE</u>	
1.	ALL NEW AND RELOCATED ANTENNA MOUNT PIPES TO BE REPLACED WITH 2-7/8" ANTENNA PIPES.
2.	ANTENNA MOUNTING PIPE & CROSSOVER PLATE KITS FOR STACKED AIR6419 ANTENNAS SHALL BE REPLACED WITH NEW. SEE DETAIL 1, SHEET C-5.

1. ALL NEW AND RELOCATED ANTENNA MOUNT PIPES TO BE REPLACED WITH 2-7/8" ANTENNA PIPES.
2. ANTENNA MOUNTING PIPE & CROSSOVER PLATE KITS FOR STACKED AIR6419 ANTENNAS SHALL BE REPLACED WITH NEW. SEE DETAIL 1, SHEET C-5.



12" 6" 0 1' 2' 3' 4' 5'

$\frac{1}{2}" = 1' - 0"$

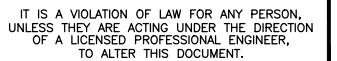


DRAWN BY: DRD

CHECKED BY: MRL

RFDS: 5886444

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A	05/10/24	ISSUED FOR REVIEW
REV	DATE	DESCRIPTION



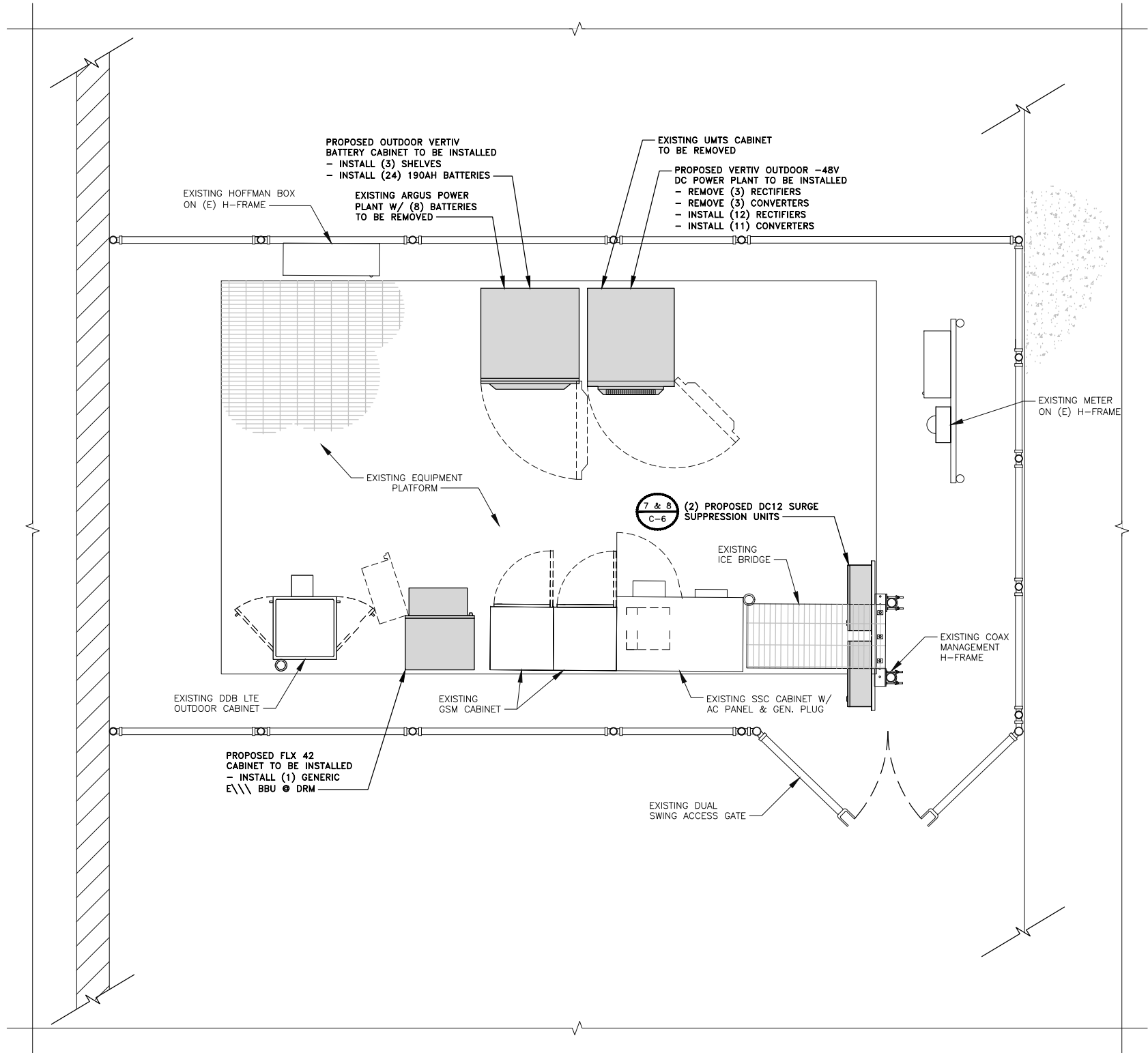
11400 S & 700 E  
UTL02005  
656 EAST & 11400 SOUTH  
DRAPER, UT 84020  
CELL SITE RF MODIFICATIONS

## SHEET TITLE

### ANTENNA SCHEDULE & LAYOUTS

SHEET NUMBER

## C-4.2



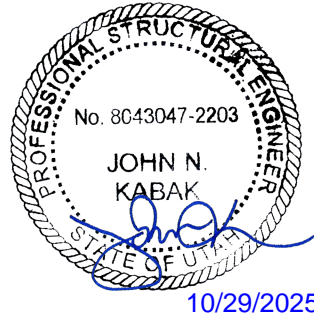
NOTES

1. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.
2. SITE PLAN DISCLAIMER: THE EXISTING INFORMATION SHOWN IN THESE PLANS HAVE BEEN BASED ON EXISTING SITE INFORMATION PROVIDED BY OTHERS. THE GPD GROUP HAS NOT COMPLETED A SITE SURVEY AND THEREFORE MAKES NO CLAIMS AS TO THE ACCURACY OF INFORMATION DEPICTED ON THIS SHEET.
3. IFC 1207 & IMC 502.4 CODE ANALYSIS & BATTERY COMPLIANCE INFORMATION SHOWN ON SHEET GN-7.
4. REFER TO BATTERY DATA CHART ON SHEET GN-7. IF BATTERY kWh CALCULATION REQUIRES ADHERENCE TO IFC 1207, AN ON-SITE BATTERY SPILL CLEAN-UP KIT SHALL BE PROVIDED ON SITE. ON-SITE BATTERY SPILL KIT SHALL BE CAPABLE OF NEUTRALIZING A SPILL OF ELECTROLYTE FROM THE LARGEST BATTERY OR VESSEL. CONTRACTOR SHALL CONFIRM THE LARGEST BATTERY ELECTROLYTE VOLUME (GALLONS) AND ENSURE THE KIT IS CAPABLE OF NEUTRALIZING THAT VOLUME, AT A MINIMUM.



GPD JOB #:	2024723.02/82465.01
DRAWN BY:	DRD
CHECKED BY:	MRL
RFDS:	5886444

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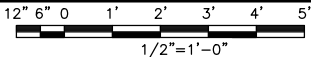
11400 S & 700 E  
UTL02005  
656 EAST & 11400 SOUTH  
DRAPER, UT 84020  
CELL SITE RF MODIFICATIONS

SHEET TITLE  
EQUIPMENT LAYOUTS

SHEET NUMBER

C-2

FINAL EQUIPMENT LAYOUT





REV	DATE	DESCRIPTION
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4	09/18/25	UPDATED PER JDX
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2	07/17/25	PER ZONING COMMENTS
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REFERENCE  
ONLY

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SHEET TITLE  
EQUIPMENT DETAILS

SHEET NUMBER

C-7

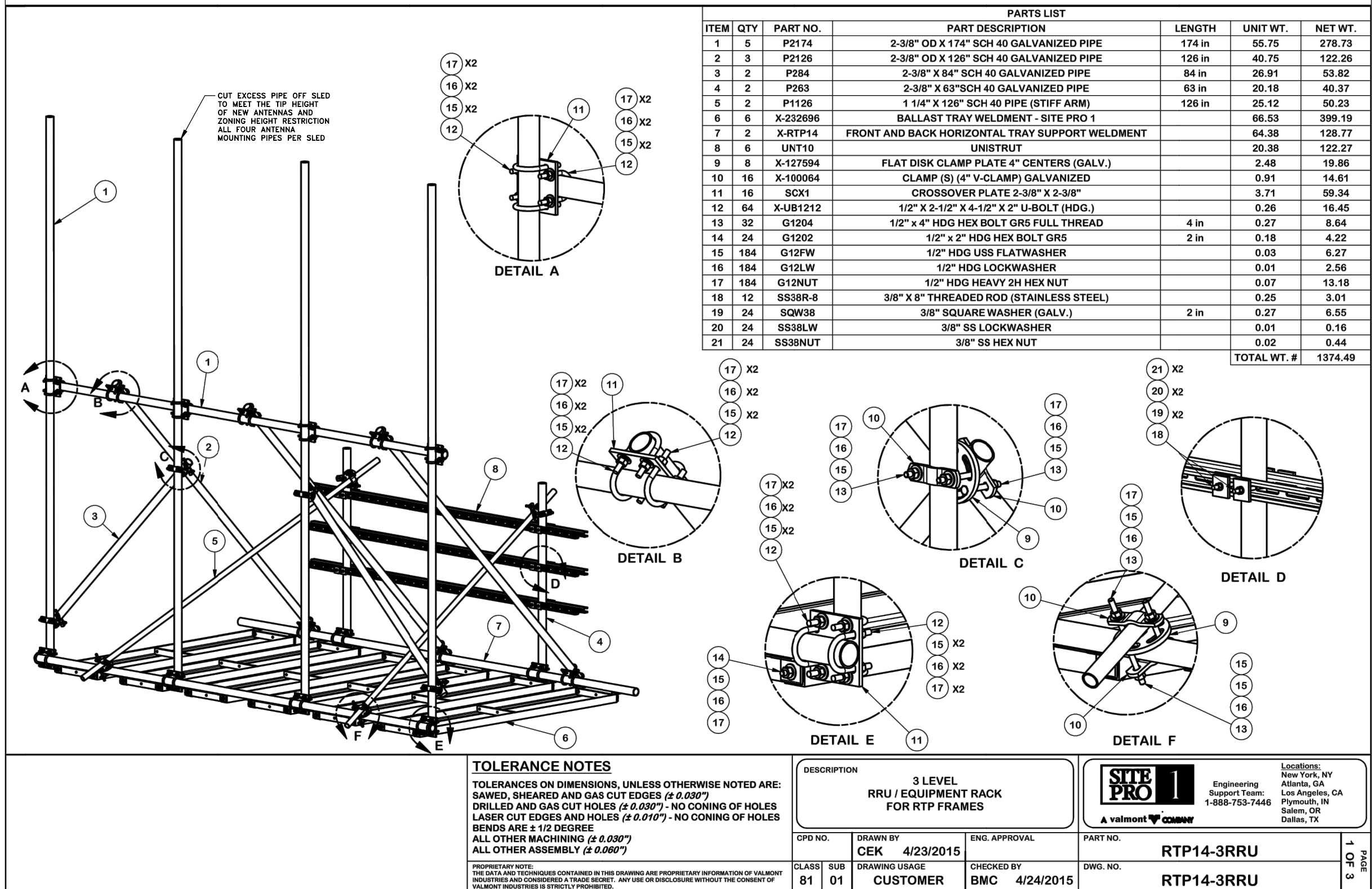


EXHIBIT H  
APPLICANT QUESTIONNAIRE

## Re: AT&T Existing Rooftop Wireless Communication Facility

Site Name: 11400 S 700 E

Site ID: UTL02005 / 10100321

Address: **656 East and 11400 South Draper, UT 84020**

1. Is this use permitted in the zone in which this use is proposed? **YES**
2. Does the proposed use conform to the development standards in the applicable zone? **YES**
3. Does the proposed use conform to the general regulations and regulations for specific uses set forth in this Title? **YES**
4. Is the proposed use located on any land classified as a primary or secondary conservation area or sensitive land?(This excludes land that is expressly permitted in the Draper City Municipal Code.) **NO**
5. Is the proposed use located in any protected area shown on a natural resource inventory? **NO**
6. Please identify any other applicable requirements of the Draper City Municipal Code & explain how the proposed use conforms to these requirements. **The City's general plan supports the deployment of wireless services. The city code clarifies requirements that must be met in order to construct or alter an existing tower. AT&T is currently in compliance with all code requirements as well as the requirements of the CUP that was issued in relation to the initial construction of this tower. The current proposal is maintenance only as we are removing old antennas and replacing them with new models. There will be no change to the tower height, compound, fence, color or power requirements and as such AT&T will remain in compliance with all requirements of the city code. This is consistent with the objectives of the city's general plan as it is the least intrusive way to improve service in the area.**
- 7.