

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: May 15, 2025

TO: Zoning Hearing Officer

FROM: Planning Staff

SUBJECT: Consideration of a Use Permit Renewal and Amendment, pursuant to Sections 6500 and 6512.6 of the San Mateo County Zoning Regulations, to allow the continued operation of an existing telecommunications facility operated by T-Mobile. Proposed changes include the removal of nine panel antennas, with the replacement of six panel antennas, as well as the removal and replacement of six Remote Radio Units (RRUs) and associated supporting equipment located within existing screening enclosures on the rooftop. Additional upgrades involve supporting equipment located both on the rooftop and within the building of a commercial property at 3351 El Camino Real within unincorporated San Mateo County.

County File Number: PLN 2004-00177 (T-Mobile)

PROPOSAL

The applicant proposes to renew and amend a use permit to allow a cellular communications facility on the roof of the commercial office building at 3351 El Camino Real in the unincorporated North Fair Oaks area of the County. Proposed changes include the removal of nine panel antennas, with the replacement of six panel antennas, as well as the removal and replacement of six Remote Radio Units (RRUs) and associated supporting equipment located within existing screening enclosures on the rooftop of the subject property.

RECOMMENDATION

Approve the Use Permit Amendment, County File No. PLN 2004-00177, by making the required findings and adopting the conditions of approval listed in Attachment A.

BACKGROUND

Report Prepared By: Randall Cohen, Project Planner; Email: rcohen@smcgov.org.

Applicant: T-Mobile (Agent: The CBR Group, Inc.)

Owner: Atherton Rose, LLC

Second Owner: Atherton Chatelain, LLC

Location: 3351 El Camino Real; North Fair Oaks

APN: 060-282-580

Parcel Size: 31,471 sq. ft.

Existing Zoning: CMU-1 Planned Unit Development District 139

General Plan Designation: Medium High Density, Commercial Mixed Use

Existing Land Use: Commercial Office Space

Water Supply: California Water Service

Sewage Disposal: Fair Oaks Sewer Maintenance District

Flood Zone: FEMA Zone X (Area of Minimal Flooding); Community Panel No. 06081C-0304E; Effective Date: 2012.

Environmental Evaluation: Categorically exempt pursuant to Section 15301, Class 1 (the minor alteration of an existing structure).

The subject property is located on El Camino Real, northwest of its intersection with Loyola Avenue. The site is currently developed with a two-story office building. Various commercial establishments line El Camino Real near the property. To the northeast, in the North Fair Oaks area, there is a mix of single-family and multi-family residential developments. Across El Camino Real to the southwest, in the Town of Atherton, single-family residential properties are predominant.

DISCUSSION

A. KEY ISSUES

1. Conformance to the General Plan

Staff has determined that the project complies with all applicable General Plan policies, with specific discussion of the following:

Chapter 4–Visual Quality

Policy 4.20 (*Utility Structures*) requires minimization of visual impacts generated by utility structures. As conditioned, the project has a negligible visual impact – screened by a fiber reinforced polymer (FRP) cupola.

There are two antenna models proposed for this project. The first antenna: AIR 6419 B41 are rectangle in shape, and measures 33.6-inch tall, 20.0-

inch wide and 6.3-inch deep; these antennas will have RAD centers of 50.9 feet above ground level. The second antenna: APXVAALL18_43-U-NA20 are rectangle in shape, and measures 72.0-inch tall, 24.0-inch wide, and 8.9-inch deep; these antennas will have RAD centers of 35-foot 7-inch. These units serve to run the equipment that interfaces with the T-Mobile Wireless communications network. The drawings and photographic simulations included with this application depict the design and its appearance on the building minimizing the impact of the visible portions of the project by giving them the appearance of architectural features that are integral parts of the building.

2. Conformance to Zoning Regulations

Under the provisions of Section 6500 (*Use Permits*), wireless communications facilities are permitted in the CMU-1 District upon issuance of a use permit. The project complies with all development standards for this zoning district, including height. The maximum permitted height for antennas and architectural features in the CMU-1 District is 60 feet. The highest elevation of any equipment will be 38 feet, 7 inches feet above grade.

The cabinets and new antennas proposed for this project will be mounted to the roof of the office building. The placement of the equipment in this location does not result in a loss of parking spaces required by zoning regulations and does not detract from the primary commercial function of the existing office building.

3. Conformance to the Wireless Telecommunications Facilities (WTF) Ordinance

New wireless telecommunications facilities must be reviewed for conformance to the Wireless Telecommunications Facilities Ordinance. This facility was found to conform to the Ordinance when its permit was renewed in 2014. Below is a point-by-point review of how the changes to this facility conform to the Ordinance by subsection:

6512.2.E – The adverse visual impact of utility structures shall be avoided by: (1) siting new wireless telecommunication facilities outside of public viewshed whenever feasible; (2) maximizing the use of existing vegetation and natural features to cloak wireless telecommunication facilities; and (3) constructing towers no taller than necessary to provide adequate coverage. When visual impacts cannot be avoided, they shall be minimized and mitigated by: (a) screening wireless telecommunication facilities with landscaping consisting of non-invasive and/or native plant material; (b) painting all equipment to blend with existing landscape colors; and (c) designing wireless telecommunication facilities to blend in with the surrounding environment. Attempts to replicate trees or other natural objects shall be used as a last resort. Landscaping shall be maintained by the property or facility owner and/or operator. The landscape screening requirement may be modified or waived by the Director of Planning and Building or their designee in instances where it would not be appropriate or necessary, such as in a commercial or industrial area.

This wireless telecommunication facility will be screened from public view by a parapet roof and FRP cupolas. The equipment will be painted to match the parapet roof and set back far enough from the roof that they will only be visible from certain angles.

6512.2.F – Paint colors for the wireless telecommunication facility shall minimize its visual impact by blending with the surrounding environment and/or building.

Condition of Approval No. 3 requires that the equipment be painted to match the building roof.

6512.2.G – The exteriors of wireless telecommunication facilities shall be constructed of non-reflective materials.

Condition of Approval No. 3 requires that the paint on the equipment be matte.

6512.2.H – The wireless telecommunication facility shall comply with all the requirements of the underlying zoning district(s), including, but not limited to, setbacks, Design Review in the DR district(s), Architectural Review in designated Scenic Corridors, and Coastal Development Permit regulations in the CZ or CD zones.

The facility does not encroach upon any setbacks and is within the envelope of the existing building. It will be beneath the maximum height allowed in the CMU-1 District in that it is 38 feet – 7 inches in a district that allows antennas and architectural features to be 60 feet tall.

6512.2.I.3 – [A ground-mounted spire may stand up to 150 feet tall, but a] building-mounted wireless telecommunication facility shall not exceed the

maximum height allowed in the applicable zoning district, or 16 feet above the building roofline, whichever is higher, except that in any Residential (R) district, no monopole or antenna shall exceed the maximum height for structures allowed in that district.

The building-mounted facility reaches a maximum height of 38 feet, 7 inches, and the CMU-1 District allows a maximum height of 60 feet.

6512.2.L – Diesel generators shall not be installed as an emergency power source unless the use of electricity, natural gas, solar, wind or other renewable energy sources are not feasible. If a diesel generator is proposed, the applicant shall provide written documentation as to why the installation of options such as electricity, natural gas, solar, wind or other renewable energy sources is not feasible.

The facility uses a battery to provide backup power.

4. Conformance to the Conditions of Last Approval

- a. This approval applies only to the proposal as described in this report, plans, and documents submitted to the Current Planning Section on October 4, 2012, and as approved by the Zoning Hearing Officer on March, 6, 2014. Minor revisions or modifications to these projects may be made subject to the review and approval of the Director of Planning of Building if they are consistent with the intent of and in substantial conformance with this approval.

Conformance to condition? Yes.

Recommend to retain condition? Yes, with the dates updated.

- b. The use permit shall be valid for a period of ten years, ending on May 15, 2035. The applicant shall apply for renewal of the use permit and pay applicable renewal fees six months prior to expiration. There shall be an administrative review for compliance with conditions of approval of this use permit in May 2027.

Conformance to condition? Yes.

Recommend to retain condition?

Yes, but with the dates changed to reflect the date of approval of this amendment.

- c. Antenna poles shall remain enclosed and painted to match the roof of the existing building upon which they will be located.

Conformance to condition? Yes.

Recommend to retain condition? Yes, as modified in Attachment A.

- d. Construction hours shall be Monday through Friday, 7:00 a.m. to 6:00 p.m., Saturday, 9:00 a.m. to 5:00 p.m., and no construction will be allowed on Sundays or national holidays.

Conformance to condition? Yes.

Recommend to retain condition? Yes.

- e. Noise levels produced by the proposed construction activity shall not exceed 80-dBA level at any one moment.

Conformance to condition? Yes.

Recommend to retain condition? Yes.

- f. The installation shall be removed in its entirety within 90 days from when this technology becomes obsolete or this facility is no longer needed.

Conformance to condition? Yes.

Recommend to retain condition? Yes.

5. Conformance to the Use Permit Findings

Under the provisions of Section 6500 and 6512.6, wireless communications facilities are permitted in the CMU-1 Zoning District after issuance of a use permit. The following two findings must be made for the issuance of the use permit:

- a. **Find that the establishment, maintenance and/or conducting of the use will not, under the circumstances of the particular case, result in a significant adverse impact, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood.**

The impact of this project is minimal. The applicant has submitted a radio frequency (RF) emissions report as part of the application. The report analyzes the RF emissions emitted by the project. The report concludes that in no area will the project exceed the public exposure limit set by the Federal Communications Commission, and in no area accessible by the public will the emissions exceed 5 percent of the limit for public exposure.

Because the system is unmanned and requires approximately one service visit per month, it does not generate additional traffic, noise, or intensity of use of the property. The antennas are screened and do not present a significant visual impact to the surrounding area.

b. Find that the use is necessary for the public health, safety, convenience or welfare.

This project allows increased clarity, range, and capacity of the existing cellular network and enhances service for the public in general. In addition, the project increases reliability and network coverage for law enforcement and other public safety personnel and improves reception for 911 calls. No adverse effects to public health and safety would result from this proposal.

B. ENVIRONMENTAL REVIEW

This project is exempt from environmental review pursuant to the California Environmental Quality Act (CEQA), Section 15301, Class 1, relating to the minor alteration of existing structures.

C. REVIEWING AGENCIES

Building Inspection Section
Department of Public Works

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Proposed Antenna and Equipment Plan
- D. Proposed Antenna Plan - Alpha & Beta Sectors
- E. Proposed Antenna Plan – Gama Sector
- F. Elevations
- G. Photo Simulation

County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2004-00177

Hearing Date: May 15, 2025

Prepared By: Randall Cohen
Project Planner

For Adoption By: Zoning Hearing Officer

RECOMMENDED FINDINGS

For the Environmental Review, Find:

1. That this project is exempt from environmental review pursuant to the California Environmental Quality Act (CEQA), Section 15301, Class 1, relating to the minor alteration of an existing structure.

For the Use Permit, Find:

2. That the establishment, maintenance, and conducting of the proposed use will not, under the circumstances of the particular case, result in a significant adverse impact, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood in that the project does not exceed Federal Communications Commission (FCC) limits and does not generate additional activity on the site.
3. That the approval of this cellular telecommunications addition is necessary for the public health, safety, convenience or welfare in that it improves cellular telephone service for the public and public safety personnel.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal as described in this report, plans, and documents submitted to the Current Planning Section on October 30, 2024, and as approved by the Zoning Hearing Officer on May 15, 2025. Minor revisions or modifications to these projects may be made subject to the review and approval of the Director of Planning and Building if they are consistent with the intent of and in substantial conformance with this approval.
2. The use permit shall be valid for a period of ten years, ending on May 15, 2035. The applicant shall apply for renewal of the use permit and pay applicable renewal

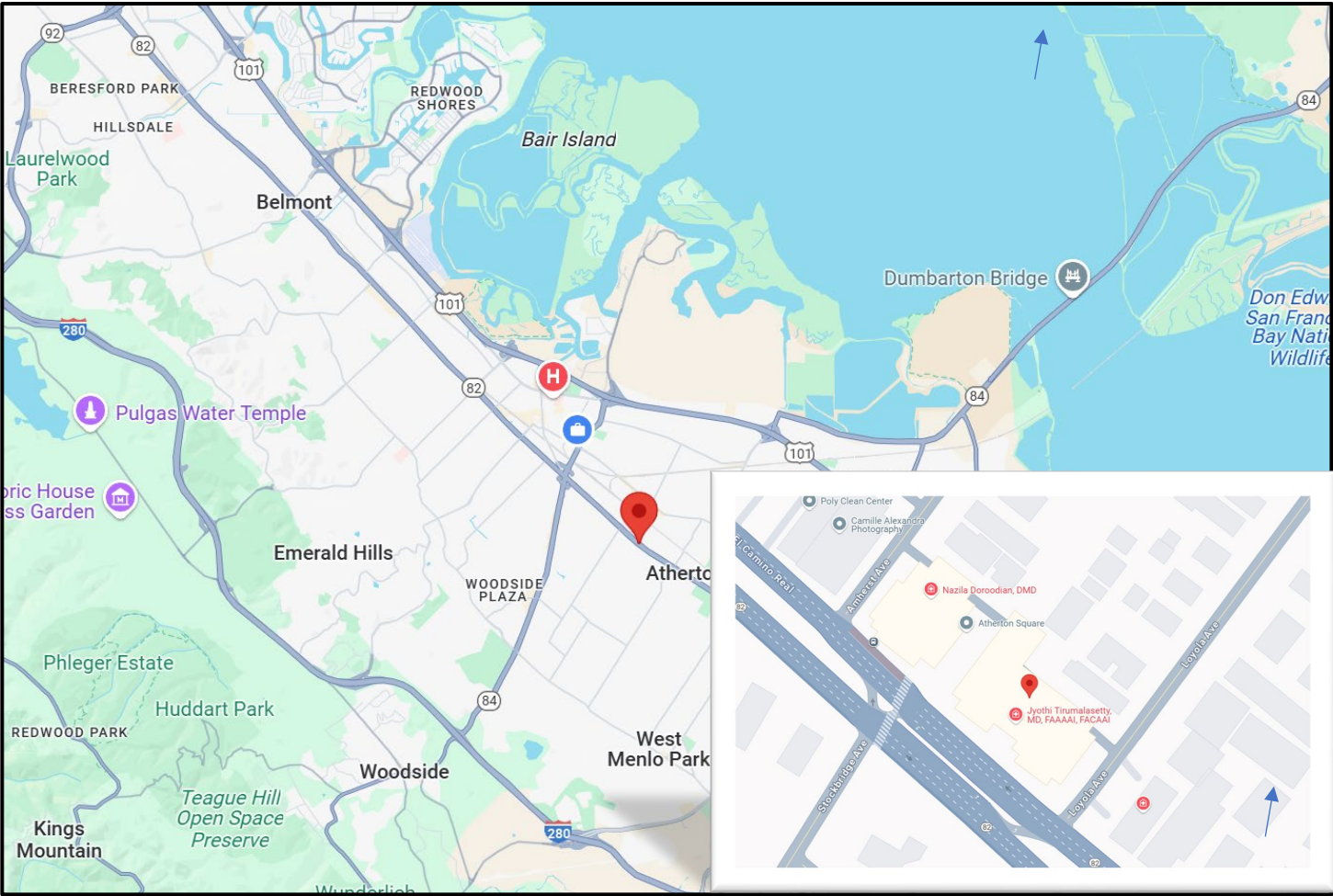
fees six months prior to expiration. There shall be an administrative review for compliance with conditions of approval of this use permit in May 2027.

3. All antennas shall remain enclosed within screenings, which must be painted to match the roof of the existing building upon which they will be located.
4. Construction hours shall be Monday through Friday, 7:00 a.m. to 6:00 p.m., Saturday, 9:00 a.m. to 5:00 p.m., and no construction will be allowed on Sundays or national holidays.
5. Noise levels produced by the proposed construction activity shall not exceed 80-dBA level at any one moment.
6. The installation shall be removed in its entirety within 90 days from when this technology becomes obsolete or this facility is no longer needed.
7. The project shall comply with all requirements of the Menlo Park Fire Protection District.

Building Inspection Section

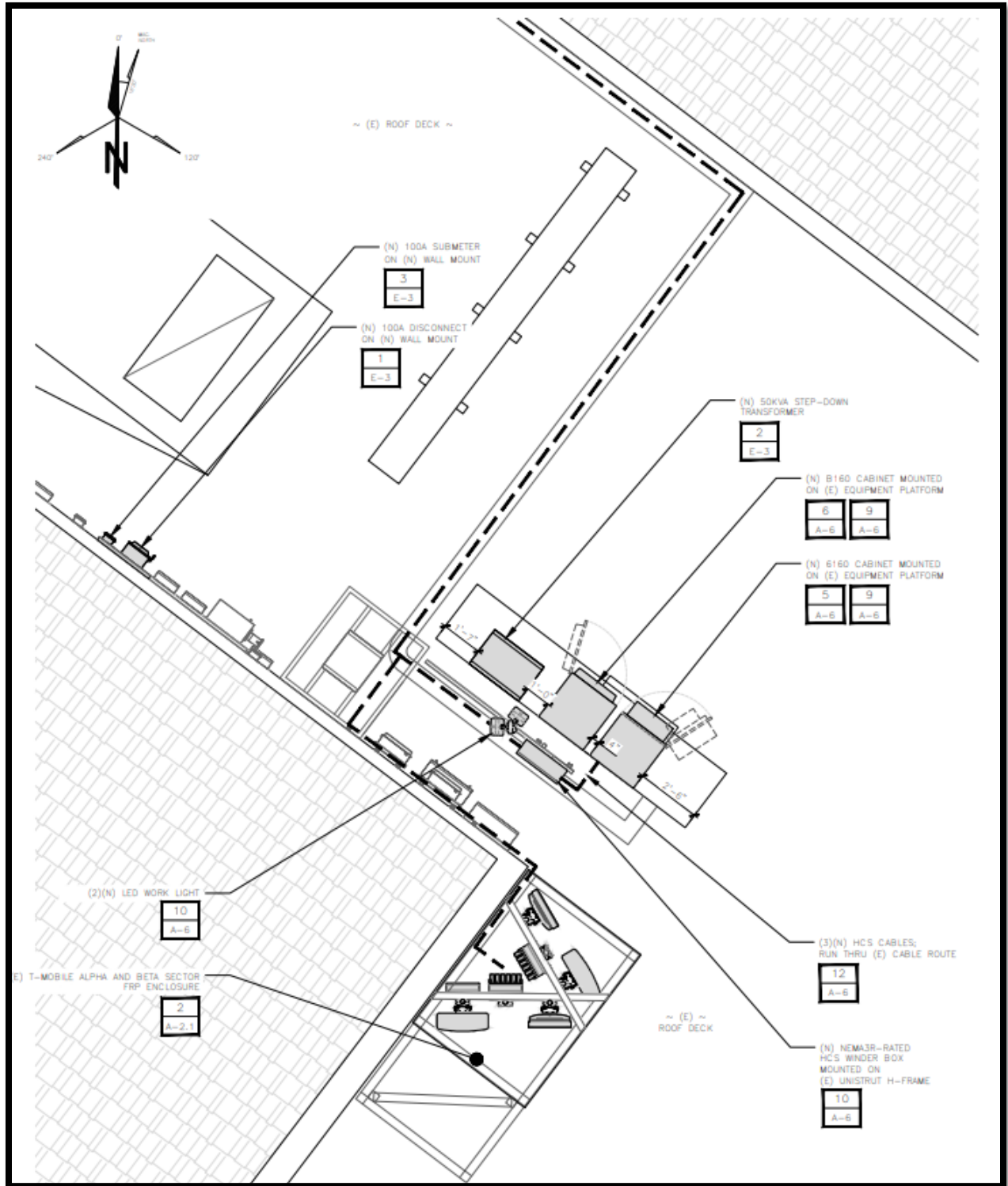
8. Building permits will be required for any new equipment.

Vicinity Map

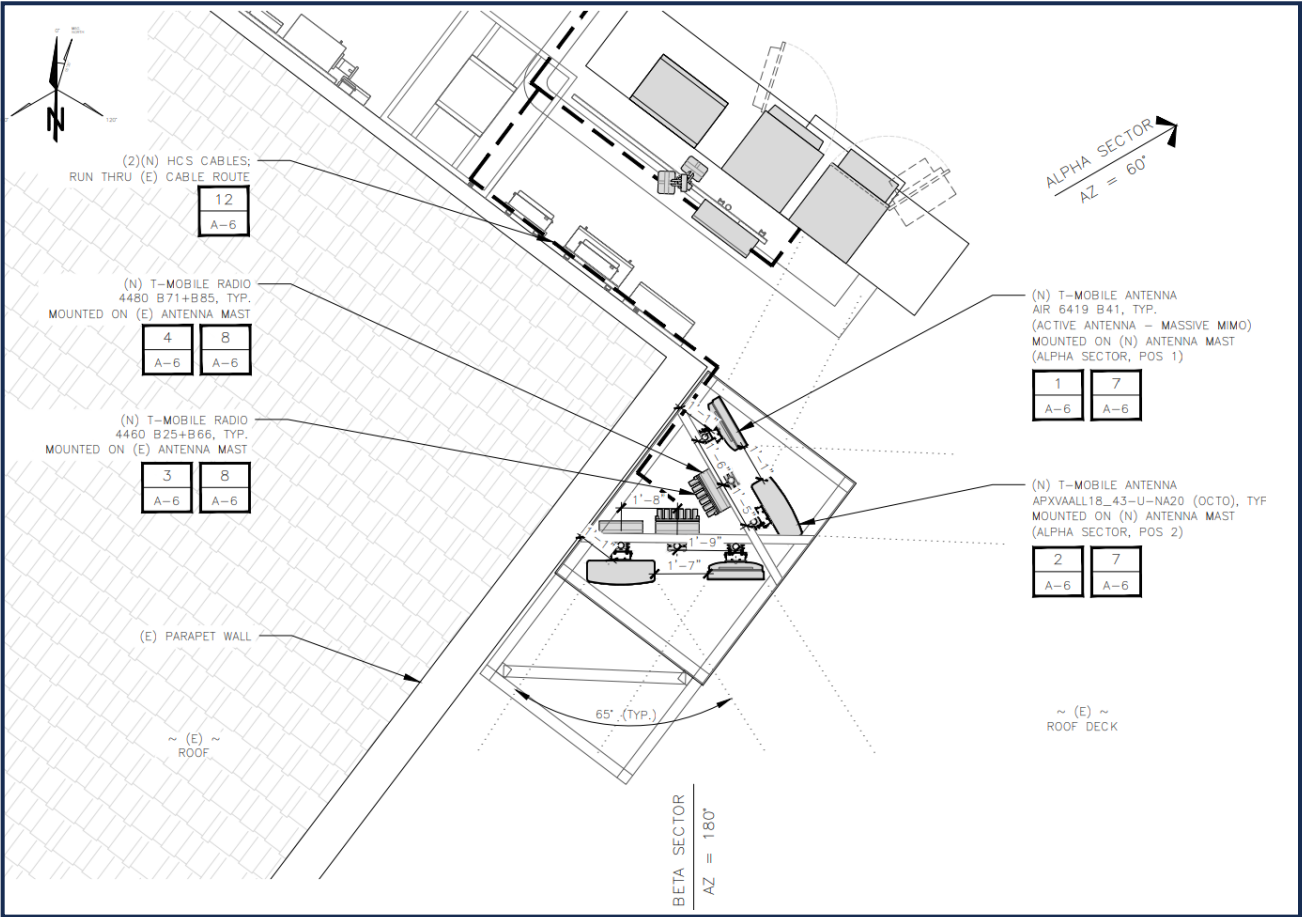


Attachment C

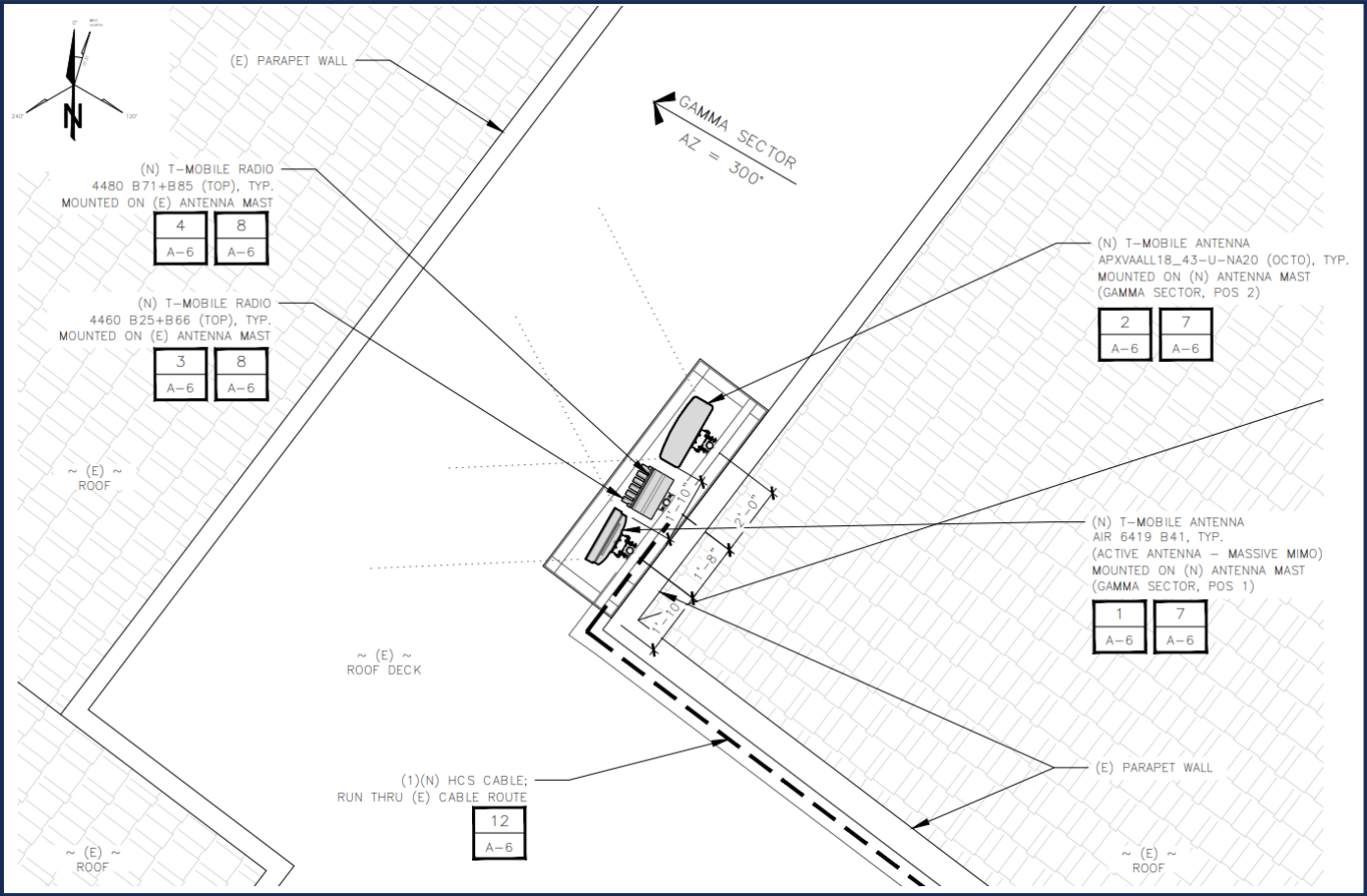
Proposed Antenna and Equipment Plan



Proposed Antenna Plan - Alpha & Beta Sectors



Proposed Antenna Plan – Gama Sector



Elevations

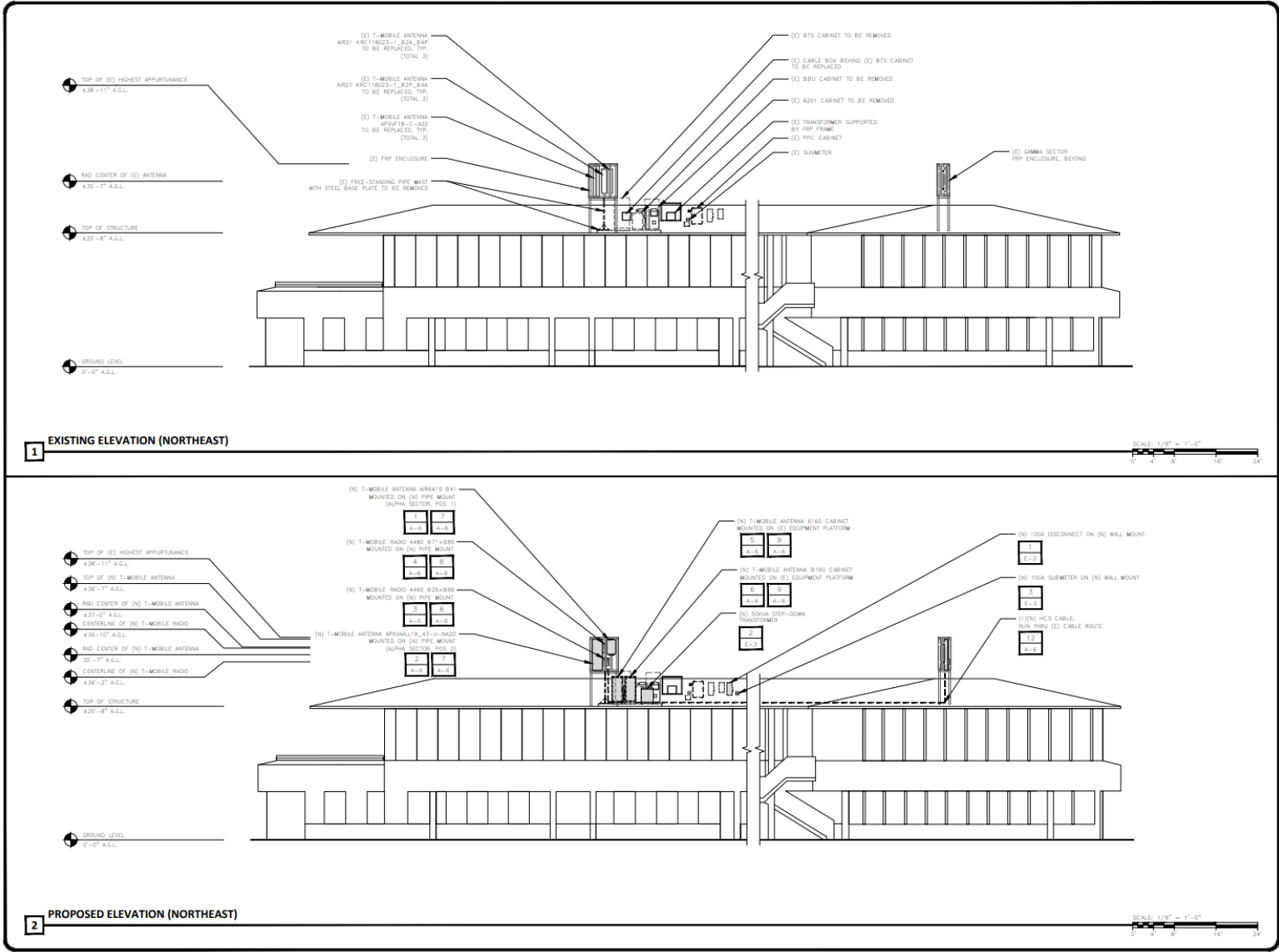


Photo Simulations

