

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

**DATE:** September 18, 2025

**TO:** Zoning Hearing Officer

**FROM:** Planning Staff

**SUBJECT:** Consideration of a Use Permit Renewal, pursuant to Sections 8.280 and 8.376.030.VI of the San Mateo County Zoning Regulations, to allow the continued use of an existing telecommunications facility operated by T-Mobile. The project is located in the public right-of-way adjacent to 2015 Edgewood Road, Redwood City in the unincorporated Emerald Lake Hills area of San Mateo County.

County File Number: PLN2000-00521 (T-Mobile)

**PROPOSAL**

The project applicant, Crystal Shea on behalf of T-Mobile, is proposing to renew an existing Use Permit (PLN2000-00521) to allow the continued use of a wireless telecommunication facility. The facility consists of two antennas, one equipment cabinet, one fiber cabinet, one telco box, one electrical meter, one T-Mobile powerwave box, and one T-Mobile 6502 equipment box mounted to an existing wood utility pole. The antennas and associated equipment are painted brown to match the wood pole. No changes are proposed to the existing approved facility under this renewal.

**RECOMMENDATION**

That the Zoning Hearing Officer approve the Use Permit Renewal, County File No. PLN2002-00521, by making the required findings and adopting the conditions of approval listed in Attachment A.

**BACKGROUND**

Report Prepared By: Robby Miller, Project Planner; [miller@smcgov.org](mailto:miller@smcgov.org)

Applicant: Crystal Shea, on behalf of T-Mobile

Owner: County of San Mateo; Pole: Northern California Joint Pole Association

Public Notification: Ten-day advanced notification for the hearing was mailed to property owners within 300 feet of the project parcel and a notice for the hearing posted in the San Mateo County Times on September 6, 2025.

Location: Public right-of-way adjacent to 2015 Edgewood Road, Redwood City

APN: Adjacent to 057-040-050

Existing Zoning: RH/DR (Residential Hillside District/Design Review District)

General Plan Designation: Residential, Low Density Residential

Sphere-of-Influence: Redwood City

Existing Land Use: Public Utility/Improved Road Shoulder

Flood Zone: FEMA Flood Zone X (Area of Minimal Flood Hazard), FEMA Panel No. 06081C0282E, dated October 16, 2012.

Environmental Evaluation: The project is categorically exempt pursuant to Section 15301, Class 1, of the California Environmental Quality Act (CEQA) Guidelines for the continued operation of existing public or private facilities involving little or no physical changes or expansion of use.

Setting: The project site is located on the unimproved portion of the public right-of-way in front of 2015 Edgewood Road. The site is located on the southern edge of Edgewood Road, a County Scenic Corridor, and slopes gently upward toward the east. The site is surrounded by a number of large evergreen trees and shrubs. The area in the vicinity of the project site is developed with single-family residences.

Chronology:

<u>Date</u>	<u>Action</u>
October 5, 2000	- Use Permit approved by the Zoning Hearing Officer for the telecommunications facility (PLN2000-00521).
April 20, 2006	- Zoning Hearing Officer renewed the Use Permit at a public hearing.
June 6, 2013	- Zoning Hearing Officer renewed the Use Permit at a public hearing.
April 2, 2025	- Subject application for a Use Permit Renewal initiated.
May 29, 2025	- Subject application deemed complete.

## DISCUSSION

### A. KEY ISSUES

#### 1. Conformance with the San Mateo County General Plan

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

##### a. Chapter 4 – Visual Quality

Policy 4.21 (*Utility Structures*), requires minimization of visual impacts generated by utility structures. As constructed, the project has a negligible visual impact. The antennas and equipment are relatively small in size and are painted brown to match the utility pole and surrounding natural environment. Planning Division Condition of Approval number two of the original Use Permit requires that the equipment be painted an earth tone. Based on the applicants photographs submitted for the subject application, the antennae and equipment paint color has been maintained in this way and effective for minimizing visibility. The existing facility has not resulted in significant visual impacts and no changes are proposed under the subject renewal.

##### b. Chapter 7 – General Land Use

The project is consistent with Policy 7.16 (*Land Use Objectives for Urban Areas*), maximization of efficiency of public facilities, services, and utilities, because this facility allows for the continued use of two compatible uses, and it reduces the need to introduce new telecommunication facilities along this County Scenic Corridor.

#### 2. Conformance with Wireless Telecommunications Facilities Regulations

Staff has determined that the project complies with the applicable standards of the Wireless Telecommunication Facilities (WTF) Ordinance, as discussed below:

##### a. Development and Design Standards.

**Section 8.376.030(II)(A)** generally prohibits new facilities in areas with sensitive habitats. The project site lease area does not contain any rare or endangered animal or plant species identified on the California Natural Diversity Database (CNDDDB). This application is for the

renewal of an existing facility. There is no new construction or modification being proposed.

**Section 8.376.030(II)(B)** discourages locating telecommunications facilities in residential zones unless no other locations provide feasible service or adequate capacity or coverage. This application is for the renewal of an existing facility. There is no new construction or modification being proposed.

**Section 8.376.030(II)(C)** requires that co-locations be investigated as an alternative to a new facility if it can provide equivalent coverage with less environmental impact. **Section 8.376.030(II)(D)** states that, except in cases where aesthetically inappropriate, new facilities should be constructed to support co-location. The project conforms to these standards because it does not involve any new construction and is not considered a new facility. Removing this facility and locating the antennas onto another facility would be an inferior option because this facility already exists and has a negligible visual impact. An alternative facility could increase the visual impact to adjacent areas.

**Section 8.376.030(II) (E - G)** seeks to minimize and mitigate visual impacts from public views by designing facilities to blend in with the surrounding environment, maintaining exterior equipment to blend with the surrounding environment and/or buildings and requiring facilities to be constructed of non-reflective materials.

Based on the applicant's photographs submitted with this application, the existing brown paint on the antennas and equipment is in good condition and continues to provide an integrated look with its surroundings that is non-reflective. Additionally, no physical changes to the facility are proposed with the renewal.

**Section 8.376.030(II)(H)** discusses wireless telecommunication facilities complying with requirements of the underlying zoning district, including, but not limited to setbacks, Design Review in the DR districts, Scenic Corridors, etc. The facility is not within a private parcel subject to setbacks. This application is for the renewal of an existing facility. There is no new construction or modification being proposed.

**Section 8.376.030(II)(I- K)** discusses wireless telecommunication facilities complying with allowed height and accessory buildings related to the facility. This application is for the renewal of an existing facility. There is no new construction or modification being proposed.

b. Performance Standards

The project meets the required performance standards of Section **8.376.030(III)** for lighting, licensing, provision of a permanent power source, timely removal of the facilities, and visual resource protection. No physical changes to the facility are proposed with this renewal, the facility operates under licenses issued from both the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC), power for the facilities will continue to be provided by PG&E, visual impacts will continue to be minimal, and conditions of approval will require maintenance and/or removal of the facility when no longer in operation.

The facility is required to obtain and maintain all necessary licenses and registrations from the Federal Communications Commission (FCC), California Public Utilities Commission (CPUC), and any other applicable regulatory bodies. T-Mobile is also required to supply the Planning and Building Department with evidence of these licenses and registrations. If any license is ever revoked, T-Mobile is obligated to inform the Planning and Building Department of the revocation within 10 days of receiving such notice.

3. Conformance with Use Permit Findings

In order to approve this Use Permit renewal to allow the continued operation of this facility, the Zoning Hearing Officer must make the following findings:

- a. **That the establishment, maintenance and/or conducting of the use will not, under the circumstances of this particular case, be detrimental to the public welfare or injurious to property or improvements in the neighborhood.**

This application is for the renewal of an existing facility. There is no construction or modification being proposed. Staff has reviewed the project files, online permit history, reviewed previous conditions of approval, and found no letters in the project file concerning non-compliance with Planning Department requirements or concerns with the existing facility from neighboring parcels in the vicinity. The cell facility has been in place for a significant period and, therefore, there will be no increase in visual impact, or other significant impacts caused by the continuance of this facility.

- b. **That this personal telecommunications facility is necessary for the public health, safety, convenience, or welfare of the community.**

This project will continue to provide the clarity, range, and capacity for the existing cellular network in the area and will continue to provide service for the public in general. A cellular facility in this location is necessary for the convenience of cellular users and will not be detrimental to the public welfare.

4. Conformance with Conditions of Last Use Permit Approvals

Staff has reviewed the previous Use Permit conditions of approval, last approved and modified with Use Permit Renewal on June 6, 2013, and has determined that the commercial carrier is in compliance with all previous conditions (see Attachment D). No physical changes are proposed as part of the renewal. Previous conditions that remain relevant, along with new conditions, are included in Attachment A of this staff report.

B. ENVIRONMENTAL REVIEW

The proposed telecommunications facility is categorically exempt from the California Environmental Quality Act (CEQA) under the provision of Section 15301, Class 1, for the continued operation of existing public or private facilities involving no physical changes or expansion in use.

C. REVIEWING AGENCIES

County Building Inspection Section  
San Mateo County Fire  
County Department of Public Works

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Site Plan
- C. Site Photos
- D. PLN2000-00521 Conditions from the 2013 Use Permit Renewal Approval

County of San Mateo  
Planning and Building Department

**RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL**

Permit or Project File Number: PLN2000-00521      Hearing Date: September 18, 2025

Prepared By: Robby Miller, Project Planner      For Adoption By: Zoning Hearing Officer

**RECOMMENDED FINDINGS**

For the Environmental Review, Find:

1. That the project is categorically exempt from the California Environmental Quality Act (CEQA) under the provisions of Section 15301, Class 1, for the continued operation of existing public or private facilities involving no additional physical changes and no expansion of use.

For the Use Permit Renewal, Find:

2. That the establishment, maintenance and/or conducting of the proposed use will not, under the circumstances of this particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood as a search of County records has shown that the site has operated in full compliance with the previous conditions of approval, is in compliance with the Federal Communications Commission (FCC)'s current prevailing standards for limiting human exposure to RF energy, and is compliant with the County's Wireless Telecommunication Facilities Ordinance due to the design, location, and available opportunities for future co-locations.
3. That the approval of this Use Permit renewal for an existing cellular telecommunication facility is necessary for the public health, safety, convenience, or welfare of the community as the site provides telecommunications coverage to the surrounding community, which serves as a benefit to both private and public users.

## **RECOMMENDED CONDITIONS OF APPROVAL**

### **Current Planning Section**

1. This approval applies only to the proposal, documents, and plans described in this report, and submitted to and approved by the Zoning Hearing Officer on September 18, 2025. Modifications beyond those approved by the Zoning Hearing Officer may be subject to review and approval by the Director of Planning and Building and may require review at a public hearing. Minor modifications that are largely consistent with this approval may be approved at the discretion of the Director of Planning and Building.
2. This permit shall be valid for 10 years from the date of this approval and shall expire on September 18, 2035. If continuation of this use is desired, the applicant shall file a Use Permit renewal application six months prior to its expiration with the Planning and Building Department, by submitting the applicable application forms and paying the application fees.
3. Any modification to this facility or changes in use or intensity may require a Use Permit amendment. If an amendment is requested, the applicant shall submit necessary documents and fees for consideration at a public hearing.
4. The facility shall remain painted a brown color that matches the color of the utility pole on which it is mounted. The facility shall be repainted when necessary.
5. The applicant shall not enter into a contract with the landowner or lessee which reserves for one company exclusive use of the utility pole for telecommunication facilities.
6. This installation shall be removed in its entirety at that time when this technology becomes obsolete, when the facility is no longer needed to achieve coverage objectives, or if the facility remains inactive for six consecutive months. If any of these circumstances occur, the entire facility, including all antennas and associated equipment, etc., shall be removed and the site shall be returned to its pre-construction state to the extent practicable.
7. Noise sources associated with demolition, construction, repair, remodeling, or grading of any real property shall be limited to the hours from 7:00 a.m. to 6:00 p.m. weekdays, and 9:00 a.m. to 5:00 p.m. on Saturdays. Said activities are prohibited on Sundays, Thanksgiving, and Christmas (San Mateo County Ordinance Code Section 4.88.360).
8. The applicant shall maintain all necessary licenses and registrations from the Federal Communications Commission (FCC) and any other applicable regulatory bodies for the operation of the subject facility at this site. The applicant shall supply the Planning Department with evidence of such licenses and registrations.

If any required license is ever revoked, the applicant shall inform the Planning Department of the revocation within 10 days of receiving notice of such revocation.

9. The facility shall maintain compliance with the performance standards contained with the County's Wireless Telecommunication Facilities Ordinance.



**NOTE:**  
 THESE DRAWINGS HAVE BEEN CREATED BY INFORMATION GATHERED FROM (E) AS-BUILTS PROVIDED BY T-MOBILE AND WITHOUT A SURVEY. PLEASE VERIFY IN FIELD ALL DIMENSIONS, LENGTHS, PROPERTY LINES AND CONDUIT RUNS.



PROJECT INFORMATION:  
 (CUP RENEWAL)  
**SF03125A**  
**SF125 EDGEWOOD JP**  
 NEAR 2015 EDGEWOOD RD.,  
 REDWOOD CITY, CA 94062  
 SAN MATEO COUNTY

CURRENT ISSUE DATE:  
 12/18/24

ISSUED FOR:  
**ZONING**

REV.:	DATE:	DESCRIPTION:	BY:
0	12/18/24	100% ZD	VTA

PLANS PREPARED BY:  
**NETWORK CONNEX**  
 655 N. CENTRAL AVE., #1520  
 GLENDALE, CA 91203  
 OFFICE: (818) 840-0808 FAX: (818) 840-0708

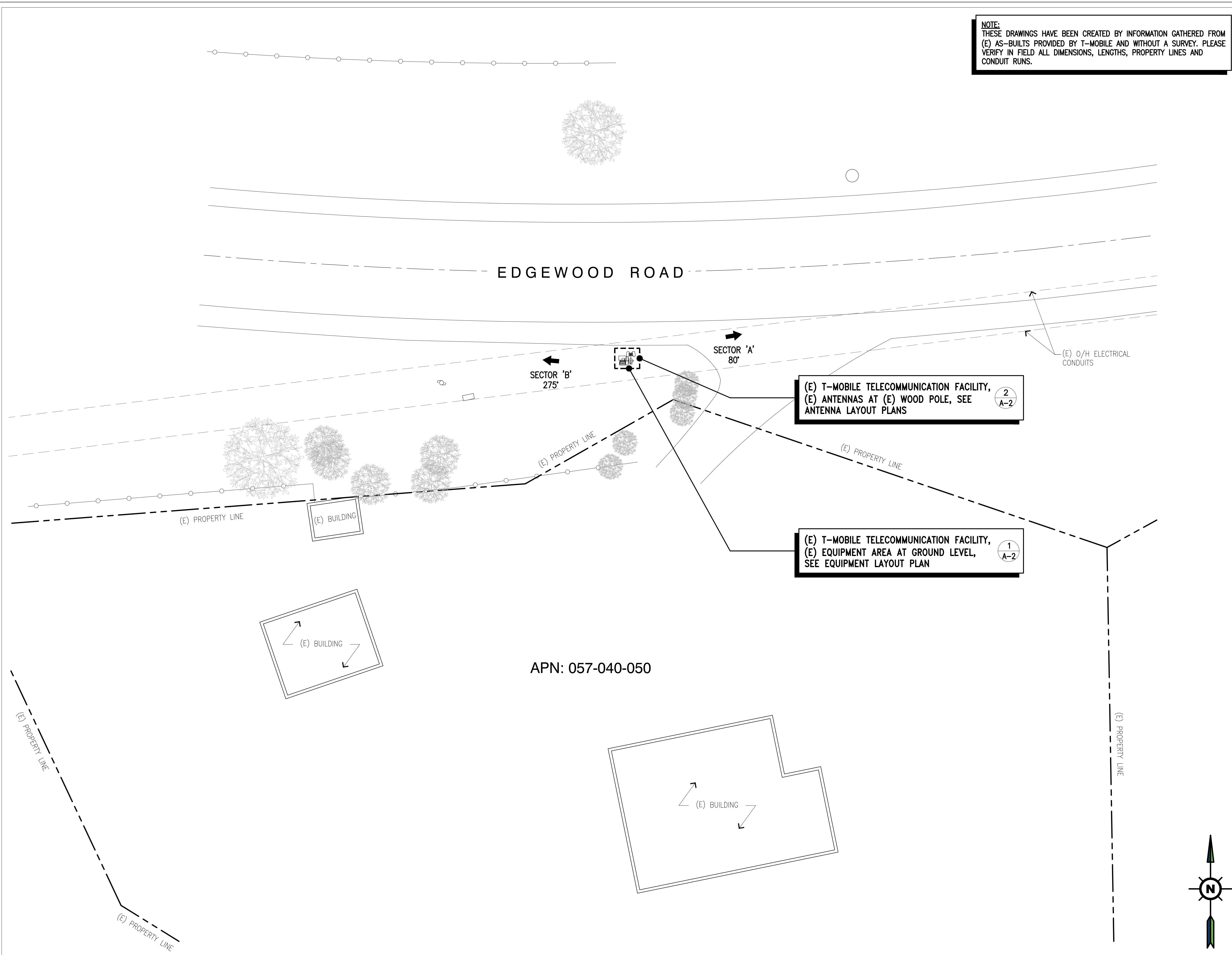
CONSULTANT:  
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DRAWN BY: VTA    CHK.: LMC    APV.: LMC

LICENSURE:

SHEET TITLE:  
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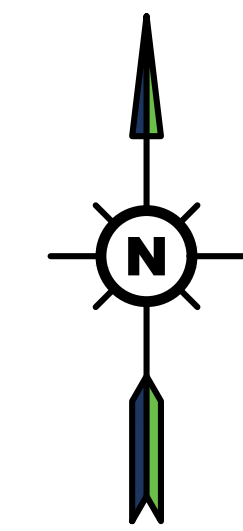
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 SF03125A



APN: 057-040-050

EXISTING OVERALL SITE PLAN

SCALE: 1"=10'-0"    0    5'    10'    20'    1



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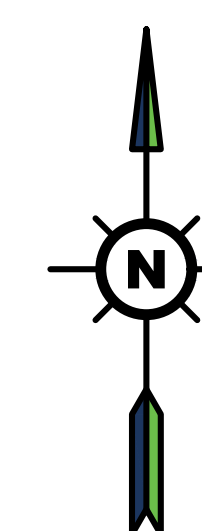
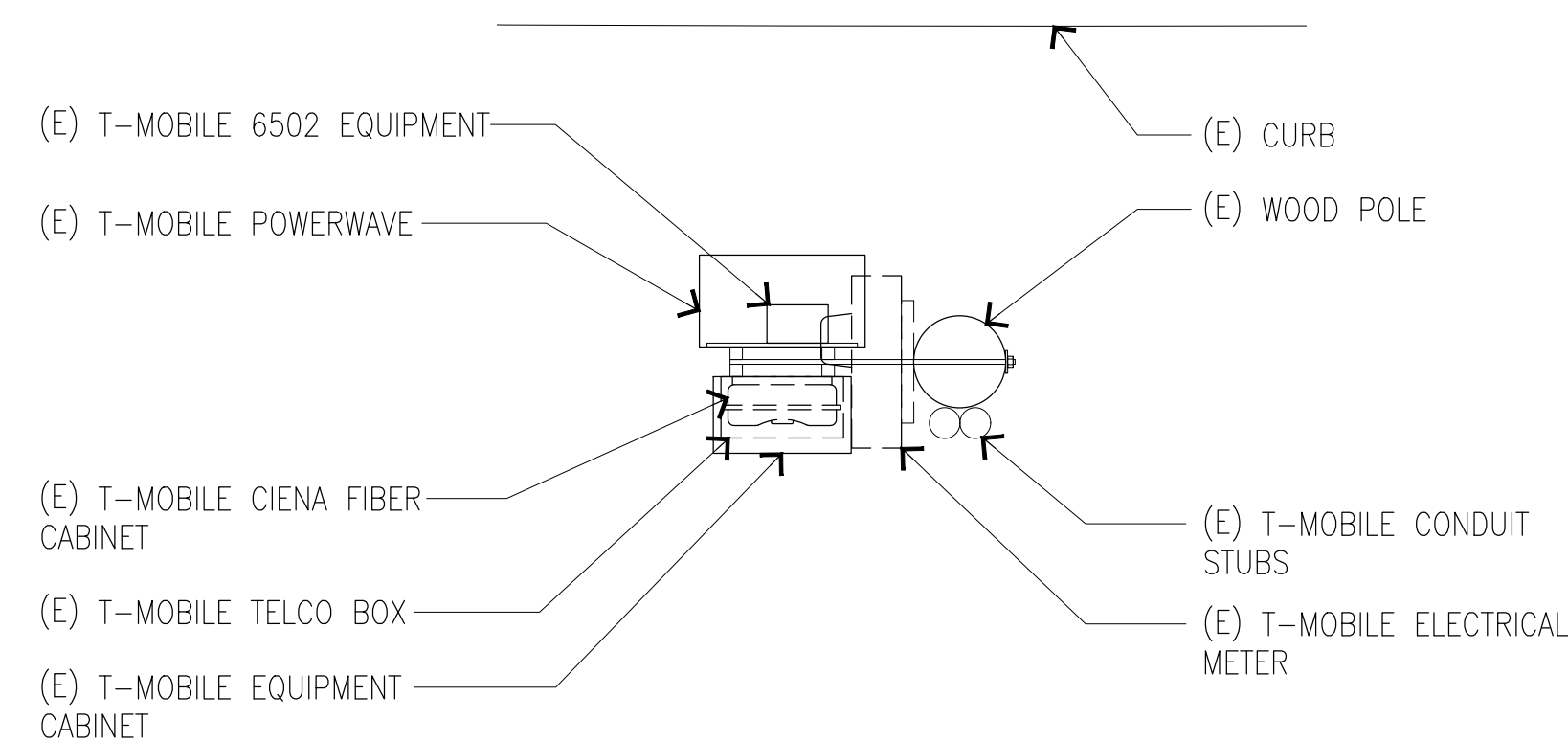
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EXISTING EQUIPMENT AND  
ANTENNA LAYOUT PLANS

SHEET NUMBER: REVISION:

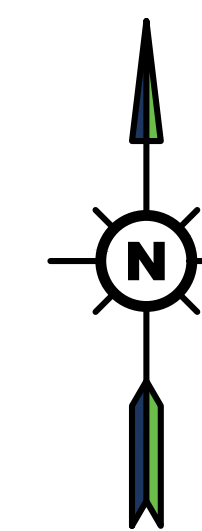
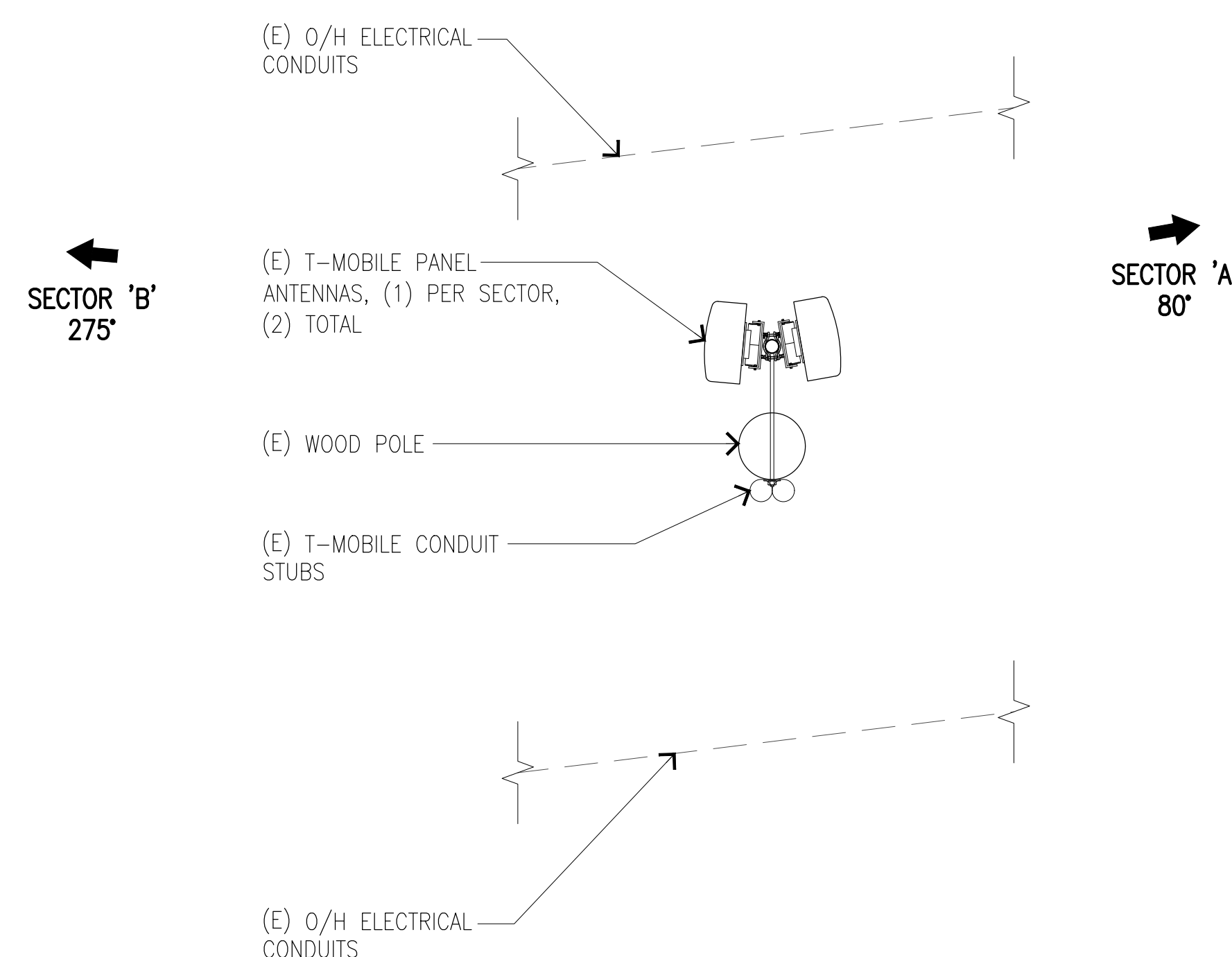
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EDGEWOOD ROAD



EXISTING EQUIPMENT LAYOUT PLAN

SCALE: 1/2"=1'-0" 0 1' 2' 4' 1



EXISTING ANTENNA LAYOUT PLAN

SCALE: 1/2"=1'-0" 0 1' 2' 4' 2

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SF03125A  
SF125 EDGEWOOD JP

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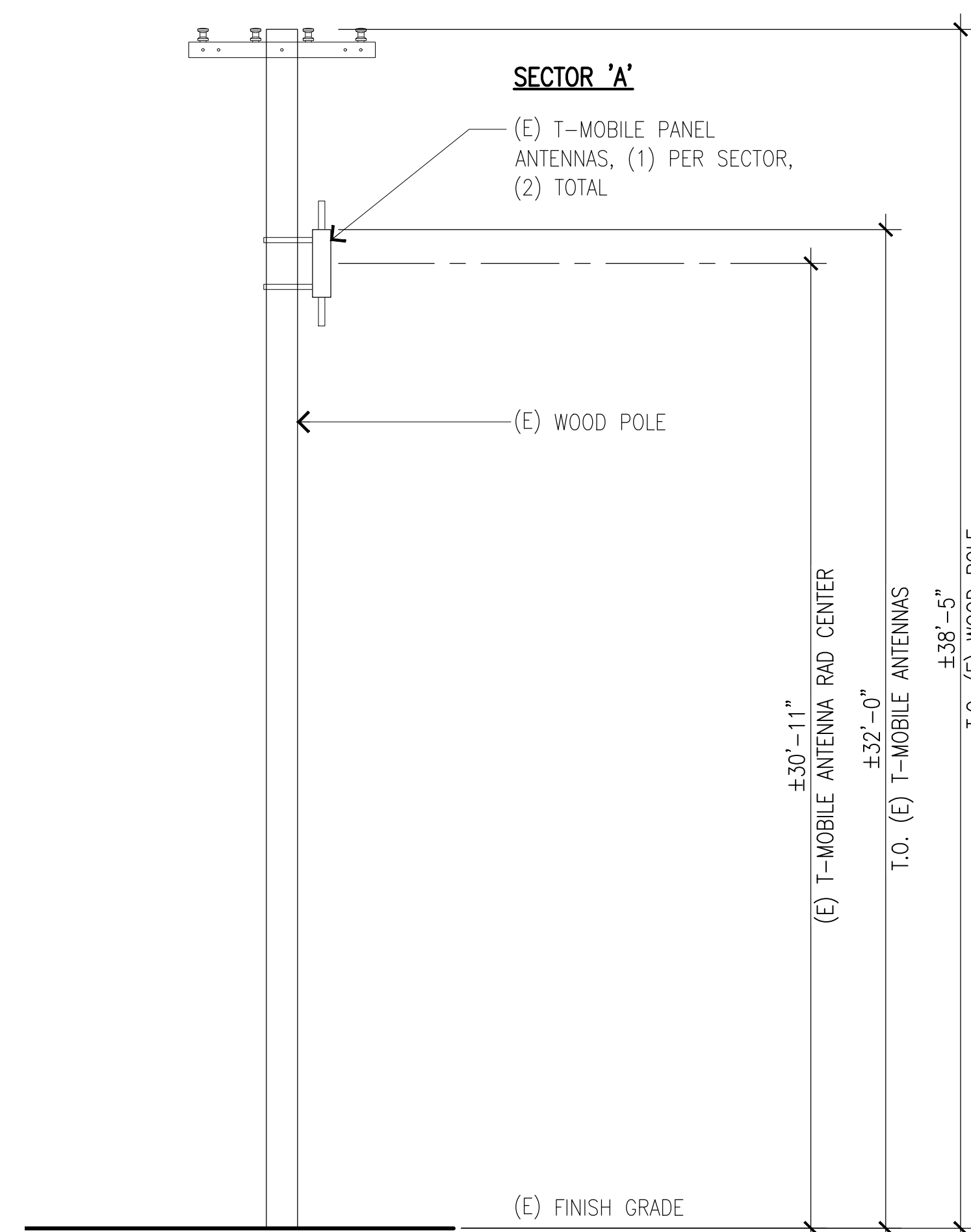
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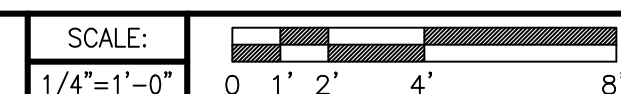
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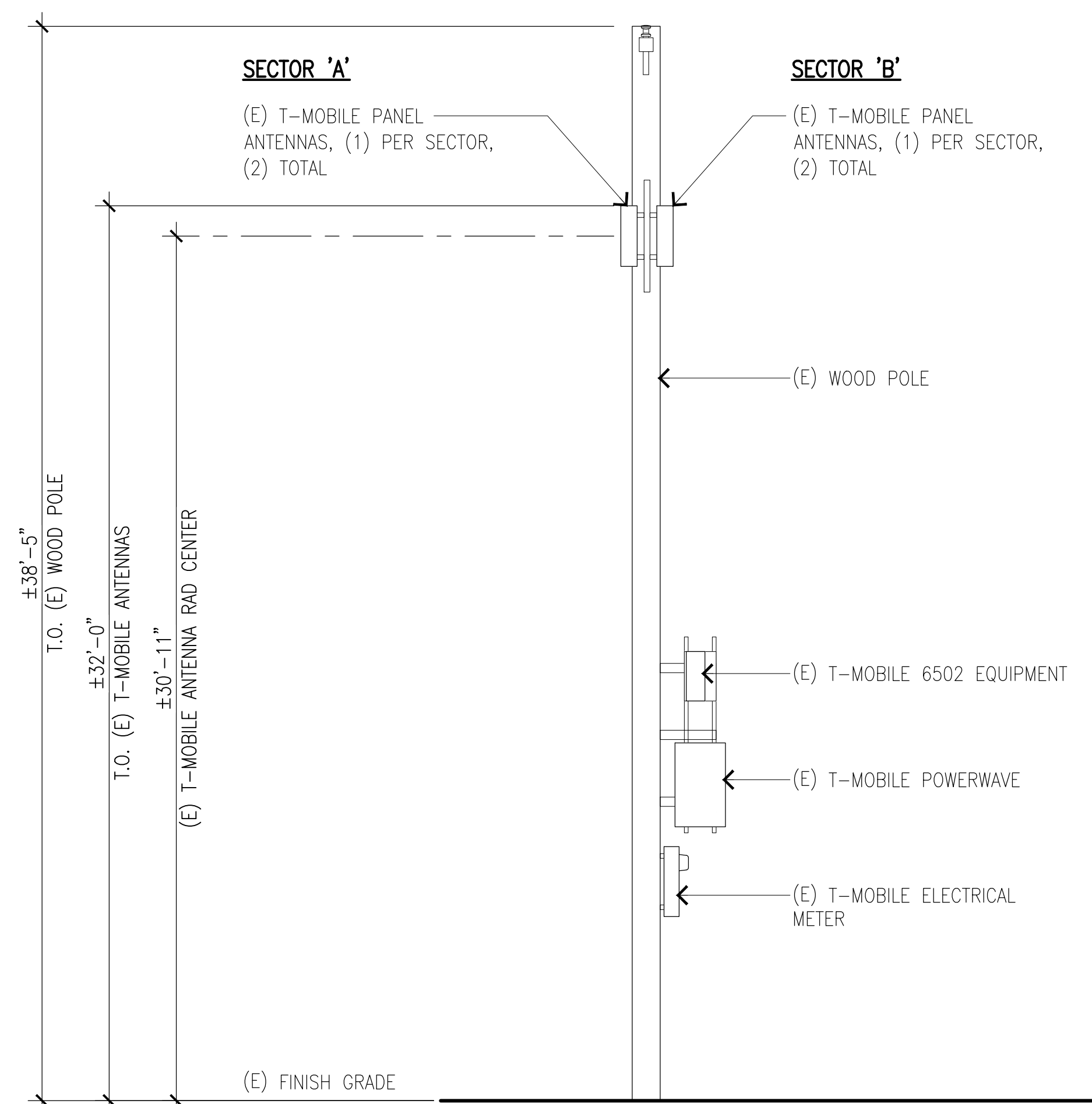
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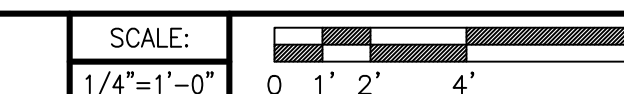
EXISTING EAST ELEVATION



2



EXISTING NORTH ELEVATION



1

PROJECT INFORMATION:

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NEAR 2015 EDGEWOOD RD.,  
REDWOOD CITY, CA 94062  
SAN MATEO COUNTY

CURRENT ISSUE DATE:

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ISSUED FOR:

**ZONING**

REV.: DATE: DESCRIPTION: BY:

REV.	DATE	DESCRIPTION	BY
0	12/18/24	100% ZD	VTA

PLANS PREPARED BY:

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VTA LMC LMC

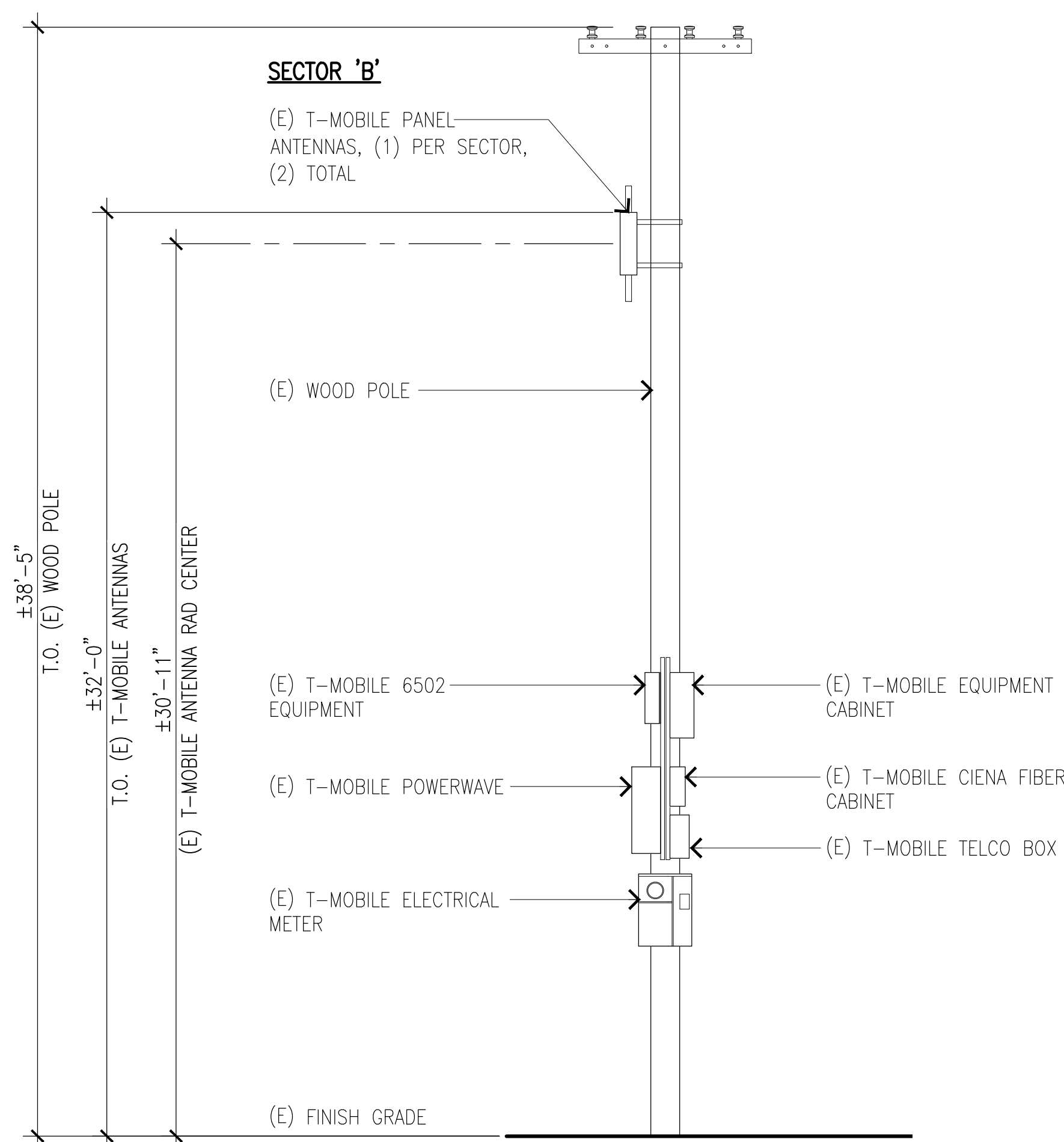
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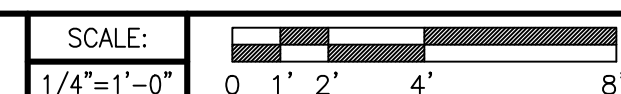
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SF03125A

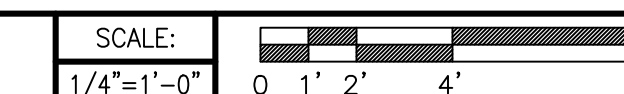
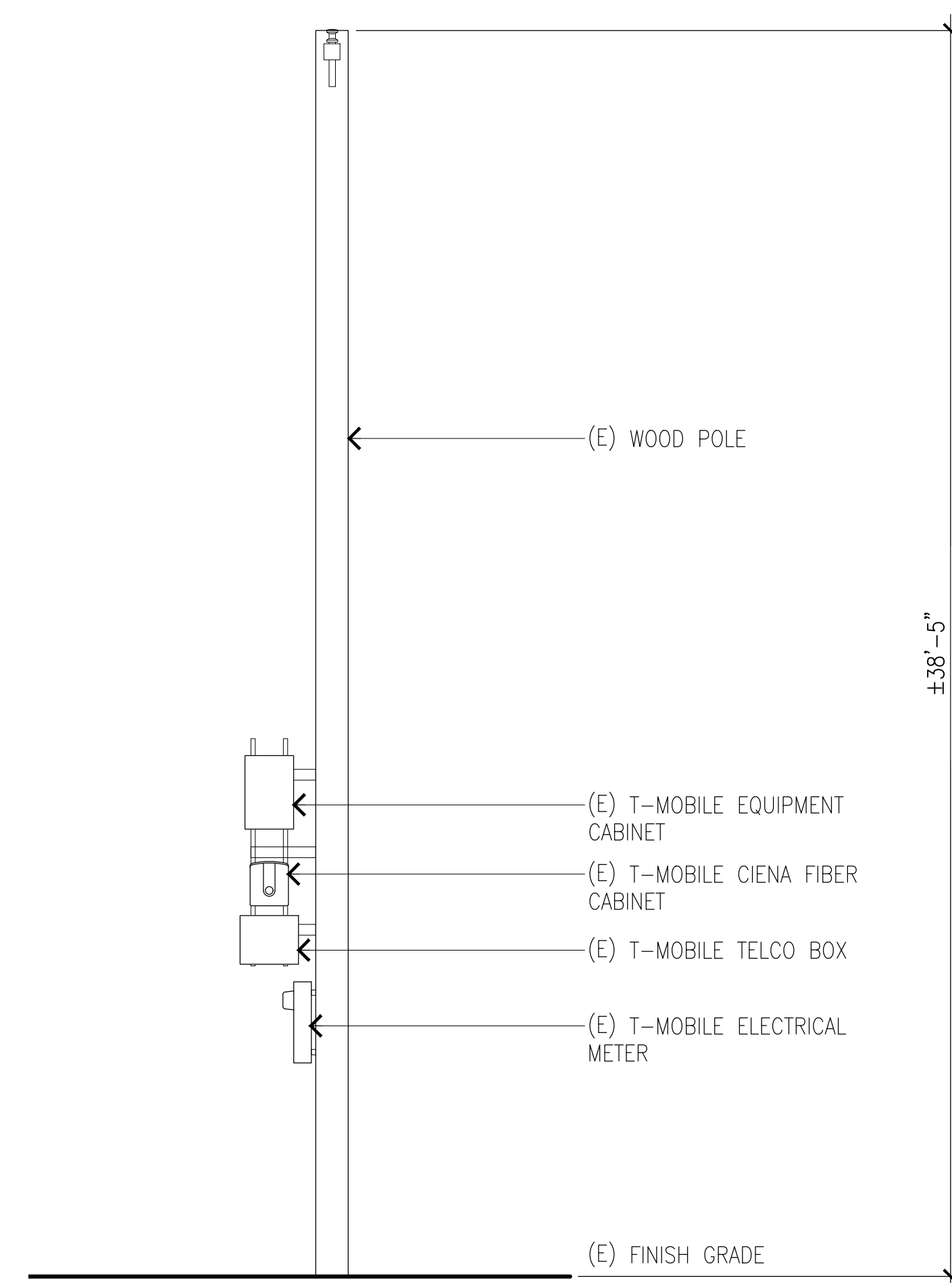


EXISTING WEST ELEVATION



2

EXISTING SOUTH ELEVATION



1



Tuesday, November 26, 2024  
9:13:59am

9:13:59 EST



Tuesday, November 26, 2024  
9:14:37am

9:14:37 EST



Tuesday, November 26, 2024  
9:14:48am

9:14:48 EST

## Attachment A

County of San Mateo  
Planning and Building Department**FINDINGS AND CONDITIONS OF APPROVAL**

Permit or Project File Number: PLN 2000-00521

Hearing Date: June 6, 2013

Prepared By: Steven Rosen Project Planner

Adopted By: Zoning Hearing Officer

**FINDINGS****For the Environmental Review, Found:**

1. That the proposed project is categorically exempt from the California Environmental Quality Act (CEQA) under Section 15301 (Class 1), Subsection (b): existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services.

**For the Use Permit, Found:**

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, because it has been in place for a significant period and, therefore, there will be no increase in visual impact or other impacts caused by the continuance of this facility.
3. That the approval of this use permit renewal for a cellular telecommunication facility is necessary for the public health, safety, convenience or welfare, because the facility will continue to provide the clarity, range and capacity for the existing cellular network in the area and will continue to provide service for the public in general. A cellular facility in this location is necessary for the convenience of cellular users and will not be detrimental to the public welfare.

**CONDITIONS OF APPROVAL****Current Planning Section**

1. This approval applies only to the proposal as described in this report, and the plans and documents submitted to the Planning Department on February 1, 2012. Minor adjustments to the project in the course of applying for building permits may be approved by the Community Development Director if they are consistent with the intent of and in substantial conformance with this approval.
2. The facility shall remain painted a brown color that matches the color of the utility pole on which it is mounted. The facility shall be repainted when necessary.
3. This use permit shall be valid for a period of ten years following this date of approval, expiring on June 6, 2023. If the applicant wishes to renew this use permit, the application for permit renewal must be submitted to the Planning and Building Department six months prior to expiration of this permit and shall be accompanied by the renewal application and fee applicable at that time.

There shall be an administrative review for compliance with conditions of approval of this use permit in June 2018.

4. The installation shall be removed in its entirety at that time when this technology becomes obsolete or this facility is no longer needed, in no case longer than 90 days.
5. The applicant shall not enter into a contract with the landowner or lessee which reserves for one company exclusive use of the utility pole for telecommunication facilities.
6. This approval applies exclusively to the continuation of an existing facility. If any changes to the facility are proposed in the future, use permit amendment is necessary. If the applicant wishes to amend their permit, they shall submit for a use permit amendment with applicable fees at time of application to the Planning and Building Department and obtain all necessary approvals prior to any modifications or construction.