

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

**DATE:** April 2, 2026

**TO:** Zoning Hearing Officer

**FROM:** Planning Staff

**SUBJECT:** Consideration of a Use Permit, pursuant to Chapters 8.376 and 8.280 of the San Mateo County Ordinance Code, to install a new wireless radio and antenna facility, along with associated equipment on a new utility pole consisting of three 5G radios and antennas, one 4G radio, and one 4G antenna.

County File Number: PLN2025-00040 (Verizon)

**PROPOSAL**

The applicant, Verizon Wireless, is requesting a Use Permit to allow the installation of a new wireless telecommunications facility near 401 Seventh Avenue in the North Fair Oaks neighborhood, an unincorporated area of San Mateo County. The proposed facility will be mounted on an existing utility pole owned by Pacific Gas and Electric Company (PG&E) and will include associated equipment consisting of a fiber panel, a power disconnect switch, a 60-amp CT-rated smart pole meter, and two 2-inch risers to accommodate fiber and power connections. Construction activities will involve excavation and trenching to install underground fiber and electrical lines as part of the project. The site is located along a traffic-calmed section of Seventh Avenue and is adjacent to both multi-family residential development and single-family homes. Consistent with Chapter 8.376.030(I) of the Ordinance Code, a Use Permit is required for the construction and installation of all new wireless telecommunication facilities.

**RECOMMENDATION**

That the Zoning Hearing Officer approve the Use Permit, PLN2025-00040, by making the required findings and adopting the conditions of approval listed in Attachment A.

**BACKGROUND**

Report Prepared By: Randall Cohen, Project Planner, [rcohen@smcgov.org](mailto:rcohen@smcgov.org)

Applicant: Crown Castle Fiber LLC (for Verizon Wireless)

Owner: County of San Mateo

Public Notification: Ten-day advanced notification for the hearing was mailed to property owners within 300 feet of the project parcel.

Location: Public Right of Way adjacent to 401 Seventh Avenue, Menlo Park

APN: Public Right of Way adjacent to 060-073-440

Size: Located on the sidewalk within the right-of-way

Existing Zoning: NMU/DR (Neighborhood Mixed Use / Design Review)

General Plan Designation: Medium Density / Neighborhood Mixed Use

Sphere-of-Influence: Redwood City

Existing Land Use: Existing wooden power pole located within the sidewalk near 401 Seventh Avenue.

Water Supply: California Water Supply - Bear Gulch Division

Sewage Disposal: Fair Oaks Sewer District

Flood Zone: Flood Zone "X" Area of Minimal Flood Hazard, FEMA Firm Panel 06081C0302E, Effective Date: 10/16/2012.

Environmental Evaluation: This project is categorically exempt under the provisions of Class 3, Section 15303 of the California Environmental Quality Act (CEQA) Guidelines for the construction of new small structures and the installation of small new equipment in small structures. The telecommunications facility, including the tower and all equipment, will occupy approximately 5 sq.ft. of area on the ground. The project will meet all Federal Communications Commission (FCC) guidelines for the emission of radio frequencies qualifying for the Class 3 exemption.

Setting: The project is near 401 Seventh Avenue in the North Fair Oaks Neighborhood, an unincorporated area of San Mateo County. The site is adjacent to both multi-family and single-family residences located within the Neighborhood Mixed Use / Design Review District along a traffic-calming section of Seventh Avenue. The proposed facility will utilize a utility pole owned by Pacific Gas and Electric Company (PG&E).

Chronology:

<u>Date</u>	<u>Action</u>
February 25, 2025	- Application for a Use Permit received to operate a new cellular facility.
February 28, 2025	- All fees paid, project deemed complete.
June 19, 2025	- North Fair Oaks Community Council Meeting. Continuation requested as members sought additional clarification from Applicant regarding; alternative sites considered for co-location, clarification on the public outreach process, and radio frequency output. Members shared concerns about the location as the site is at the boundary of a residential neighborhood.
February 26, 2026	- The applicant returned to the North Fair Oaks Community Council with a revised proposal that included increased antenna elevations intended to address community concerns regarding radio frequency (RF) emissions. During the meeting, the applicant explained that the facility is designed to off-load existing network traffic and provide an in-fill opportunity to improve telecommunications service in an area currently experiencing insufficient coverage. Following discussion, Council members voted on the proposal; however, the vote resulted in a tie, thereby rendering a “ <i>No recommendation</i> ” to the Zoning Hearing Officer.
April 2, 2026	- Zoning Hearing Officer Meeting.

**DISCUSSION**

A. KEY ISSUES

1. Compliance with the General Plan

Staff has determined that the project complies with all applicable County General Plan policies, specifically:

Visual Quality Policies

Policy 4.21 (*Utility Structures*) seeks to minimize the adverse visual impact of utility structures. The tower’s antennas will be obscured by shielding that is painted in colors similar to that found on utility poles in the neighborhood.

2. Compliance with Zoning Regulations

The project is located in the unincorporated area of North Fair Oaks in San Mateo County and is zoned Neighborhood Mixed Use / Design Review. The project complies with the NMU/DR standards as discussed below.

Development Standards

The proposed project site is located within the public ROW in the NMU/DR Zoning District. Zoning district standards, with the exception of height, are not applicable to projects located within the public right-of-way. The maximum height allowed in the NMU Zoning District is 45 feet. The proposed project will add approximately 17 feet, 7 inches to the existing utility pole to exceed the maximum height allowed in said Zoning District.

General Order No. 95 (GO-95), mandated by the California Public Utilities Commission, requires a 6-foot vertical separation between all cellular antennas and the nearest adjacent power supply lines and a 2-foot vertical separation from communication conductors and equipment. The applicant has proposed extending the height of the utility pole to comply with the State-required 6-foot and 2-foot safety separation distance mandates.

3. Compliance with Wireless Telecommunication Facilities Ordinance

Staff has determined that the project complies with applicable standards of the Wireless Telecommunications Facilities regulations, Chapter 8.376 of the San Mateo County Ordinance Code, as discussed below:

Development and Design Standards (Chapter 8.376.030.II)

- a. **New wireless telecommunication facilities shall be prohibited in a Sensitive Habitat, as defined by Policy 1.8 of the General Plan (*Definition of Sensitive Habitats*) for facilities proposed outside of the Coastal Zone, and by Policy 7.1 of the Local Coastal Program (*Definition of Sensitive Habitats*) for facilities proposed in the Coastal Zone, except when all of the following written findings are made by the reviewing authority: (1) There is no other feasible location(s) in the area; and (2) There is no alternative facility configuration that would avoid impacts to environmentally sensitive habitat areas; and (3) Prohibiting such facility would be inconsistent with federal law; and (4) Adverse impacts to the sensitive habitat are minimized to the maximum extent feasible; and (5) Unavoidable impacts are mitigated so that there is no loss in habitat quantity or biological productivity.**

No sensitive habitat is present at this location as the environment is completely urbanized and located within the North Fair Oaks Neighborhood.

- b. **New wireless telecommunication facilities shall not be located in areas zoned Residential (R), unless the applicant demonstrates, by a preponderance of the evidence, that a review has been conducted of other options, and no other sites or combination of sites allows feasible service or adequate capacity and coverage. This review shall include, but is not limited to, identification of alternative site(s) within 2.5 miles of the proposed facility. See Section 8.376.030(V) for additional application requirements.**

This proposed cell site will be located on an existing joint utility pole in the public ROW within the NMU/DR district. Small cell technology requires sites to be much closer together than larger macro sites. These sites are not meant to increase the coverage of an area but to assist with unloading traffic from the macro site network to provide increased data speeds and decrease dropped calls for the surrounding residences and transient traffic. As such, small cell facilities are frequently located in residential neighborhoods where data traffic is high.

Additionally, although the County's WTF Ordinance requires applicants to demonstrate the need for wireless facilities through the submittal of propagation maps and alternative analyses, wireless providers have a State-mandated right to place their facilities in the public ROW (California Public Utilities Code Section 7901), and recent legal developments indicate that wireless providers are not required to consider alternatives outside of the ROW, nor prove the need for their facilities when they are located in the right-of-way. Consequently, the County's ability to request further information demonstrating the need for proposed facilities in the public ROW is limited.

- c. **New wireless telecommunication facilities shall not be located in areas where co-location on existing facilities would provide equivalent coverage with less environmental impact.**

The small cell technology proposed by the applicant is the least environmentally impactful wireless technology currently available. As small cell technology requires sites to be located in close proximity to one another and closer to targeted service areas, small cell sites on macro cell towers (which are often located far outside service areas) is often infeasible. As local jurisdictions cannot require wireless providers to locate outside of the right-of-way, an alternative locations analysis becomes a moot point. The applicant has indicated that the subject location is the best location to serve the identified target area.

- d. **Except where aesthetically inappropriate, new wireless telecommunication facilities must be constructed so as to accommodate co-location and must be made available for co-location unless technologically infeasible.**

Future co-locations would be technically feasible as long as the proposed facilities comply with GO-95 engineering requirements. As pole top-mounted facilities cannot accommodate additional wireless facilities in a manner that complies with both PG&E and GO-95 requirements, the applicant does not expect future co-locations given the equipment configuration of the utility poles.

- 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 his/her designee in instances where it would not be appropriate or necessary, such as in a commercial or industrial area.**

The proposed cellular facility will blend with the existing environment as many utility poles are located nearby carrying various utility services to customers. To mitigate the visual impact of the proposed project, the antennas and utility boxes shall be painted to match the existing utility pole.

- f. **Paint colors for the wireless telecommunication facility shall minimize its visual impact by blending with the surrounding environment and/or buildings. Prior to the issuance of a building permit, the applicant shall submit color samples for the wireless telecommunication facility. Paint colors shall be subject to the review and approval of the Planning and Building Department. Color verification shall occur in the field after the applicant has painted the equipment the approved color, but before the applicant schedules a final inspection.**

The proposed colors will be similar to already existing utility components located on similar poles nearby.

- g. The exteriors of wireless telecommunication facilities shall be constructed of non-reflective materials.**

The proposed colors are non-reflective and will be painted or coated with a non-reflective finish.

- 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 utility pole that will host the WTF is located in the NMU/DR zoning district in the public right-of-way. As discussed above, zoning district standards (with the exception of height) are not applicable to wireless facilities located in the right-of way.

- i. Except as otherwise provided below, ground-mounted towers, spires and similar structures may be built and used to a greater height than the limit established for the zoning district in which the structure is located; provided that no such exception shall cover, at any level, more than 15% in area of the lot nor have an area at the base greater than 1,600 sq. ft.; provided, further that no tower, spire or similar structure in any district shall ever exceed a maximum height of 150 feet.**

The wood utility pole will be 43 feet tall, with a max antenna height of 46 feet – 9 inches. The new facility complies with the requirements of the zoning district as discussed in Section A.2 above, with the exception of height. Upon securing the subject Use Permit, the proposed height will comply.

- j. In any Residential (R) district, ground-mounted towers, spires and similar structures may be built and used provided that they shall not cover, in combination with any accessory building(s), shelter(s), or cabinet(s) or other above-ground equipment used in support of the operation of the wireless telecommunication facility, more than 15% in area of the lot nor an area greater than 1,600 sq. ft. Buildings, shelters, and cabinets shall be grouped. Towers, spires, and poles shall also be grouped, to the extent feasible for the technology.**

The proposed cellular facility will occupy approximately 5 sq. ft. of area within the right of way in the NMU/ DR zoning district.

- k. Prohibits the installation of backup diesel generators unless the applicant can provide written documentation of why alternative energy sources such as solar is not feasible.**

The applicant has evaluated alternative energy sources for viability. **Natural Gas:** Natural Gas is not available at the proposed wireless telecommunications facility (WTF). **Electricity:** The WTF is not powered by backed up batteries. **Wind:** There are space constraints. Additionally, a windmill does not produce sufficient power to keep the WTF on air during an outage. **Solar:** There are space constraints for solar panels to adequately power the wireless telecommunications facility.

#### Performance Standards

The proposed project meets the required standards of Chapter 8.376.030.III (Performance Standards for New Wireless Telecommunication Facilities that are not Co-Location Facilities) for lighting, licensing, provision of a permanent power source, timely removal of the facility, and visual resource protection. There is no lighting proposed, proper licenses will be obtained from both the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC), and power for the facility will be provided by PG&E. Visual impacts will be minimal (see Attachment E) and conditions of approval will require ongoing maintenance and/or removal of the facility when it is no longer in operation. Access to the proposed project site is existing and no noise in excess of the limits established by the San Mateo County's Noise Ordinance will be produced.

#### 4. Compliance with Use Permit Findings

The applicant is seeking a Use Permit to construct a new wireless communications facility. The granting of a Use Permit is subject to the following findings:

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

The site of the telecommunications facility is in an existing urbanized area frequented by the public. The Radio Frequency Report by Waterford Consulting (dated November 13, 2025) shows that at the nearest walking/working surfaces, the public will be exposed to only 4.153% of the FCC's general public limit for RF radiation. The antennas are designed to direct energy toward the horizon and not the ground so exposure at ground level will not exceed maximum permissible exposure. Therefore, the installation of the new telecommunications facility will not be injurious to public welfare.

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

The telecommunications facility will provide service to the densely populated North Fair Oaks neighborhood and surrounding areas enabling communication access to emergency services, and thereby, enhancing public safety and welfare of the community.

**B. ENVIRONMENTAL REVIEW**

The project is categorically exempt under the provisions of Class 3, Section 15303 of the California Environmental Quality Act (CEQA) Guidelines for the construction of new, small structures and the installation of small new equipment in small structures. The telecommunications facility, including the tower and all equipment, will occupy approximately 5 square feet. The project will meet all FCC guidelines for the emission of radio frequencies. Therefore, the project qualifies for the Class 3 exemption.

**C. REVIEWING AGENCIES**

Menlo Park Fire Protection District  
San Mateo County Department of Public Works  
North Fair Oaks Community Council

**ATTACHMENTS**

- A. Recommended Findings and Conditions of Approval
- B. Location Map
- C. Site Plan / Elevations
- D. Photo Sims
- E. RF Report prepared by Waterford Consulting, dated February 5, 2025

County of San Mateo  
Planning and Building Department

**RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL**

Permit or Project File Number: PLN2025-00040

Hearing Date: April 2, 2026

Prepared By: Randall Cohen, Project Planner For Adoption By: Zoning Hearing Officer

**RECOMMENDED FINDINGS**

Regarding the Environmental Review, find:

1. That the project is categorically exempt under the provision of Class 3, Section 15303 of the California Environmental Quality Act (CEQA) Guidelines for the construction of new, small structures and the installation of small new equipment in small structures. The telecommunications facility, including the tower and all equipment, will occupy approximately 5 sq. ft. on the sidewalk within the right of way. The project will meet all FCC guidelines for the emission of radio frequencies. Therefore, the project qualifies for the Class 3 exemption.

Regarding the Use Permit, find:

2. That the establishment, maintenance, and/or conducting of the use will not, under the circumstances of the particular case, result in significant adverse impacts to the public welfare or injurious to property or improvements in said neighborhood.

The site of the telecommunications facility is in an existing urban area frequented by the public. The RF report (Waterford Consulting, November 13, 2025) shows that at the nearest walking/working surfaces, the public will be exposed to only 4.153 percent of the FCC's general public limit for RF radiation. The antennas are designed to direct energy toward the horizon and not the ground so exposure at ground level will not exceed maximum permissible exposure (MPE), however the telecommunications area will be secured inherently by elevation, and signs will be posted to control access to areas that may exceed maximum permissible exposure. Therefore, the installation of the new telecommunications facility will not be injurious to public welfare.

3. That this telecommunications facility is necessary for the public safety, convenience, and or welfare of the community.

The telecommunications facility will provide service to the North Fair Oaks community and surrounding areas enabling communication, wireless voice and data, enhancing public safety and welfare.

## **RECOMMENDED CONDITIONS OF APPROVAL**

### **Current Planning Section**

1. This approval applies only to the proposal as described in this report and materials submitted for review and approval by the Zoning Hearing Officer on April 16, 2026. Minor modifications to the project may be approved by the Director of Planning and Building if they are consistent with the intent of and in substantial conformance with this approval.
2. Any project changes or change in intensity of use may require an amendment to this Use Permit. Amendments not determined by the Director of Planning and Building to be minor, per Condition No. 1, will require an application for amendment, payment of applicable fees, and consideration at a public hearing.
3. This Use Permit shall be valid for 10 years, until April 16, 2036. If the applicant seeks to renew the Use Permit, renewal shall be applied for six months prior to the expiration to the Planning and Building Department and shall be accompanied by the renewal application, materials for renewal, and fee applicable at that time.
4. The property owner shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including, but not limited to, the following:
  - a. Delineation with field markers of clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses within the vicinity of areas to be disturbed by construction and/or grading.
  - b. Protection of adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
  - c. Performing clearing and earth-moving activities only during dry weather.
  - d. Stabilization of all denuded areas and maintenance of erosion control measures continuously between October 1 and April 30.
  - e. Storage, handling, and disposal of construction materials and wastes properly, so as to prevent their contact with stormwater.

- f. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges, to storm drains and watercourses.
  - g. Use of sediment controls or filtration to remove sediment when dewatering the site and obtain all necessary permits.
  - h. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
  - i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
  - j. Limiting construction access routes and stabilization of designated access points.
  - k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
  - l. Training and providing instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
  - m. Additional Best Management Practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.
  - n. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.
- 5. A building permit shall be applied for and obtained from the Building Inspection Section prior to the start of any work.
  - 6. This permit does not allow for the removal of any trees. Any tree removal will require a separate permitting process.
  - 7. The applicant shall not enter into a contract with the landowner or lessee which reserves for one company exclusive use of the structures on this site for telecommunication facilities.
  - 8. The wireless telecommunication facility shall not be lighted or marked unless required by the Federal Communications Commission (FCC) or the Federal Aviation Administration (FAA).

9. The applicant shall maintain the pole and leased area in good condition and perform repairs as necessary to serve their functions. Additionally, the mounting pole shall be maintained in a manner to ensure its compliance to the greatest extent possible. This shall include continual maintenance in the form of repainting and/or repairing any portions of the facility which does not appear as it did at the time of building permit final inspections. Any repairs and/or maintenance to either the mounting pole or supporting equipment shall be of like color and materials. All exposed finish surfaces shall be non-reflective. Verification of design installation according to approved plans will be confirmed by the Current Planning Section prior to a final inspection for the building permit.
10. The applicant shall file, receive, and maintain all necessary licenses and registrations from the Federal Communications Commission (FCC), the California Public Utilities Commission (CPUC), and any other applicable regulatory bodies prior to initiating the operation of these facilities. The applicant shall supply the Planning and Building Department with evidence of each of these licenses and registrations. If any required license is ever revoked, the applicant shall inform the Planning and Building Department of the revocation within 10 days of receiving notice of such revocation.
11. Prior to the issuance of a building permit, the applicant shall submit color and material samples for all approved facility equipment to confirm compliance with the subject approval. Prior to final building inspection, the applicant shall submit photos of the finished project to verify the approved colors and materials have been implemented.
12. The project's final inspection approval shall be dependent upon the applicant obtaining a permanent and operable power connection from the applicable energy provider.
13. The wireless telecommunications facility and all equipment associated with it shall be removed in its entirety by the applicant within 90 days if the FCC and/or CPUC license and registration are revoked or the facility is abandoned or no longer needed, and the site shall be restored to blend with the surrounding area. The owner and/or operator of the wireless telecommunication facilities shall notify the Planning Department upon abandonment of the facility. Restoration shall be completed within two months of the removal of the facility.
14. Explanatory signs, caution, and warning signs are required to be posted at the perimeter of the facility, the antennas and/or on the poles below the antennas, readily visible from any angle of approach to persons who might need to work within the project area.

15. The facility shall be maintained in good working condition and to the visual standards established at the time of approval over the life of this permit. The facility and surrounding area shall remain free from trash, debris, litter, graffiti, and other forms of vandalism. Any damage shall be repaired as soon as is practicable, and in no instance more than ten calendar days from the time of notification by the County or after discovery by the permit holder.

Menlo Park Fire Protection District.

16. The project shall to comply with the 2022 CA Building/Fire Codes and local amendments and California Code of Regulations Title 19 that apply to the project. The following plan review comments are applicable to this submittal.

1. Battery storage system to be equipped with:
  - a. Safety venting caps on batteries
  - b. Spill containment control
  - c. Spill neutralization kit
  - d. Ventilation – supervision is required by an approved central station, proprietary or remote station service or shall indicate an audible/visual signal at a constant attended onsite location.
  - e. Signage – Sign shall state:
    - (1) Room contains energized battery circuits
    - (2) Room contains energized electrical circuits
    - (3) The room contains corrosives liquids.
  - f. Seismic protection
  - g. Smoke detection
2. The applicant shall provide applicable address numbers on enclosures and exterior gates and fences. Addresses shall be visible from the street and contrasting to its background.
3. Provide emergency contact information on enclosures including exterior gates and fences.
4. Approved plans and approval letter must be on site at the time of inspection.

Site Map



Site Plan

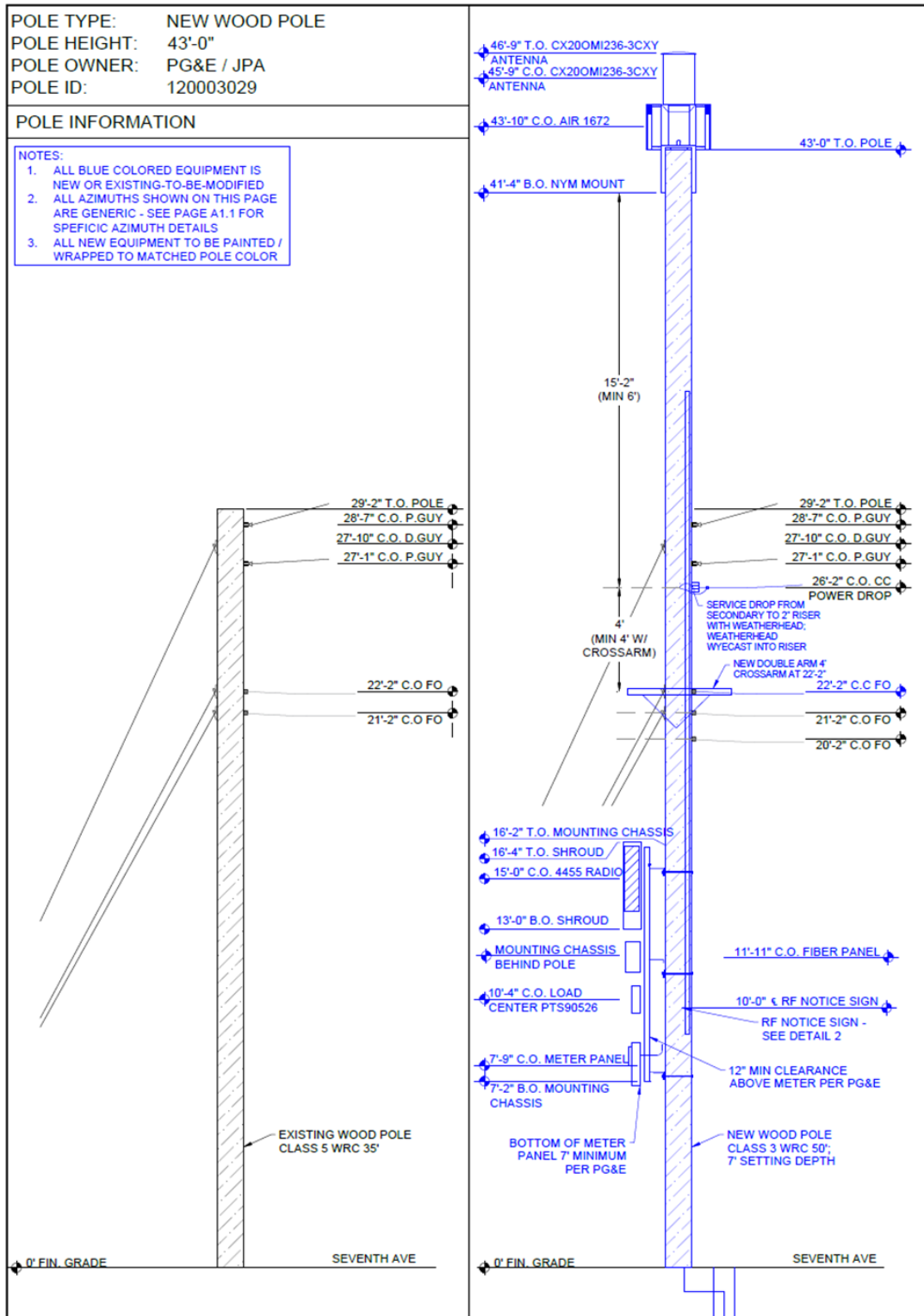


Photo Simulation



CA\_SF\_NORTH\_FAIR\_OAKS\_007M1  
LAT: 37.471327 LONG: -122.202791  
406 SEVENTH AVE  
MENLO PARK, CA 94025

AERIAL MAP



EXISTING



PROPOSED VIEW 1



Prepared By:



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Accuracy of photo simulation based upon information provided by project applicant. The proposed installation shown is a substantially accurate artistic representation, but is not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

RF Report Dated November 13, 2025



**WATERFORD**

**RF EMISSIONS COMPLIANCE REPORT**

<b>Prepared for:</b>	<b>Site:</b>
Crown Castle	CA_SF_NORTH_FAIR_OAKS_007M1
2055 S. Stearman Drive	401 Seventh Ave
Chandler, AZ 85286	Menlo Park, CA 94025
	37.471327, -122.202791

**November 13, 2025**

**This site WILL BE IN COMPLIANCE with  
FCC Regulations and MPE Limits:**

**Crown Castle Is 4.153% of General Population (GP) Limit  
(0.831% of Occupational (Occ) Limit)**

Certification

I have reviewed this RF Emissions assessment report and believe it to be both true and accurate to the best of my knowledge.



SIGNED, 13 NOV 2025

**Analysis completed using Waterford's NIERTool© software.**

**Only clients and client representatives are authorized to provide input data through the Waterford web portal. In securing that authorization, clients and client representatives warrant the accuracy of all input data. Waterford Consultants, LLC attests to the accuracy of the engineering calculations. Waterford also attests that the results of those engineering calculations are correctly summarized in this report.**

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