

**From:** [Tomas Barreto](#)  
**To:** [Luis Topete](#)  
**Cc:** [Ray Mueller](#); [SMC SupMueller](#); [Maria Gonzalez](#); [Bharat Singh](#)  
**Subject:** RE: URGENT: Clarification of Infrastructure Impact & Formal Objection to File No. PLN2025-00235 (1888 Cordilleras Road)  
**Date:** Monday, May 4, 2026 5:38:44 PM

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Adding Bharat Singh for visibility.

Dear Mr. Topete,

I am writing to provide an update to my formal administrative objection regarding **Item #3 (PLN2025-00235)** on the May 7, 2026, Zoning Hearing agenda. I formally request that Item #3 be **pulled from the Consent Agenda** for public comment. I will be attending the hearing in person on **May 7, 2026, at 10:00 AM** to provide verbal testimony and enter physical exhibits into the permanent administrative record.

This communication serves to **preserve the administrative record** for all legal remedies. If an appeal is necessary, I reserve the right to broaden the scope of the administrative challenge to include the applicant's other neighborhood permits (including, if relevant, PLN2025-00234 and PLN2025-00236) to determine whether a systemic pattern of material discrepancies exists, retain formal counsel, and engage independent technical and environmental experts for the May 21, 2026 appeals deadline.

The administrative record was materially altered after 11:44AM this morning 5/4/2026, past the **72-hour legal window** for public review. Specifically:

- **Attachment D** which consists of the **Construction Plans** (including the Title Sheet, Site Plans, Elevations, and Electrical Details) was replaced with a materially different 13-page site plan.
- **Attachment H** which is the **Radio Frequency Emissions Compliance Report** provided by Waterford Consultants was replaced with a materially different 9-page compliance report.
- This is a total of 22 pages of material scope changes to a 76 page staff report.

Modifying core technical and engineering documents after the public review period has commenced constitutes a violation of the **Brown Act** and a failure of due process. These are not minor administrative updates; they represent material changes to the scope of the project.

Last week on Wednesday, April 29, 2026 at 9:48AM, Mr. Topete stated that my comments would be posted to the meeting webpage and provided to the Zoning Hearing Officer. As of 5:00 PM today 5/4/2026, my comments remain missing from the public portal. Furthermore, the applicant is on the record in their rebuttal to my comments as recently as April 29 making materially false statements about their own engineering drawings.

In addition to the violation of the **Brown Act** and a failure of due process the brand new staff report uploaded this afternoon continues to contain **material inconsistencies** and **uncured defects**. I will bring physical copies of the original and modified staff reports, along with

exhibits detailing the remaining material inconsistencies and uncured defects. I will be recommending that the Zoning Hearing Officer **deny this application without prejudice**.

Sincerely,  
Tomas Barreto

On Sat, May 02, 2026 at 2:06 PM, Tomas Barreto <[tomasrb@gmail.com](mailto:tomasrb@gmail.com)> wrote:  
Adding Zoning Hearing Officer Secretary Tet Maria Gonzalez for visibility.

Dear Mr. Topete and Zoning Hearing Officer,

Because the administrative record for File No. PLN2025-00235 is fundamentally broken and relies on mutually exclusive data sets, **I am upgrading my previous request for a stay to a formal request that the Zoning Hearing Officer Deny the Permit Without Prejudice**. The applicant has failed to provide "Substantial Evidence" for approval. I request this denial or, at minimum, an immediate stay of the hearing until the applicant provides:

1. A certified **Arborist Report and Tree Protection Plan** for the **Significant Tree** (Southern Magnolia) next to the proposed pole site to validate qualification for a **CEQA Exemption** and meet county ordinance.
2. An accurate noise study for the hardware specified in the plans (**Radio 4890**) to ensure compliance with Code § 4.88.320.
3. A revised **Alternative Site Analysis (ASA)** that uses the hardware specified in the plans (**Radio 4890**) and that includes evaluation of **PG&E Poles #121655264, #121585539, and #121655256** to meet the least intrusive standard.
4. Reconciling all the hardware inventory across all documents in the administrative record
5. A **formal re-notice** to residents that identifies the specific PG&E Pole ID to clear existing location ambiguity.

**I. Significant Tree Endangerment & Invalid CEQA Exemption** The 29-inch circumference Southern Magnolia at the site is a "**Significant Tree**" under the 19-inch protection threshold for the Emerald Hills district. Excavating for a 36-foot pole only 30 inches from the trunk falls within the **Structural Root Zone** and will cause structural damage to the Critical Root Zone (CRZ) and is well within the TPZ. Additionally because this protected asset is at risk of structural failure, the **Class 3 CEQA Exemption** is factually invalid. A formal Arborist Report and Tree Protection Plan are mandatory under County Ordinance. I have included a PDF as Exhibit A as an attachment (showing the measurements and distances for the impacted Significant Tree).

**II. Documented Noise Code Violation and Invalid Noise Study:** The Noise Assessment bases its compliance on hardware that is not on the plans. Using the applicant's own algorithm and the manufacturer data for the **Radio 4890** (which *is* on the plans), the site violates County standards:

- **At 25°C (77°F):** The 4890 produces **55.5 dBA** at 1 meter. At 6.29 feet, the noise level is **49.8 dBA** exceeding the margin of error of the report (from the applicant's noise study: "*Calculations contained in this report should be considered accurate to within one decibel*").

- **At 30°C (86°F):** The 4890 produces **57.5 dBA** at 1 meter. At the property line, this results in **51.8 dBA**, a direct violation of the **50 dBA nighttime residential limit** under Code § 4.88.320.

As we all know these temperatures are reached in our Emerald Hills neighborhood every year. The applicant also cannot claim "passive cooling" while their own plans specify hardware that manufacturer data proves is actively cooled by fans.

I have included a PDF as Exhibit B as an attachment (showing the incorrect hardware scope for the noise study and manufacturer noise estimates that violate the noise code).

**III. Failure of "Least Intrusive" Standard & Invalid Search Ring:** The Alternative Site Analysis (ASA) is legally and technically deficient under Section 8.376.030(II)(A) because its core premise is based on hardware that is fundamentally different from what is specified in the actual construction plans. The ASA explicitly defines the project scope as the installation of **Radio 4461**. However, the 100% Construction Drawings and Load Calculations specify **Radio 4890**. This calls into question the validity of the search ring radius.

Furthermore, the applicant's own search ring with the incorrect hardware spans at least 680 feet between Candidate C and Candidate I. However, the applicant entirely ignored three viable PG&E owned utility poles walking distance on Cordilleras (all less than 1,000 feet from the proposed candidate in the report). These omitted candidates appear to satisfy all **PG&E Standard 027911** requirements and offer a significantly less intrusive profile than the proposed site:

- **PG&E Pole #121655264 (near 1912 Cordilleras):** Located only **183 feet** from the applicant's investigated Candidate C. This pole has a clear setback and zero vegetation conflicts, avoiding the damage of a **Significant Tree** required at the 1888 Cordilleras site.
- **PG&E Pole #121585539 (near 1947 Cordilleras):** Situated on the **creek side** of the street. This location is physically isolated from private property lines and residential structures, offering a vastly lower acoustic and visual impact than the proposed location.
- **PG&E Pole #121655256 (near 1702 Cordilleras):** Located **950 feet** from evaluated Candidate I.

By excluding viable, clean utility poles including one just 183 feet from its own investigated candidates while simultaneously submitting an ASA based on the wrong hardware the applicant has failed to provide the "comprehensive review" required for a Use Permit . The ZHO cannot legally find the project to be the "least intrusive means" when superior alternatives were never entered into the administrative record.

I have included a PDF as Exhibit C as an attachment (showing the omitted poles and the incorrect hardware scope of the ASA).

#### **IV. Notice was ambiguous and shifted burden of research to residents**

While "(Near) 1888 Cordilleras" may be a "standard convention," it is factually ambiguous at this specific location where two distinct utility assets exist in close proximity. A notice is functionally deficient if an individual of ordinary intelligence must resolve "notice ambiguity" by initiating independent research or contacting the County just to identify

which physical asset is being targeted. By omitting the specific PG&E Pole ID #121623724 which the applicant already possessed the notice effectively shifted the burden of research onto residents to uncover the project's true context.

#### **V. Lack of professional oversight**

The applicant claims the Radio 4890 is not proposed for this site and only appears as "reference material". This is a material misrepresentation. The Radio 4890 is identified as the primary hardware in six different controlling documents within the site plan:

- Title Sheet (T-1): The project scope explicitly states: "Install (2) New Radio 4490 and Radio 4890".
- Elevations (A-3): Explicitly labels "(N) [1] Radio 4890 w/ [1] PSU Behind" .
- Side Elevations (A-4): Again labels "(N) [1] Radio 4890 w/ [1] PSU Behind".
- Equipment Details (D-1): Detail 5 is titled "Radio 4890" and provides mechanical specs for that unit .
- Grounding Schematic (E-2): Explicitly labels the connection for "(N) [1] Radio 4890".
- Electrical Load Calculations (E-3): Detail 10 uses the Radio 4890 (listing 1109W and 11.6 Amps) to calculate the total site load .

Furthermore, the record contains errors suggesting a lack of professional oversight:

- Inaccurate Hardware: Page 11 of the Site Plan labels a "Radio 4415", which is mentioned nowhere else.
- Missing Hardware: The Radio 4461, which the Noise Assessment relies upon to claim compliance , is never mentioned a single time in the 13-page construction drawing set.

The applicant's claim that the Radio 4890 is merely 'reference material' is technically impossible, as it is the sole hardware used to calculate the **Total Site Load** on Sheet E-3 and the **Grounding Requirements** on Sheet E-2. If the 4890 is removed, the engineering basis for the entire site's electrical and safety infrastructure vanishes. I have included a PDF as Exhibit D as an attachment (showing all the hardware discrepancies).

Relying on a record with such profound internal contradictions violates due process. I request a **Denial Without Prejudice** to allow the applicant to submit a factually accurate application that complies with County Code.

Sincerely,

Tomas Barreto

On Thu, Apr 30, 2026 at 5:33 PM, Tomas Barreto <[tomasrb@gmail.com](mailto:tomasrb@gmail.com)> wrote:

Dear Mr. Topete,

Thank you for your continued support, attention and timely responses! I am writing to formally rebut the April 29, 2026, response submitted by NextEdge Networks on behalf of AT&T . The applicant's assertion that my objections are based on a "factual misreading" is demonstrably false and contradicted by their own site plan shared with me by your office on April 28, 2026 (attached to this email as well for reference). The administrative

record is plagued by internal inconsistencies that invalidate the technical findings.

## I. Indisputable Evidence of Radio 4890 Hardware

The applicant claims the Radio 4890 is not proposed for this site and only appears as "reference material". This is a material misrepresentation. The **Radio 4890** is identified as the primary hardware in six different controlling documents within the site plan:

- **Title Sheet (T-1):** The project scope explicitly states: "Install (2) New Radio 4490 and **Radio 4890**".
- **Elevations (A-3):** Explicitly labels "(N) [1] **Radio 4890** w/ [1] PSU Behind" .
- **Side Elevations (A-4):** Again labels "(N) [1] **Radio 4890** w/ [1] PSU Behind".
- **Equipment Details (D-1):** Detail 5 is titled "**Radio 4890**" and provides mechanical specs for that unit .
- **Grounding Schematic (E-2):** Explicitly labels the connection for "(N) [1] **Radio 4890**".
- **Electrical Load Calculations (E-3):** Detail 10 uses the **Radio 4890** (listing 1109W and 11.6 Amps) to calculate the total site load .

Furthermore, the record contains errors suggesting a lack of professional oversight:

- **Inaccurate Hardware:** Page 11 of the Site Plan labels a "**Radio 4415**", which is mentioned nowhere else.
- **Missing Hardware:** The **Radio 4461**, which the Noise Assessment relies upon to claim compliance , is never mentioned a single time in the 13-page construction drawing set.

I have included screenshots taken directly from the applicant's site plan for all of these misrepresentations.

## II. Technical Noise Violations at Local Temperatures

The Noise Assessment bases its compliance on hardware that is not on the plans. Using the applicant's own algorithm and the manufacturer data for the **Radio 4890** (which *is* on the plans), the site violates County standards:

- **At 25°C (77°F):** The 4890 produces **55.5 dBA** at 1 meter. At 6.29 feet, the noise level is **49.8 dBA** exceeding the margin of error of the report (from the applicant's noise study: "*Calculations contained in this report should be considered accurate to within one decibel*").
- **At 30°C (86°F):** The 4890 produces **57.5 dBA** at 1 meter. At the property line, this results in **51.8 dBA**, a direct violation of the **50 dBA nighttime residential limit** under Code § 4.88.320.

As we all know these temperatures are reached in our Emerald Hills neighborhood every year. The applicant also cannot claim "passive cooling" while their own plans specify hardware that manufacturer data proves is actively cooled by fans.

## III. Staleness of Professional Certification

These discrepancies reinforce my objection regarding the **expired seal** of the Professional Engineer (Michael McGuire, License #E18898) . While a seal is valid at the time of signing, its integrity is lost when the document it certifies (a project using 4461 hardware) does not match the project actually being built (a project using 4890 hardware). Relying on a stale, inaccurate report for a discretionary permit is a failure of professional accountability.

#### **IV. Failure of Public Notice & Ambiguity**

While "(Near) 1888 Cordilleras" may be a "standard convention," it is factually ambiguous at this specific location where two distinct utility assets exist in close proximity. A notice is functionally deficient if an individual of **ordinary intelligence** must resolve "notice ambiguity" by initiating independent research or contacting the County just to identify which physical asset is being targeted. By omitting the specific **PG&E Pole ID #121623724** which the applicant already possessed the notice effectively shifted the **burden of research** onto residents to uncover the project's true context .

I request that the County Planning Commission stay the May 7 hearing. The applicant must reconcile the hardware inventory across all documents and provide a current, accurate noise study that accounts for the Radio 4890.

Sincerely,  
Tomas Barreto

On Thu, Apr 30, 2026 at 12:39 PM, Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)> wrote:

Hi Tomas,

Please see attached response from the applicant. Thanks.

**Luis Topete**

Planner III

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**From:** Tomas Barreto <[tomasrb@gmail.com](mailto:tomasrb@gmail.com)>

**Sent:** Tuesday, April 28, 2026 2:31 PM

**To:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>

**Cc:** Ray Mueller <[rmueller@smcgov.org](mailto:rmueller@smcgov.org)>; SMC\_SupMueller <[SMC\\_SupMueller@smcgov.org](mailto:SMC_SupMueller@smcgov.org)>

**Subject:** RE: URGENT: Clarification of Infrastructure Impact & Formal Objection to File No. PLN2025-00235 (1888 Cordilleras Road)

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Thanks for the quick response Luis! Adding our district supervisor Ray Mueller to cc for visibility.

While I appreciate the clarification that "Pole A" is the target, the current application remains fundamentally flawed. I am formally raising the following objections regarding the validity of the public notice and the accuracy of the administrative record.

## 1. Invalid Public Notice & Neighborhood Ambiguity

The public notice mailed to residents identifies the location only as "(Near) 1888 Cordilleras Road".

- **Lack of Specificity:** As previously noted, there are two distinct poles at this location with vastly different operational profiles: a standard distribution pole ("Pole A") and a critical infrastructure pole housing a shared sewage lift station ("Pole B").
- **Due Process Concerns:** By failing to specify the exact asset (e.g., via GPS coordinates or a pole number) in the initial notice, the County has created a "notice ambiguity" that may have prevented affected neighbors from understanding which asset was being affected.
- **Request for Re-Notice:** Given that your office has now confirmed "Pole A" is the target, I request that the County issue a corrected public notice with specific asset identifiers to ensure the community has a transparent opportunity to review the actual project site.

## 2. Hardware Inaccuracy in Technical Studies

A review of the applicant's own documents reveals a significant hardware discrepancy that invalidates the current noise findings.

- **Omitted Equipment:** The Noise Assessment Table 1 bases its 31.12 dBA projection on one **RRU 4461** and two **RRU 4490** units.
- **The Reality:** However, the Site Plan Scope and the Electrical Load Calculations both specify the installation of the **Radio 4490** and the **Radio 4890**.
- **Extreme Noise Delta:** The **Radio 4890** which is the actual hardware intended for the site is entirely missing from the noise calculation. Manufacturer specifications in the report confirm the 4890 can reach a sound pressure level of **73.5 dBA** when its fans are active.
- **Inaccurate Projections:** Relying on a "worst-case" study that ignores the loudest piece of equipment on the site plan is a material error.

### 3. Active Cooling Fraud & False Noise Claims

The Noise Assessment explicitly characterizes the units as "**passive cooling**" to suggest they are silent.

- **Active Cooling Specs:** The manufacturer data sheets provided in Appendix B explicitly list specifications for the "**Radio 4890HP with Fan**" and the "**Radio 4490HP with Fan**".
- **Violation of Standards:** Active fans are temperature-dependent noise sources. The omission of fan-driven noise in the report's 31.12 dBA projection makes the study factually incorrect and technically unreliable.

### 4. Expired Professional Seal & Staleness

The County is relying on a report that lacks valid professional oversight.

- **Expired License:** The seal of the Professional Electrical Engineer (Michael McGuire, License #E18898) used to certify the noise study expired on **September 30, 2025**.
- **Lack of Accountability:** As it is now April 2026, the applicant is effectively using an "orphan" report to support a current permit. A discretionary Use Permit cannot proceed based on a certification that has been expired for seven months.

I request that the May 7 hearing be stayed until the applicant provides a re-certified, current noise study reflecting the 4890 hardware and until a corrected public notice is issued to the community.

Sincerely,

Tomas Barreto

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On Tue, Apr 28, 2026 at 9:40 AM, Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)> wrote:

Hi Tomas,

Thank you for your comments. Please see responses below and let me know if you have any follow up questions or request additional clarification.

1. Pole A is the pole in question. Please see attached drawings for pole location (Latitude: 37.473252; Longitude: -122.266346).

2. Pole B is not a part of this project.
  
3. The FCC “substantial change” criteria are used to determine whether a proposed modification qualifies as an Eligible Facilities Request, which requires ministerial approval. The subject application does not qualify as an Eligible Facilities Request and is instead being processed as a Use Permit subject to County discretionary review.

Wireless telecommunications facilities located within the public right-of-way are not subject to discretionary design review. Review of such facilities is conducted pursuant to applicable federal law and County-adopted objective standards. Aesthetic requirements for wireless facilities must be objective, published in advance, and applied in a reasonable and non-discriminatory manner. While visual considerations may be evaluated where tied to adopted criteria (e.g., scenic corridors or designated public viewsheds), such standards are applied based on publicly accessible vantage points.

An Alternative Site Analysis (attached) has been provided by the applicant and is included in the project record for consideration consistent with applicable requirements. Photo simulations provided are also attached.

4. Noise study is attached.
  
5. Project was referred to the Public Works Road Division, but not to the Public Works Sewer Division or Environmental Health Services.

**Luis Topete**

Planner III

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**From:** Tomas Barreto <[tomasrb@gmail.com](mailto:tomasrb@gmail.com)>

**Sent:** Monday, April 27, 2026 8:45 PM

**To:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>

**Cc:** [publicworks@smcgov.org](mailto:publicworks@smcgov.org); [mchow@smcgov.org](mailto:mchow@smcgov.org); HS\_EH\_EnvHealth <[envhealth@smcgov.org](mailto:envhealth@smcgov.org)>; Lisa Gauthier <[lgauthier@smcgov.org](mailto:lgauthier@smcgov.org)>

**Subject:** URGENT: Clarification of Infrastructure Impact & Formal Objection to File No. PLN2025-00235 (1888 Cordilleras Road)

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Dear Mr. Luis Topete,

I am writing as the owner of 1870 Cordilleras Road regarding the AT&T small cell facility application (PLN2025-00235). Please include this correspondence and the attached site photos in the official administrative record for this file.

To ensure a complete and transparent public review process, I am formally requesting the following documentation and raising the following objections:

## **1. Material Ambiguity Regarding Subject Infrastructure**

There is a significant identification error in the current application materials. There are two distinct poles in the immediate vicinity of 1888 Cordilleras Road:

- "Pole A": A standard secondary distribution pole.
- "Pole B": A critical infrastructure pole for a shared sewage lift station serving both 1870 and 1888 Cordilleras Road.

I request a site plan identifying the specific PG&E pole number or GPS coordinates targeted. My subsequent technical objections are contingent upon this identification.

## **2. Critical Infrastructure Risk (If "Pole B" is targeted)**

If the applicant intends to replace the pole housing the sewage lift station, the project introduces a high-consequence risk of a Sanitary Sewer Overflow (SSO). I require documentation on the following:

- **Wireless Telemetry/SCADA Interference:** If the lift station utilizes a wireless alarm system, provide a technical study ensuring the small cell's RF output will not jam the telemetry signals that notify Public Works of a pump failure.
- **Alarm and Access Integrity:** Provide evidence that the 11-foot height increase and equipment cabinets will not obscure visual/audible alarms from the right-of-way, nor impede 24/7 unrestricted access for emergency vacuum trucks and repair crews.
- **Utility Conflict:** Demonstrate compliance with PG&E Greenbook Section 4.2 regarding the safety of maintaining multiple electrical services (including critical sewage infrastructure) on a single replacement pole.

### **3. Material Design Incompatibility & Visual Impact**

The proposed increase from 24' 11" to 35' 11" (a 44% increase) exceeds the FCC's 10-foot "substantial change" threshold and is fundamentally incompatible with the Emerald Lake Hills Design Review (DR) District and Residential Hillside (RH) zoning.

- **Line-of-Sight Analysis & Simulations:** In lieu of standard simulations, I request a formal Line-of-Sight Analysis and "before and after" renderings from the primary living areas of 1870 Cordilleras Road and other affected properties to evaluate the impact on privacy and the community's shared viewshed.
- **Design Review Officer (DRO) Involvement:** Has the Emerald Lake Hills DRO issued a finding of compatibility for this 36-foot structure? If not, the application should be considered incomplete under local design standards.
- **Alternative Site Analysis:** Provide the documentation justifying why this residential pole was selected over other options.

### **4. Noise and Environmental Compliance**

- **Noise Study:** Provide specifications and decibel projections for the equipment cooling systems at the property line of 1870 Cordilleras and other affected properties.
- **CEQA Challenge:** If it's Pole B I formally contest the Class 3 Categorical Exemption. The "unusual circumstances" of a shared sewage lift station on the subject pole (CEQA Guidelines Section 15300.2(c)) necessitate a more rigorous environmental review than a standard exemption allows.

### **5. Inter-Departmental Referrals**

Please confirm if this application has been formally referred to the Public Works Sewer Division and Environmental Health Services. Given the proximity to the lift station, their formal sign-off is a prerequisite for public safety.

Given the material ambiguity regarding the subject asset and the potential impacts on critical sanitary infrastructure and neighborhood character, I request that this application be stayed. The review process should not proceed until the applicant provides a corrected site plan and all technical, environmental, and design concerns raised here are validated by the relevant County departments.

Sincerely,

Tomas Barreto

1870 Cordilleras Road

Emerald Hills, CA 94062

919-961-6432

I











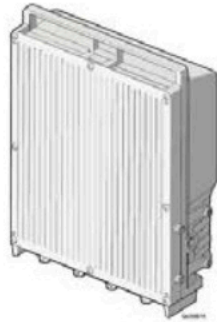
**Table 1 – Proposed Equipment**

Quantity	Description	Manufacturer	Model Number	Sound Pressure Level (dBA) @ 1 meter
1	Antenna	GAMMA NU	DOY9X360F16T4	none
1	RRU (passive cooling)	Ericsson	4461	36
2	RRU (passive cooling)	Ericsson	4490	26

Description 351/1551-LZA 701 6001/1 Uen K

## Radio Description

### Radio 4890HP



## Acoustic Noise

The Radio 4890HP sound pressure level is lower than 28 dBA at 1-meter distance for hemispherical distribution, based on ISO 9614-2 and ISO 11203.

With the fan, the acoustic noise is ambient temperature dependent, as listed below.

Table 14 Maximum Sound Pressure Level (dBA) for Radio 4890HP with Fan 15

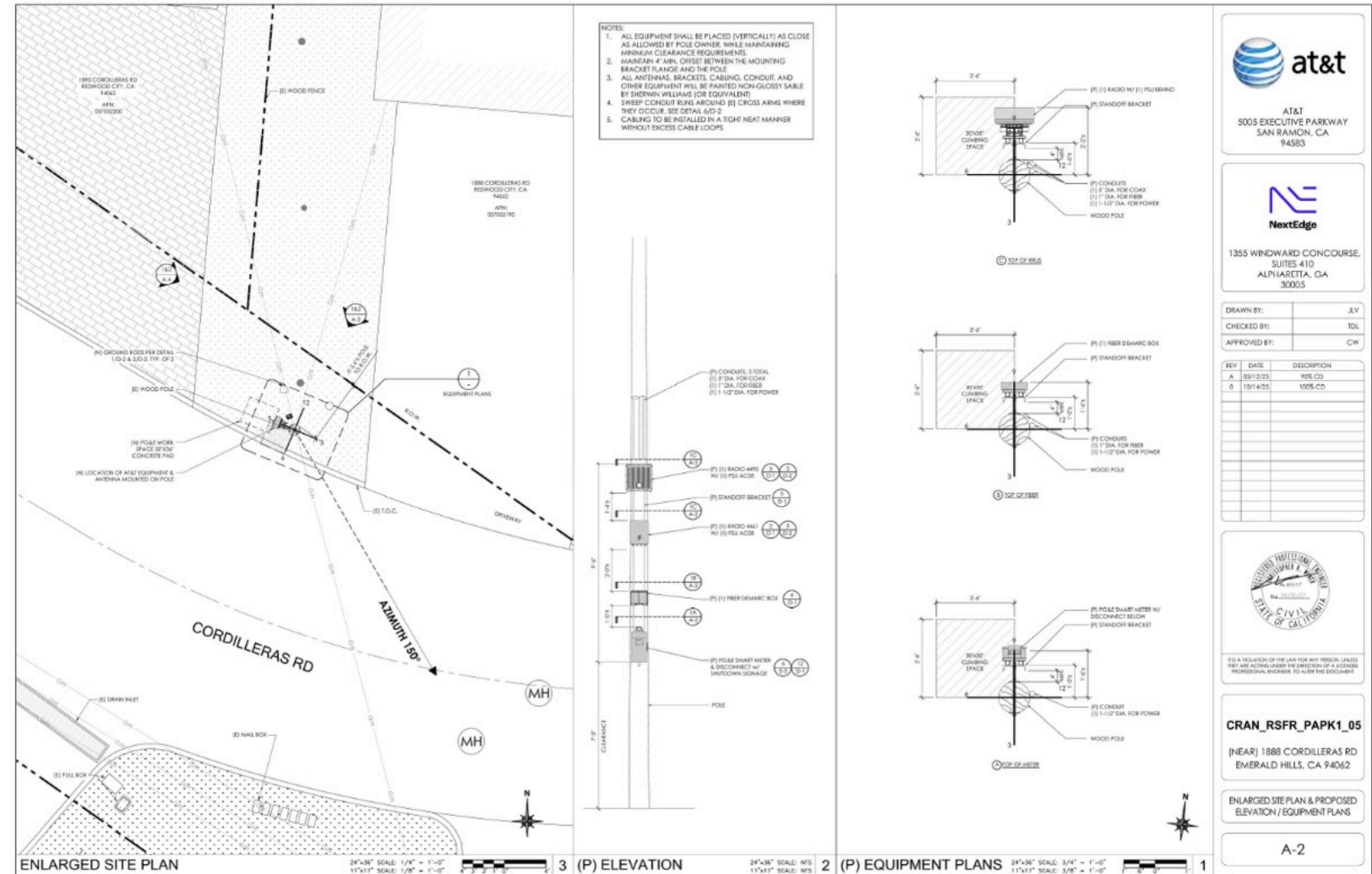
Temperature (°C)	Radio 4890HP Sound Pressure Level (dBA) at 1-meter Distance <sup>(1)</sup>
+10	52
+15	52
+20	52
+25	55.5
+30	57.5
+40	63
+45	64.5
+55	73.5

(1) The sound pressure level is measured at hemispherical distribution.

# Scope of Work & Site Design

## Scope of Work

- Install (1) new 2-canister antenna on top of wooden PG&E utility pole
- Install (2) new Radio 4490 and Radio 4461 on wooden PG&E utility pole
- Install (2) new PSU ACDB on wooden PG&E utility pole
- Install (1) new coax conduit from equipment to new canister antenna
- Install (1) new power conduit from P.O.C. to equipment
- Install (1) new fiber conduit from P.O.C. to equipment
- Install (1) new equipment bracket
- Install (1) new SmartPole meter / disconnect
- Install (1) new fiber box
- All AT&T appurtenances painted non-glossy "Sable" (Sherwin Williams) to match pole color
- Existing wood utility pole to be replaced with new wood utility pole by PG&E





1-2-655264

26  
02





2

5

[Yellow band]

[Yellow band]

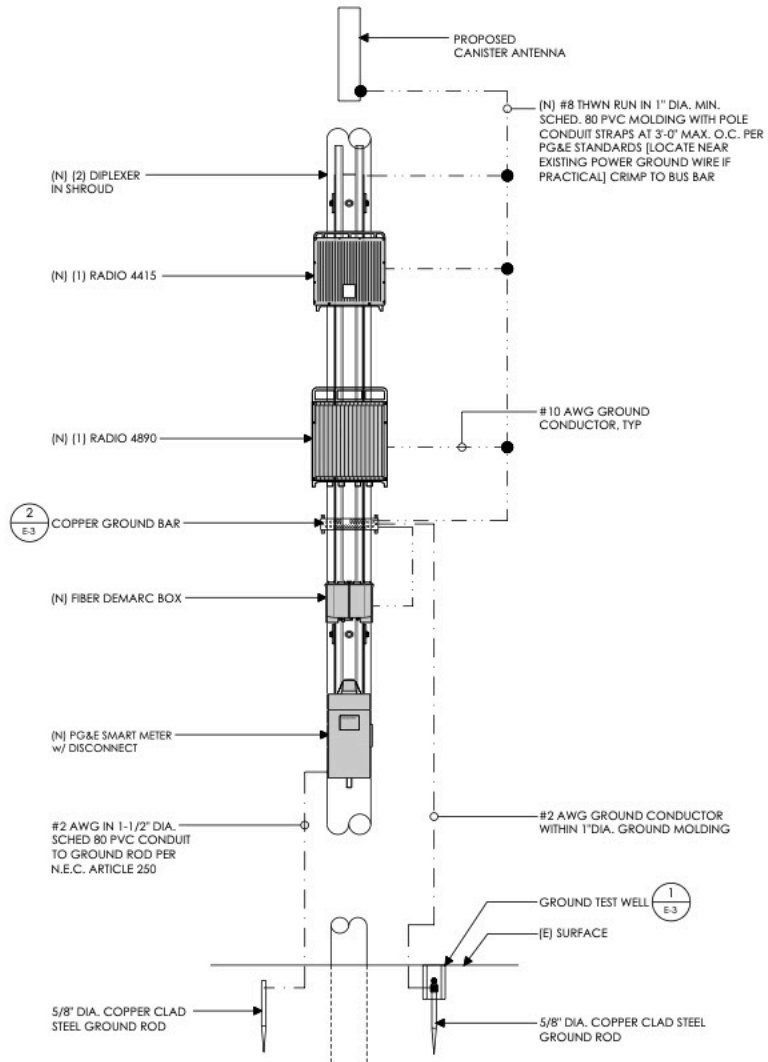
[Yellow band]





**Electrical Load Calculations @ 120V**

<b>Radio</b>	<b>Wattage</b>	<b>1.25*VA</b>	<b>Amps</b>
4490	989	1236.3	10.3
4890	1109	1386.3	11.6
		0.0	0.0
		0.0	0.0
		0.0	0.0
<b>Totals</b>		2622.5	21.9
<b>Disconnect / Meter: 68 Amps</b>			
<b>Total Load: 32.1%</b>			



## GROUNDING SCHEMATIC

# RADIO 4490

SCALE  
NTS

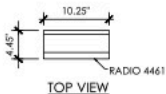
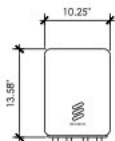
3

## ERICSSON RADIO 4461 (OR APPROVED EQUIVALENT)

COLOR: GRAY

DIMENSIONS: 13.58" TALL x 10.25" WIDE x 4.45" DEEP

WEIGHT: 24.25 LBS

TOP VIEWSIDE VIEWFRONT VIEW

# RADIO 4890

SCALE  
NTS

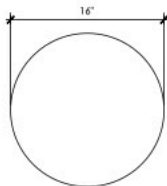
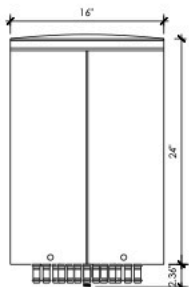
2

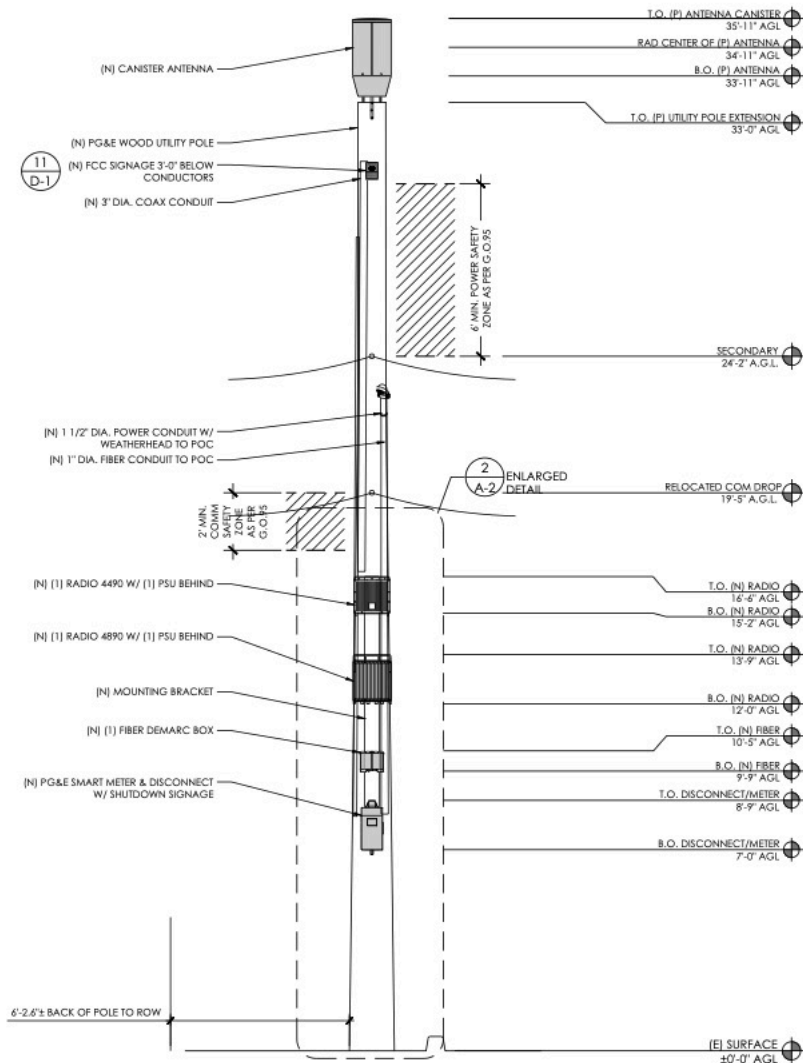
## GAMMA NU DOY9X360F16T4

ANTENNA COLOR: GRAY, BROWN, AND BLACK

DIMENSIONS: 24" TALL X Ø16"

NET WEIGHT: 29.1 LBS

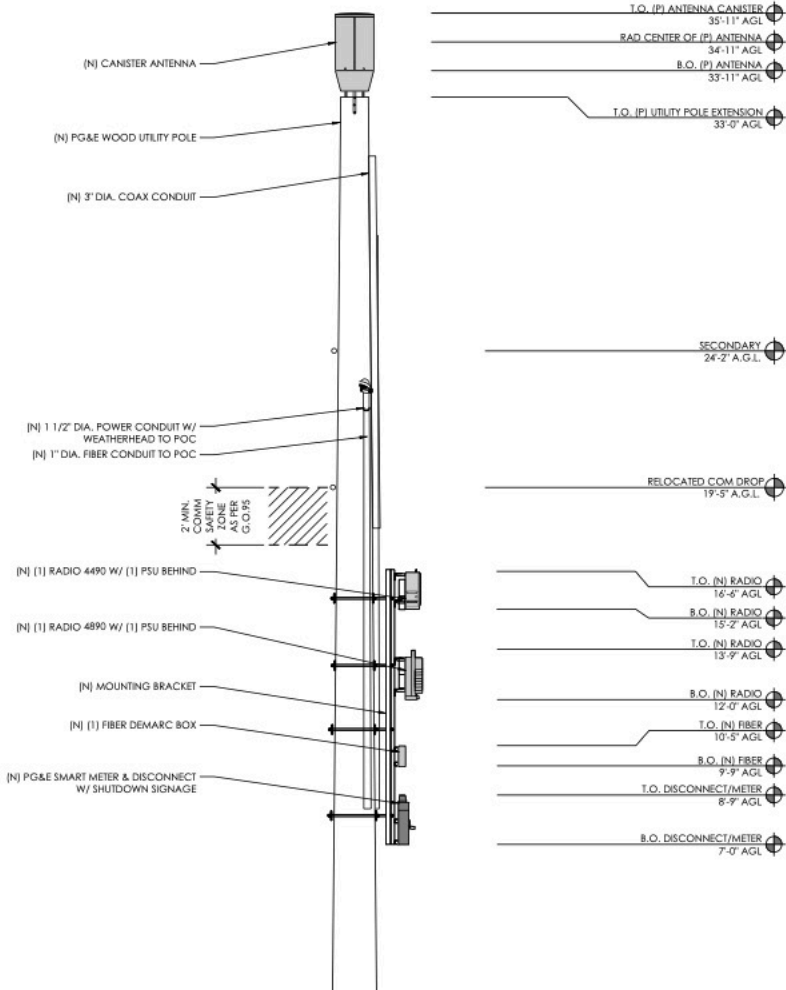
PLANELEVATION



PROPOSED SIDE ELEVATION

24"x36" SCALE: 3/8" = 1'-0"  
 11"x17" SCALE: 3/16" = 1'-0"





# PROJECT DESCRIPTION

AT&T PROPOSES TO INSTALL A NEW WIRELESS COMMUNICATION SITE ON A WOODEN PG&E UTILITY POLE IN THE PUBLIC RIGHT-OF-WAY.

## SCOPE:

- INSTALL (1) NEW 2' CANISTER ANTENNA ON TOP OF WOODEN PG&E UTILITY POLE
- INSTALL (2) NEW RADIO 4490 AND RADIO 4890 ON WOODEN PG&E UTILITY POLE
- INSTALL (2) NEW PSU AC08 ON WOODEN PG&E UTILITY POLE
- INSTALL (1) NEW COAX CONDUIT FROM EQUIPMENT TO NEW CANISTER ANTENNA
- INSTALL (1) NEW POWER CONDUIT FROM P.O.C. TO EQUIPMENT
- INSTALL (1) NEW FIBER CONDUIT FROM P.O.C. TO EQUIPMENT
- INSTALL (1) NEW EQUIPMENT BRACKET
- INSTALL (1) NEW SMART METER / DISCONNECT
- INSTALL (1) NEW FIBER BOX
- CABLING TO BE INSTALLED IN A TIGHT NEAT MANNER WITHOUT EXCESS CABLE LOOPS
- ALL AT&T ADDED APPURTENANCES SHALL BE PAINTED TO MATCH POLE COLOR (NON-GLOSSY "SABLE" BY SHERWIN WILLIAMS, OR EQUIVALENT)

**From:** [Maria Gonzalez](#)  
**To:** [Luis Topete](#)  
**Cc:** [Bharat Singh](#)  
**Subject:** FW: Zoning Hearing - Comment on File PLN2025-00235  
**Date:** Monday, May 4, 2026 7:23:18 AM  
**Attachments:** [Letter to San Mateo Zoning Hearing Officer.docx](#)

---

**From:** Grant Jacobson <gdjacobson@yahoo.com>  
**Sent:** Sunday, May 3, 2026 4:57 PM  
**To:** Maria Gonzalez <mgonzalez1@smcgov.org>  
**Subject:** Zoning Hearing - Comment on File PLN2025-00235

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---

To: County of San Mateo Zoning Hearing Officer

From: Grant and Janine Jacobson  
1911 Cordilleras Rd

Emerald Hills, CA 94062

Date: May 5, 2026

Subject: Formal Opposition to Proposed Wireless Telecommunication Facility – **Project File PLN2025-00235**

Location: Near 1888 Cordilleras Road, Emerald Hills

Hello,

Our names are Grant and Janine Jacobson, and our family has lived at 1911 Cordilleras Rd since 2004, **22 years**. Our home is located across the street and within 150 feet of the proposed installation. Due to the proposed height, we will have a direct line of sight from our primary living spaces to the new pole-mounted antenna.

I respectfully request that you **deny approval** of this project.

The application, as submitted, fails to meet the San Mateo County Zoning Regulations for Wireless Telecommunications Facilities (Code of Ordinances Title 8) that states:

***Wireless telecommunication facilities shall not be located in areas zoned Residential (R).***

**1. Violation of Development and Design Standards (Section 8.376.030.II.B)**

The applicant has failed to comply with this section of the code, which prohibits new wireless facilities in Residential (R) zones unless a preponderance of evidence proves no feasible alternative exists.

Despite the requirement to evaluate all sites within a *2.5-mile radius*, the applicant only submitted alternatives within the same residential zone on Cordilleras Road. ***The application provides no***

***justification for the exclusion of non-residential sites, specifically those along Edgewood Road, which must be assessed to satisfy the ordinance's feasibility standards.***

## **2. Violation of Height Standards (Section 8.376.030.II.I2)**

The ordinance states that in a Residential (R) district, no antenna shall exceed the maximum height for structures by 10% or 5 feet, whichever is less.

- **The Limit:** With a standard residential height limit of 28', the maximum allowable height is 30'9".
- **The Proposal:** This project reaches 35'11"—over 5 feet beyond the limit.
- **Technical Excess:** Under *GO95 standards*, the pole height could be reduced to 28'2" while maintaining safety clearances. The applicant is seeking excessive height not to serve the residents of Cordilleras Road, but to service transit traffic on Edgewood Road at the expense of our neighborhood's zoning integrity.

## **3. Failure to Provide Alternatives Analysis (Section 8.376.030.V.B.16)**

The ordinance requires a **detailed alternatives analysis** demonstrating that no feasible sites exist **outside** of Residential (R) districts.

- The applicant failed this requirement. They only provided options within the residential district on Cordilleras Road.
- No evaluation was provided for non-residential sites, such as Edgewood Road.

***The application is incomplete and should be rejected on this basis alone.***

## **4. Adverse Visual Impact & Viewshed Obstruction (Section 8.376.030.II.E)**

The ordinance mandates that facilities be sited outside of the public viewshed to avoid visual blight.

- Adding 11' to the existing pole places the antenna in the direct line of sight from our house.
- "Stealth" painting does not mitigate the substantial new massing of the structure, which creates a permanent industrial eyesore in a residential sanctuary and threatens our long-term property values.

## **5. Public Health, Safety, and Welfare (Section 8.376.010.D)**

While the FCC limits local regulation of RF health effects, the County maintains authority over the **safety** and **welfare** of its residents.

- **Incorrect Data:** The applicant originally submitted an RF report for the *wrong location*. Providing incorrect data to the public undermines the entire due process of this hearing.
- **Missing Data:** The submitted report shows radiation levels 3,330% beyond the MPE at the antenna level yet provides no calculations for my home's specific elevation.
- **Lack of Benefit:** This facility offers ***no emergency backup power***, providing zero benefit to residents during power outages while imposing significant risks to a neighborhood filled with young children.

#### **6. Environmental & Performance Concerns (Section 8.376.030.III.H)**

There is no grading permit or arborist report included, despite the pole being sited within one foot of a healthy, established magnolia tree. Without a professional evaluation, this project risks destroying mature community greenery.

#### **Conclusion**

The County has not updated wireless regulations since 2012, but the existing laws remain in effect to protect the character and safety of Emerald Hills. This application relies on a series of exceptions that violate the core protections of our Residential (R) district.

I urge the Hearing Officer to uphold the San Mateo County Zoning Ordinances and **deny this application.**

Respectfully,

Grant and Janine Jacobson  
1911 Cordilleras Rd  
Emerald Hills, CA 94062

415-533-9748

To: County of San Mateo Zoning Hearing Officer

From: Grant and Janine Jacobson  
1911 Cordilleras Rd  
Emerald Hills, CA 94062

Date: May 5, 2026

Subject: Formal Opposition to Proposed Wireless Telecommunication Facility – Project File PLN2025-00235

Location: Near 1888 Cordilleras Road, Emerald Hills

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#### **1. Violation of Development and Design Standards (Section 8.376.030.II.B)**

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I urge the Hearing Officer to uphold the San Mateo County Zoning Ordinances and **deny this application.**

Respectfully,  
Grant and Janine Jacobson  
1911 Cordilleras Rd  
Emerald Hills, CA 94062  
415-533-9748

---

**From:** [Luis Topete](#)  
**To:** "Paul Willis"  
**Cc:** [Bharat Singh](#); [Maria Gonzalez](#)  
**Subject:** RE: Zoning Hearing for PLN2025-00235  
**Date:** Thursday, April 30, 2026 12:15:00 PM

---

Paul,

Office number is 650-383-4683.

**Luis Topete**  
Planner III

---

**From:** Paul Willis <mitpdub@outlook.com>  
**Sent:** Thursday, April 30, 2026 12:00 PM  
**To:** Luis Topete <ltopete@smcgov.org>  
**Cc:** Bharat Singh <bsingh@smcgov.org>; Maria Gonzalez <mgonzalez1@smcgov.org>  
**Subject:** Re: Zoning Hearing for PLN2025-00235

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Luis,

Thanks for getting a copy of their response to me and their acknowledgement that they submitted an erroneous study. I also appreciate that you have kept my name and address private for now as my neighbors and I decide if we would support this installation.

Can you share your office number, so if I have any other minor questions I can call you directly ?

Thank you,

Paul Willis  
1895 Cordilleras Road  
(650)260-2101

---

**From:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>  
**Sent:** Thursday, April 30, 2026 11:29 AM  
**To:** Paul Willis <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>  
**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>; Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>  
**Subject:** RE: Zoning Hearing for PLN2025-00235

Paul,

Thank you for raising this concern. Please see the attached response from the applicant and let me know if you have any follow-up questions.

**Luis Topete**

Planner III

---

**From:** Paul Willis <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>

**Sent:** Wednesday, April 29, 2026 4:39 PM

**To:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>

**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>; Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>

**Subject:** Re: Zoning Hearing for PLN2025-00235

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Luis,

Thank you so much for your reply. Your responsiveness is exceptional and we're lucky to have you on our side here in the County.

I'll review in more detail later, but an initial review on the Emissions Compliance Report, although Candidate A (located next to 1888) was chosen, the report appears to be using Candidate B(next to 1887) for the emissions findings. This location also has a different final height. Do you have a report specific to the recommended location Candidate A ?

Regards,

Paul Willis

1895 Cordilleras Road

---

**From:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>

**Sent:** Wednesday, April 29, 2026 3:41 PM

**To:** Paul Willis <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>

**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>; Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>

**Subject:** RE: Zoning Hearing for PLN2025-00235

Hi Paul,

See responses below in blue and let me know if you have any follow up questions. Please note that San Mateo County's wireless regulations were originally developed to address traditional macro wireless facilities (e.g., towers and monopoles) and do not contain a standalone ordinance specifically tailored to small wireless facilities. However, the County applies these existing regulations, as relevant to the facility type and site conditions, and as supplemented by federal law and current administrative practices, to review and permit small cell installations.

**Luis Topete**

Planner III

---

**From:** Paul Willis <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>

**Sent:** Wednesday, April 29, 2026 11:27 AM

**To:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>

**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>; Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>

**Subject:** Re: Zoning Hearing for PLN2025-00235

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Luis,

Thank you for your quick response with links. I'm not for or opposed to the project, but request additional clarification so I can make an informed decision if needed. I'm also in communication with our immediate neighbors and can assist them with any questions they may have on the plans.

Here's my questions so far

- What is the diameter of the new proposed pole, and depth of embedment ?  
[Diameter is approximately one foot and depth of embedment is 7 feet. Structural analysis is attached.](#)
- Is there a benefit to the Cordilleras homes, or are the antennas directional and serving vehicular traffic on Edgewood Road? I'm not able to determine the antenna direction is missing from the plans. [The project is intended to provide reliable in-building service to the surrounding residential community, not just roadway traffic.](#)  
From San Mateo County Code of regulations
- SECTION 6512.2. 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 24.5.3 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 - **Was this provided ?** [Wireless coverage maps were provided. Additionally, an alternative site analysis and collocation assessment of existing structures within 2.5 miles were provided and are attached.](#)

- SECTION 6512.5 B

8. A preliminary erosion control plan shall be submitted with the use permit application. A complete construction and erosion control plan shall be submitted with the building permit application- **Was this provided ?** [Not required based on the proposed scope of work.](#)

9. A maintenance plan detailing the type and frequency of required maintenance activities.- **Was this provided ?** [Not required based on the proposed scope of work.](#)

11. Identification of existing wireless telecommunication facilities within a 2.5- mile radius of the proposed location of the new wireless telecommunication facility, and an explanation of why co-location on these existing facilities, if any, is not feasible. This explanation shall include such technical information and other justifications as are necessary to document the reasons why collocation is not a viable option. The applicant shall provide a list of all existing structures considered as alternatives to the proposed location. The applicant shall also provide a written explanation why the alternatives considered were either unacceptable or infeasible. If an existing tower was listed among the alternatives, the applicant must specifically address why the modification of such tower is not a viable option. The written explanation shall also state the radio frequency coverage and/or capacity needs and objective(s) of the applicant.- **Was this provided ?** [Wireless coverage maps were provided. Additionally, an alternative site analysis and collocation assessment of existing structures within 2.5 miles were provided and are attached.](#)

13.A Radio Frequency (RF) report describing the emissions of the proposed wireless telecommunication facility and, to the extent reasonably ascertainable, the anticipated increase in emissions associated with future co-location facilities.-**Was this provided ?** [Yes, report is attached.](#)

16.Applications for the establishment of new wireless telecommunication facilities inside Residential (R) zoning districts and General Plan land use designations shall be accompanied by a detailed alternatives analysis that demonstrates that there are no feasible alternative non-residential sites or combination of non-residential sites available to eliminate or substantially reduce significant gaps in the applicant carrier's coverage or network capacity.- **Was this provided ?** [Yes, report is attached.](#)

I believe if there are missing components to their application, it would be best to deem the application incomplete so the shot clock will pause.

Best regards,

Paul Willis  
1895 Cordilleras Road  
Emerald Hills, CA 94062

---

**From:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>  
**Sent:** Wednesday, April 29, 2026 9:40 AM  
**To:** [mitpdub@outlook.com](mailto:mitpdub@outlook.com) <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>  
**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>; Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>  
**Subject:** RE: Zoning Hearing for PLN2025-00235

Hi Paul,

Thank you for your comments. Application forms and drawings are attached. A link to our wireless telecommunication facilities ordinance is below.

No tree removal or tree trimming is proposed. A recommended condition of approval would require that any tree removal will require a separate permitting process. Prior to start of work, tree protection fencing shall be installed to protect trees within the area of project disturbance.

**Wireless Telecommunication Facilities Ordinance**

<https://www.smcgov.org/planning/wireless-telecommunication-facilities-ordinance>

Thank you.

**Luis Topete**  
Planner III

---

**From:** Maria Gonzalez <[mgonzalez1@smcgov.org](mailto:mgonzalez1@smcgov.org)>  
**Sent:** Wednesday, April 29, 2026 9:30 AM  
**To:** Luis Topete <[ltopete@smcgov.org](mailto:ltopete@smcgov.org)>  
**Cc:** Bharat Singh <[bsingh@smcgov.org](mailto:bsingh@smcgov.org)>  
**Subject:** FW: Zoning Hearing for PLN2025-00235

---

**From:** Paul Willis <[mitpdub@outlook.com](mailto:mitpdub@outlook.com)>  
**Sent:** Wednesday, April 29, 2026 8:37 AM  
**To:** [itopete@smcgov.org](mailto:itopete@smcgov.org)  
**Subject:** Zoning Hearing for PLN2025-00235

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Hello,

This request is for more information for the above permit for the location nearest 1888 Cordilleras Road in Emerald Hills, near 057-052-190.

I received your notice in the mail yesterday, and request the following information:

- Please send me a copy of the new small cell wireless application, including plans for the new pole.
- Specifically, I would like to see the existing pole dimensions, the proposed pole dimensions, the size of the new proposed cabinetry, and the size of the radome proposed on top of the pole. I would like to also verify the direction of the antennas, how many, and if this installation will benefit our neighbors on Cordilleras, or if they are meant to serve traffic on Edgewood Road.
- If you have a link to the County of San Mateo's small cell ordinance, and or design guidelines that would be helpful.
- There are healthy trees in the vicinity of the existing pole, so I would like to know the proposed plans for those existing trees.

Thank you,

Paul Willis  
1895 Cordilleras Road  
Emerald Hills, CA 94062

## VIA EMAIL

May 1, 2026

County of San Mateo  
Planning & Building Department  
455 County Center, 2nd Floor  
Redwood City, CA 94063

**Attn: Luis Topete, Planner III**

**Re:** Corrected Construction Drawings – AT&T Small Wireless Facilities – Public Right-of-Way  
CRAN\_RSFR\_PAPK1\_04 (near) 2189 Edgewood Road (PLN2025-00234)  
CRAN\_RSFR\_PAPK1\_05 (near) 1888 Cordilleras Road (PLN2025-00235)

Dear Luis,

On behalf of AT&T Mobility LLC, this letter supplements our prior responses of April 29 and April 30, 2026, regarding community comments on Application PLN2025-00235 and provides corrected construction drawing sets for the two above-referenced applications. As explained below, an administrative oversight during a staff transition resulted in the County's files retaining superseded May 2025 construction drawings rather than the current October 14, 2025 drawing sets for these two sites. This is the root cause of the hardware identification discrepancies raised by the community member, and we are now correcting the record.

### **I. The Drawing-Version Discrepancy**

During the design development phase, AT&T refined the equipment configuration for sites PPK1\_04 and PPK1\_05. The initial construction drawings prepared in May 2025 depicted an Ericsson Radio 4890 (Model RRHS-4890 B25/B66) as one of the proposed Remote Radio Units. That unit was subsequently replaced with an Ericsson Radio 4461 as part of standard design optimization, and updated construction drawing sets were finalized on **October 14, 2025** at the 100% Construction Document milestone.

Due to an administrative oversight during a project manager transition, the October 14, 2025 drawing sets were completed internally but were not transmitted to the County Planning Department. The superseded May 2025 versions consequently remained in the application files and were referenced in the staff reports for PLN2025-00234 and PLN2025-00235. The community comments submitted for PLN2025-00235, while carefully constructed, were based on these superseded drawings and therefore attributed hardware to the project (the Radio 4890) that is not proposed for installation at either site.

Enclosed with this letter are the current, controlling construction drawing sets:

- **CRAN\_RSFR\_PAPK1\_04** (PLN2025-00234): Rev 0, dated October 14, 2025
- **CRAN\_RSFR\_PAPK1\_05** (PLN2025-00235): Rev 0, dated October 14, 2025

We respectfully request that these drawing sets replace the May 2025 versions in the administrative record.

## **II. All Technical Studies Reflect the Correct Equipment**

The drawing-version discrepancy, while regrettable, is a technicality that does not affect any technical finding in the record. Every professional study submitted with these applications was independently prepared using the correct proposed equipment (Radio 4490 and Radio 4461). The corrected drawings bring the construction document sets into alignment with the technical studies that were already accurate.

### ***A. Noise Studies***

As detailed in our April 29, 2026 response letter, the Noise Assessment Letters for both sites (EBI Consulting, Michael McGuire, P.E.) analyze the Radio 4461 (36 dBA, passive cooling) and Radio 4490 (26 dBA, passive cooling) in Table 1. No Radio 4890 was used in any calculation. The compliance determinations under County Code § 4.88.320 are correct and unaffected by the drawing correction.

We note that while the noise studies include the Radio 4890HP manufacturer specification sheet in Appendix B as reference material, the 4461 specification sheet was not included. We will provide the Ericsson Radio 4461 manufacturer specification sheet to the County next week for inclusion in the record as supplemental reference documentation.

### ***B. RF Emissions Compliance (EME) Reports***

The EME Reports for both sites (Waterford Consultants, Tim Alexander, P.E.) correctly identify the proposed equipment as Radio 4490 and Radio 4461. The updated EME Report for PAPK1\_05, dated October 30, 2025, was submitted to the County on April 30, 2026 as part of our response regarding the aerial photograph annotation. The EME Report for PAPK1\_04 has always reflected the correct Radio 4461 designation. The RF compliance conclusions are wholly unaffected by the RRU substitution because RF emissions compliance is determined by the antenna's operating parameters (ERP, frequency, gain, mounting height), not by the RRU model. As the reports themselves state: "Other appurtenances such as GPS antennas, RRUs and hybrid cable below the antennas are not sources of RF emissions."

The maximum predicted ground-level power densities, as a percentage of FCC General Population exposure limits, underscore the significant compliance margins at each site:

- **PAPK1\_04** (2189 Edgewood Rd): **0.61%** of the FCC General Population limit
- **PAPK1\_05** (1888 Cordilleras Rd): **0.97%** of the FCC General Population limit

At these levels, the proposed facilities operate at less than 1% of the allowable exposure threshold at every accessible ground-level location. These results assume all RF emitters operating simultaneously at maximum duty cycle, a theoretical worst-case scenario that overstates actual operating conditions. Under Section 332(c)(7)(B)(iv) of the Telecommunications Act of 1996, the County may not deny or condition these applications on the basis of RF emissions where, as here, the facilities comply with FCC regulations.

**C. Structural Analyses**

The Structural Analysis Reports for both sites (Chris Werner, P.E.) modeled “Box Radio 4490” and “Box Radio 4461” in the O-Calc Pro equipment schedules. No Radio 4890 appears in any structural calculation. The Radio 4461 imposes approximately 64% less dead load and 57% less wind load than the Radio 4890, so the structural conclusions are conservative.

**D. Electrical Load**

The Radio 4461 has lower power consumption than the Radio 4890 (which was listed at 1,109W / 11.6A on the superseded drawings). The electrical service is adequately sized with additional margin.

**III. Impact Summary**

In every measurable category, the Radio 4461 proposed for installation is equal to or less impactful than the Radio 4890 depicted on the superseded drawings:

Parameter	Radio 4890 (Superseded)	Radio 4461 (Proposed)
Weight	67.24 lbs	24.25 lbs (-64%)
Dimensions (H x W x D)	20.6” x 15.67” x 7.04”	13.58” x 10.25” x 4.45”
Wind Load Area	≈2.24 sq ft	≈0.97 sq ft (-57%)
Cooling Method	Active (fan)	Passive (no fan)
Noise at 25°C	55.5 dBA @ 1m	36 dBA @ 1m (-19.5 dBA)
RF Emissions	N/A (antenna-driven)	No change

**IV. Comprehensive Record of Responses**

For the County’s convenience, the following summarizes all responsive documents provided for PLN2025-00235 in connection with the community member’s comments:

- **April 29, 2026:** Response letter addressing noise study methodology, equipment identification, passive cooling characterization, and PE license validity (submitted to County)
- **April 30, 2026:** Response regarding EME Report aerial photograph annotation and RF compliance analysis validity; submitted PPK1\_05 EME Report (October 30, 2025)
- **May 1, 2026 (this letter):** Corrected October 14, 2025 construction drawing sets for PLN2025-00234 and PLN2025-00235; Ericsson Radio 4461 specification sheet to follow next week

## V. Request

**AT&T respectfully requests that the County proceed with the scheduled May 7, 2026 hearing without continuance.** The corrected construction drawings resolve the document-version discrepancy that gave rise to the community member's concerns. No re-notice, re-certification, or revised technical study is warranted. The application materials are complete, accurate, and compliant.

AT&T reserves all rights under 47 U.S.C. §§ 253 and 332(c)(7) and 47 C.F.R. § 1.6003, including all rights regarding the applicable shot clock deadlines previously preserved in AT&T's February 27, 2026 resubmittal letter.

AT&T Mobility is available to discuss any aspect of this response with County staff and remains committed to working cooperatively with the County and the community to advance these Applications.

Sincerely,

### **Tasha Stack**

NextEdge Networks LLC

On behalf of AT&T Mobility LLC

  
cc: ~~Supervisor Ray Mueller~~

*Marc Grabisch, AT&T Program Manager*

### **Enclosures:**

- CRAN\_RSFR\_PAPK1\_04 Construction Drawing Set, Rev 0, October 14, 2025
- CRAN\_RSFR\_PAPK1\_05 Construction Drawing Set, Rev 0, October 14, 2025

**VIA EMAIL**  
April 29, 2026

County of San Mateo  
Planning & Building Department  
225 37th Avenue  
San Mateo, California 94403

Attn: Luis Topete, Planner III

**Re:** Response to Public Comment of Tomas Barreto Regarding  
AT&T Small Wireless Facility in the Public Right-of-Way  
**CRAN\_RSFR\_PAPK1\_05** (near) 1888 Cordilleras Road (PLN2025-00235)

Dear Luis,

On behalf of AT&T Mobility LLC, this letter responds to the public comment submitted by Tomas Barreto (the “Comment”) regarding Application PLN2025-00235 for site CRAN\_RSFR\_PAPK1\_05. AT&T appreciates the County’s diligence in forwarding community input and addresses each of Mr. Barreto’s four objections below. As demonstrated herein, each objection is based on factual misreadings of the application record and does not warrant a continuance, re-notice, or any revision to the submitted materials.

## **I. Public Notice Adequacy**

### **A. The Objection**

Mr. Barreto contends that the public notice identifying the project location as “(Near) 1888 Cordilleras Road” is insufficiently specific because two poles exist in the vicinity, and that the County should re-notice with GPS coordinates or a pole identification number.

### **B. Response**

The public notice for this Application fully complies with all applicable noticing requirements. The “(Near) [address]” format is the standard noticing convention used by the County of San Mateo Planning & Building Department for all wireless facility applications in the public right-of-way, where no site-specific street address exists for a utility pole. This format is consistent with the County’s own noticing practices across multiple jurisdictions and application types.

Moreover, the application record removes any claimed ambiguity:

- **PG&E Pole Number 121623724** is identified on the Title Sheet (T-1), the Survey (C-1), and multiple plan sheets throughout the 100% Construction Drawing set submitted with the Application.
- **Exact GPS coordinates** (Latitude: 37.473252, Longitude: -122.266346) are specified on the Title Sheet, the Survey, and the Site Plan.
- **A pole photograph** of the specific host structure is included on the Title Sheet.

- **The site type** is identified as “PG&E WOOD UTILITY POLE” on the Title Sheet, distinguishing it from any other structure type (such as a lift station pole) in the vicinity.

The public notice is designed to alert the community to a proposed project and direct them to the application file where complete details are available for review. The notice accomplished precisely that purpose. Mr. Barreto himself successfully identified the project, reviewed the application materials, and submitted detailed comments, demonstrating that the notice fulfilled its statutory function. No re-notice is required.

## II. Hardware Identification: Radio 4490, Not Radio 4890

### A. The Objection

Mr. Barreto alleges that the Noise Assessment omits the “Radio 4890,” which he claims is “the actual hardware intended for the site,” and that this omission constitutes a “material error” invalidating the noise findings.

### B. Response: The Radio 4890 Is Not Proposed for This Site

**This objection is based on a factual misreading of the application documents. No Radio 4890 is proposed for installation at CRAN\_RSFR\_PAPK1\_05.** The proposed equipment is the Radio 4490 and the Radio 4461, as confirmed by every controlling document in the application record:

Document	Reference Location	Equipment Specified
Title Sheet (T-1)	Project Scope / Description	Radio 4490 and Radio 4461
Equipment Details (D-1)	Detail 3 and Detail 5	Radio 4490 (or Approved Equal) and Radio 4461
Electrical Load Calculations (E-3)	Detail 10	Radio 4490: 989W, 10.3A Radio 4461: 240W, 2.5A
One-Line Diagram (E-2)	Grounding Schematic	Radio 4490 and Radio 4461
Elevations (A-3, A-4)	Front and Side Elevations	Radio 4490 w/ PSU and Radio 4461 w/ PSU
Noise Assessment (Table 1)	Proposed Equipment	Ericsson 4461 (36 dBA) and Ericsson 4490 (26 dBA)

**Six independent documents in the application record uniformly identify the Radio 4490 and Radio 4461 as the proposed equipment.** The Radio 4890 does not appear in any project scope, any equipment plan, any electrical calculation, any elevation drawing, or any equipment specification detail in the construction drawing set.

### C. Source of Mr. Barreto’s Confusion: Appendix B Reference Materials

Mr. Barreto appears to have conflated the *reference manufacturer specification sheets* included in Appendix B of the Noise Assessment with the *actual proposed equipment* identified in the body of the report (Table 1). This is an understandable but fundamental misreading.

Appendix B of the Noise Assessment contains excerpted manufacturer specification sheets for multiple Ericsson radio models, including the Radio 4490HP, the Radio 4890HP, and the Radio 4467. These appendix materials are included as supporting reference documentation to demonstrate the methodology by which the noise consultant identified acoustic properties of equipment in the Ericsson product family. They do not represent and were never intended to represent the equipment proposed for installation.

**The controlling equipment identification is Table 1 of the Noise Assessment**, which lists only the Radio 4461 and Radio 4490, the same equipment specified in the Title Sheet scope, the equipment details, the electrical load calculations, the one-line diagram, and every elevation drawing in the construction document set.

## III. Passive vs. Active Cooling Characterization

### A. The Objection

Mr. Barreto alleges “Active Cooling Fraud,” claiming the Noise Assessment falsely characterizes the proposed equipment as “passive cooling” while the manufacturer datasheets in Appendix B reference fan-equipped models.

### B. Response

This objection conflates two distinct issues and does not withstand scrutiny.

**First**, the characterization of “passive cooling” in the Noise Assessment’s Table 1 accurately describes the proposed Radio 4490 and Radio 4461 units at their baseline operating condition. The sound pressure levels used in the noise calculation (26 dBA for the Radio 4490 and 36 dBA for the Radio 4461, each measured at 1 meter) represent the equipment’s acoustic output under normal operating conditions. These values are drawn directly from the manufacturer’s published specifications for the specific models proposed.

**Second**, even if one were to apply the higher temperature-dependent fan-activated sound levels from the manufacturer’s specifications, the compliance conclusion does not change. The Ericsson specification data for the Radio 4490HP shows that at +25°C (77°F), the maximum sound pressure level with fan operation is 29 dBA at the loudest face (the back). The Radio 4461 (referenced in Appendix B as Radio 4467, which shares the same acoustic platform) shows 38 dBA at +25°C with fan. Even combining these higher values using logarithmic decibel addition and propagating them to the nearest property line at 6.29 feet, the calculated contribution remains well below the County’s 50 dBA nighttime residential limit under San Mateo County Noise Control Code § 4.88.320.

**Third**, it bears emphasis that the sound pressure levels Mr. Barreto cites (73.5 dBA) correspond to the Radio 4890HP operating at +55°C (131°F), a temperature condition that is not representative of the Emerald Hills, California operating environment and, critically, pertains to equipment that is not proposed for this site. Applying extreme-temperature specifications for non-proposed equipment to invalidate a study of the actual proposed equipment is analytically unsound.

The allegation of “fraud” is therefore unfounded. The Noise Assessment correctly identifies the proposed equipment, correctly applies manufacturer acoustic data for that equipment, and correctly concludes compliance with applicable noise standards.

## **IV. Professional Engineer Seal and License Status**

### **A. The Objection**

Mr. Barreto notes that the Professional Electrical Engineer’s license (Michael McGuire, PE, License #E18898) expired on September 30, 2025, and characterizes the Noise Assessment as an “orphan report” that cannot support a current permit application.

### **B. Response**

This objection misunderstands the legal framework governing professional engineering certifications. The relevant facts and applicable law are as follows:

- **Date of Report Certification:** June 2, 2025.
- **License Expiration Date:** September 30, 2025.
- **Date of Application Filing:** July 22, 2025.
- **Status at Time of Seal:** Active and in good standing.

The Noise Assessment was prepared, sealed, and certified while Mr. McGuire’s license was fully active. The application was filed with the County while the license was fully active. Under California Business and Professions Code § 6762 and the regulations of the California Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG), a professional engineering document is valid as of the date it is sealed. There is no statutory or regulatory requirement that a certifying engineer’s license remain active through the entire duration of a local jurisdiction’s permit review process. If such a requirement existed, it would effectively invalidate any engineering report whenever a license renewal cycle elapsed during a pending application, an absurd result that no jurisdiction applies.

The relevant inquiry is whether the professional was licensed at the time the work was performed and the document was sealed. The answer here is unambiguously yes. The Noise Assessment is a valid, properly certified professional engineering document.

Furthermore, it is worth noting that license renewal is an administrative process. A lapsed license does not retroactively invalidate work product completed during the active period, nor does it suggest any deficiency in the technical analysis. The California BPELSG has never interpreted

its regulations to require that engineering certifications be “refreshed” based on subsequent license renewal status.

## V. Summary and Request

Each of Mr. Barreto’s four objections has been addressed and shown to lack factual and legal merit:

Objection	Finding
1. Public Notice	Notice complies with County standards. Pole number, GPS coordinates, pole photo, and site type are all in the application record. Mr. Barreto’s own detailed comment demonstrates the notice achieved its statutory purpose.
2. Hardware Discrepancy	The Radio 4890 is not proposed for this site. Six independent documents confirm the proposed equipment is the Radio 4490 and Radio 4461. Mr. Barreto misread Appendix B reference materials as proposed equipment.
3. Cooling Characterization	The Noise Assessment correctly characterizes and calculates acoustic levels for the proposed equipment. Even under fan-activated conditions at realistic ambient temperatures, the equipment complies with County noise standards by a significant margin.
4. PE License	The report was sealed June 2, 2025, while the license was active. The application was filed July 22, 2025, while the license was active. No law requires a license to remain active during permit review.

**AT&T respectfully requests that the County proceed with the scheduled May 7, 2026 hearing without continuance.** The application materials are complete, accurate, and compliant. No re-notice, re-certification, or revised noise study is warranted based on the Comment. AT&T reserves all rights under 47 U.S.C. §§ 253 and 332(c)(7) and 47 C.F.R. § 1.6003, including all rights regarding the applicable shot clock deadlines previously preserved in AT&T’s February 27, 2026 resubmittal letter.

AT&T Mobility is available to discuss any aspect of this response with County staff and remains committed to working cooperatively with the County and the community to advance this Application.

Sincerely,



**Tasha Stack**  
NextEdge Networks LLC  
On behalf of AT&T Mobility LLC

*cc: Supervisor Ray Mueller  
Marc Grabisch, AT&T Program Manager*

**From:** [Tasha Stack](#)  
**To:** [Luis Topete](#)  
**Cc:** [Caroline Styc](#)  
**Subject:** RE: PLN2025-00235 (CRAN\_RSFR\_PAPK1\_05) - Response to Community Comment Regarding RF Emissions Compliance Report  
**Date:** Thursday, April 30, 2026 11:14:58 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[PAPK1\\_05\\_EME\\_Aerial\\_Clarification.pptx](#)

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Hi Luis,

We are writing in response to a concern raised by a community member regarding the aerial photograph used in the Radio Frequency Emissions Compliance Report ("EME Report") prepared by Waterford Consultants, LLC for site CRAN\_RSFR\_PAPK1\_05 (PLN2025-00235). We appreciate the community member's attentiveness to the application materials, and we want to address this matter directly and transparently.

The community member has correctly observed that the satellite image annotation in Figure 1 of the EME Report does not precisely depict the pole marker at the correct location within the Cordilleras Road public right-of-way. We acknowledge this visual discrepancy and have requested that Waterford Consultants issue a corrected report with updated aerial imagery for the record. A side-by-side comparison of the EME Report figure and verified Google Earth imagery is attached for reference.

#### **Validity of the RF Compliance Analysis**

While the aerial photograph annotation requires correction, we wish to make clear that this discrepancy is limited to the illustrative satellite image overlay and has no bearing on the computational RF emissions analysis or its conclusions. The following verified technical parameters, which form the actual inputs to the predictive modeling, are consistent across the EME Report, the 100% Construction Drawing set, and the Alternative Site Analysis submitted with this application:

Site coordinates: 37.473252  N / -122.266346  W  
Replacement pole height: 33'-0" AGL  
Antenna centerline: 34'-11" (34.9') AGL  
Antenna model: Gamma Nu DOY9X360F16T4 omnidirectional canister  
Operating frequencies and transmitter power output per Appendix A

The EME Report's computational modeling was performed using these verified site-specific parameters in accordance with the methodologies prescribed by FCC OET Bulletin 65, not from the aerial photograph. The satellite image serves only as a visual reference and is not an input to the RF power density calculations. The analysis determined that the maximum predicted power density at accessible ground-level locations is **0.97% of the FCC General Population exposure limits**, providing a margin of safety that is more than ***100 times below*** the applicable threshold.

Furthermore, the analysis conservatively assumes all RF emitters are operating at 100% duty cycle simultaneously, which represents a theoretical maximum-case scenario. Actual operating conditions will produce lower exposure levels than those reported.

#### **Federal Regulatory Framework**

As the County is aware, RF emissions compliance for wireless telecommunications facilities is governed exclusively by federal law. Under Section 332(c)(7)(B)(iv) of the Telecommunications Act of 1996 (47 U.S.C. Section 332), no state or local government may regulate the placement, construction, or modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the FCC's regulations concerning such emissions. The EME Report, prepared and certified by a California-licensed Professional Electrical Engineer in accordance with 47 C.F.R. Sections 1.1307(b)(3) and 1.1310, demonstrates that the proposed facility will comply with all applicable FCC RF exposure limits.

The proposed operation will not expose members of the general public to hazardous levels of RF energy at ground level or in adjacent buildings.

#### **Corrective Action**

A corrected EME Report with updated aerial imagery accurately depicting the pole location will be provided for the project file. We want to emphasize that the corrected report will reflect no material changes to the analysis methodology, input parameters, calculated results, or compliance determination. The correction is limited to the visual depiction of the site in the illustrative figures.

We respectfully request that this response be included in the record for the May 7, 2026 Zoning Hearing Officer hearing. Please do not hesitate to contact us if you have any questions or require additional information.

Respectfully submitted,

Tasha Stack



**Tasha Stack**  
Consultant on behalf of AT&T  
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## CRAN\_RSFR\_PAPK1\_05 EME Report: Aerial Image Clarification

EME Report Figure 1 (Waterford Consultants)



Figure 1: Antenna Locations

Google Earth - Verified Pole Location



### Clarification Statement

A community member has identified that the aerial photograph used in Figure 1 of the Waterford Consultants EME Report (dated May 2, 2025) does not accurately depict the correct pole location within the Cordilleras Road public right-of-way. The red arrow annotation in the EME report image appears offset from the actual PAPK1\_05 pole site, as confirmed by the Google Earth image showing the verified coordinates (37.473252, -122.266346).

**However, the underlying RF compliance analysis remains valid.** The computational modeling was performed using these correct site parameters, not the aerial photograph. The discrepancy is limited to the visual placement of the pole marker on the satellite image used for illustrative purposes. A corrected report with an updated aerial image has been requested from Waterford Consultants.