

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

DATE: June 18, 2026

TO: Zoning Hearing Officer

FROM: Planning Staff

SUBJECT: Consideration of a Use Permit Renewal and Amendment, pursuant to Chapters 8.280 and 8.376 of the County Zoning Regulations, to allow the continued operation, and minor modification of a cellular communications facility consisting of two 12-foot monopoles, and one 8-foot monopole mounted to concrete piers, and a 300-square foot enclosed equipment area located at 7400-A Stage Road in the unincorporated San Gregorio area of San Mateo County.

County File Number: PLN1999-00776 (T-Mobile)

PROPOSAL

The applicant is requesting a Use Permit Renewal and Amendment for the continued operation and modification of an existing T-Mobile (formerly Sprint) wireless telecommunications facility located at 7400-A Stage Road in the unincorporated San Gregorio area of San Mateo County. The facility was originally constructed and operated by Sprint PCS. T-Mobile acquired Sprint in 2020 and has been gradually modifying and upgrading existing Sprint facilities to incorporate T-Mobile's cellular technology.

The existing facility includes two 12-foot monopoles and one 8-foot monopole, each supporting two antennas. These existing antennas are proposed to be removed and replaced with new T-Mobile antennas, maintaining the current configuration of two antennas per monopole, along with associated mounting hardware and equipment owned by T-Mobile.

In addition, an existing 300-square-foot equipment area, enclosed by chain-link fencing with redwood slats, is located downhill from the antennas and has historically housed Sprint's equipment cabinets. The two existing Sprint equipment cabinets will be removed and replaced with two T-Mobile equipment cabinets to support T-Mobile's cellular systems.

The applicant proposes to remove Sprint's wireless telecommunications equipment and replace it with T-Mobile equipment, including three new concrete pier foundations constructed in the same locations to support new 12-foot, 11-inch monopole masts and mounts. These structures will accommodate six new antennas (two per monopole), six remote radio units (RRUs) with associated cabling, two equipment cabinets housing backup batteries, and an electrical panel.

All new T-Mobile equipment will be installed in approximately the same locations as the existing Sprint equipment to be removed. As a result, disturbance to the site will be minimal.

RECOMMENDATION

That the Zoning Hearing Officer approves the Use Permit Renewal and Amendment, County File Number PLN1999-00776, by adopting the required findings and conditions of approval identified in Attachment A.

BACKGROUND

Report Prepared By: Randall Cohen, Project Planner, Telephone 650/383-4658

Applicant: Eric Lentz for T-Mobile

Owner: Mary An Bordi Trust

Second Owner: Thomas Hudson Armstrong Trust

Public Notification: Ten-day advanced notification for the hearing was mailed to property owners within 300 feet of the project parcel and a notice for the hearing posted in a newspaper (San Mateo County Times) of general public circulation on June 6, 2026.

Location: 7400-A Stage Road, San Gregorio

APN: 081-240-020

Size: 49.25 acres

Existing Zoning: PAD/CD (Planned Agricultural District/Coastal Development)

General Plan Designation: Agriculture

Existing Land Use: Existing residence, dry grazing, and other cellular facilities

Flood Zone: FEMA Flood Zone Map indicates the parcel is located in Zone C, (areas of minimal flooding) per Community Panel No. 06081C0359F, effective August 2, 2017.

Environmental Evaluation: This project is categorically exempt pursuant to Section 15301, Class 1 of the California Environmental Quality Act as a continued operation of an existing facility with no expansion of use.

Setting: The parcel is located approximately 0.15 miles south of the intersection of La Honda Road (Highway 84) and Stage Road, and approximately 0.63 miles from Cabrillo Highway (Highway 1). The site is situated on a flat ridge in the northern portion of the parcel, with the equipment area located downslope from the antennas. The antennas are arranged around an existing tree, and the fenced equipment area is screened by surrounding trees. Two additional, separately permitted wireless telecommunications facilities—AT&T (7400-B Stage Road) and Verizon (7400-C Stage Road)—are located on site in close proximity to the existing Sprint facility proposed for replacement by T-Mobile.

Chronology:

<u>Date</u>	<u>Action</u>
April 17, 2001	- Final approval of Sprint facility Use Permit and Coastal Development Permit PLN1999-00776 granted. Facility constructed under BLD2000-00207.
June 30, 2004	- Application submitted by Nextel for a new co-location at subject site, PLN2004-00321.
April 21, 2005	- Administrative Review submitted by Sprint, per PLN1999-00776 condition of approval.
May 17, 2005	- Final approval of Cingular Wireless (currently AT&T) facility PLN 2003-00487 granted. Facility constructed under BLD2005-00651.
February 27, 2006	- County received notification that Sprint has acquired Nextel. Nextel Use Permit PLN2004-00321 closed. Sprint revised 2005 Administrative Review to include an amendment to modify their existing facility to incorporate Nextel's antennas and equipment.
April 18, 2006	- Sprint's Use Permit Renewal and Amendment (for PLN1999-00776) deemed incomplete pending additional information from the applicant.
January 16, 2009	- Final approval of Verizon Wireless facility PLN2007-00469 granted. Facility constructed under BLD2009-00140.

- February 4, 2010 - Sprint submitted formal application and materials for PLN1999 00776 Use Permit Renewal of existing facility and confirmed previous amendment (to construct Nextel's equipment) is no longer being pursued.
- June 17, 2010 - Use Permit Renewal Approved at Zoning Hearing Officer meeting.
- January 27, 2026 - Use Permit Renewal initiated.
- March 20, 2026 - Use Permit Application deemed complete.
- June 18, 2026 - Zoning Hearing Officer meeting.

DISCUSSION

A. KEY ISSUES

1. Conformance with General Plan

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

Chapter 4 - Visual Quality

Policy 4.20 (*Utility Structures*) requires minimization of visual impacts generated by utility structures. The equipment cabinet area continues to be tucked behind the hillside on which the antennas are located and continue to not be visible from public roads or other viewing areas. The new antennas will not be visible from adjacent public roads due to their relatively small mass and distance from viewing points. The antennas will continue to be painted in earthtone colors to blend them into the surrounding vegetation. The project has generated negligible visual impact.

2. Conformance with Wireless Telecommunications Facilities Ordinance

According to Section 8.376.030(VI) of the County Ordinance Code (Wireless Telecommunication Facilities Regulations), existing facilities built prior to January 9, 2009, are subject to the provisions of the Code related to new facilities. Staff has reviewed the project against the provisions of the Regulations and determined that the project complies with the applicable standards discussed below.

Section 8.376.030(II)(D) requires that new wireless telecommunication facilities (WTF) must be constructed so as to accommodate co-location and must be made available for co-location unless technologically infeasible,

except where aesthetically inappropriate. There are two other cellular phone companies co-located on this parcel. There is no aspect of the existing or proposed project that would prohibit additional co-location.

Sections 8.376.030(II)(E-G) govern the appearance of the WTF. Subsection F requires painting of antennas and other visible equipment to mitigate visual impacts. The existing antennas are painted in earthtones in order to blend into the surrounding vegetation. The new antennas will also be painted in earthtones to match.

Pursuant to Section 8.252.050 of the County Ordinance Code, this project does not require a Coastal Development Permit because this Use Permit Renewal is not a project as defined in Section 8.252.040(r).

3. Use Permit Findings

Under the provisions of Chapter 8.280 (Use Permits), wireless telecommunication facilities are permitted in the Planned Agricultural District/Coastal Development (PAD/CD) Zoning District after issuance of a use permit. In order to continue the operation of this facility, the following use permit findings are necessary:

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

This facility has been in operation since 2002, with no reported complaints from the surrounding community. According to the most recent radio frequency (RF) report prepared for this project by Global Technology Associates dated July 31, 2025 the project is compliant with the Federal Communications Commission (FCC) rules and regulations. The maximum cumulative power density at ground level within areas subject to restricted access near the T-Mobile antennas is projected to be 2,637.8 percent of the FCC's most restrictive general population exposure limit. Compliance with FCC radiofrequency (RF) exposure standards will be maintained through continued implementation of required warning signage and access-control measures.

A result of over 100 percent does not make a site out of compliance with FCC guidelines. For predicted EME over 100 percent of the applicable FCC limit, a mitigation plan (e.g. installation of signages and/or barriers/stripping to prevent the access) is required to consider the site compliant. Areas exceeding the FCC limit are presented with the barriers and appropriate signages. Accessible areas outside the demarcated areas are considered the safety zones that have predicted EME values below the FCC's limits. Installation of the recommended mitigation measures ensures that the site remains fully compliant. The prediction models antennas as if they are operating at full power, and this assumption yields a worst-case scenario with more conservative results. On-site measurements may yield different results, as antennas do not always operate at full capacity.

The facility will continue to operate on an unmanned basis and will require only periodic maintenance visits. Because no substantial changes to the facility are proposed, continued operation will not result in significant increases in traffic, noise, or overall site activity and will not significantly intensify the existing use of the property.

- b. **That the proposed project is necessary for the public health, safety, convenience or welfare.**

The renewal of this use permit will allow for continued cellular communication coverage for private citizens and public agencies. Community members, business persons, and residents have come to rely on coverage provided by this site to facilitate daily conversation and to provide assistance in emergency situations. Furthermore, there is no evidence to suggest that the operation of this facility has caused a detriment to the public health or safety since its establishment.

B. COMPLIANCE WITH CONDITIONS OF LAST APPROVAL

Indicated below are the conditions of approval from the last approved Use Permit Renewal, (June 17, 2010). Following each condition is staff's analysis of condition compliance and whether a particular condition should be retained or modified.

Planning Division

1. This approval applies only to the proposal, documents and plans described in this report and submitted to and approved by the Planning Commission on June 17, 2010. Minor revisions or modifications to the project may be approved by the Community Development Director if they are consistent with the intent of and in substantial conformance with this approval.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes, but modified to reflect the current date and to read “Minor modifications to the project may be approved by the Director, Planning and Building if they are consistent with the intent of, and in substantial conformance with, this approval.”

2. The use permit shall be valid for 10 years from the date of final approval, and shall expire on June 17, 2036. The applicant shall apply for renewal of the use permit, and pay applicable renewal fees six months prior to expiration if continuation of this use is desired. There shall be an administrative review for compliance with conditions of approval of this use permit in June 2031.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes, but modified to change the duration of the Use Permit to 10 years pursuant to Section 65964(b) of the Government Code and to read:

“The applicant shall apply for renewal of the use permit, and pay applicable renewal fees, six months prior to expiration if continuation of this use is desired. There shall be an administrative review for compliance with conditions of approval of this use permit in June 2031.”

3. Any change in use or intensity shall require an amendment to the use permit and coastal development permit. Amendment to this use permit and coastal development permit requires an application for amendment, payment of applicable fees, and consideration at a public hearing.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

4. The applicant shall receive and maintain all necessary licenses and registrations from the Federal Communications Commission (FCC) and any other applicable regulatory bodies for the operation of the subject facility at this site. The applicant shall supply the Current Planning Section with evidence of such licenses and registrations. If any required license is ever revoked, the applicant shall inform the Current Planning Section of the revocation within 10 days of receiving notice of such revocation.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

5. The applicant shall maintain the chain link fence with slats in good condition and perform repairs as necessary to continue its function as a screening device for the equipment cabinets. Any damage to the fence shall be promptly repaired. In addition, the applicant shall maintain the colors and access road in good condition. All maintenance and/or repairs shall match the appearance, materials, and workmanship as originally constructed.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

6. The applicant shall maintain the existing trees and shrubs screening the facility in good condition for the life of the project.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

7. The applicant shall maintain permanent stormwater control measures, which include Best Management Practices (BMPs), for the life of the project.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

8. This facility and all equipment associated with it shall be removed in its entirety by the applicant within 90 days if the FCC license and registration are revoked or if the facility is abandoned or no longer needed. The owner and/or operator of the facility shall notify the Current Planning Section upon abandonment of the facility.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

9. The installation shall be removed in its entirety at that time when this technology becomes obsolete or this facility is no longer needed.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

10. There shall be no external lighting associated with this use. Wireless telecommunication facilities shall not be lighted or marked unless required by the FCC or Federal Aviation Administration (FAA).

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

California Department of Forestry

11. The applicant must display the assigned physical address of 7400-A Stage Road in a manner so that emergency response units will be able to easily and quickly locate the site.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

12. In the event the access gate into the cellular facility is to be locked, the San Mateo County Fire Department will require the installation of a Knox Box or Knox Padlock to allow rapid response of emergency vehicles onto your property in case of a fire or medical emergency. For an application or further information please contact the San Mateo County Fire Marshal's Office at 650/573-3846

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

13. A Knox Box or Knox Padlock is required to be installed and maintained at the entrance to the fenced equipment area.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

14. Emergency access shall be maintained at all times per the following requirements: Site access to equipment shall be a minimum 12-foot-wide road with approved turnouts every 400 feet. Emergency access roads shall be designed and maintained to support the weight of a 75,000-lb. fire apparatus and shall have a surface providing all-weather driving capabilities. If class 2 aggregate base, or equivalent, is proposed, it shall be compacted to 95 percent and require an engineer's certification at final. Grades of 15- to 20 percent shall require 2 inches of asphalt concrete or the equivalent, with a non-skid surface. Grades over 15 percent shall require the approval of the Fire Marshal and shall be limited in length. No grades shall be over 20 percent. The centerline turning radius for emergency apparatus access roads shall be 35 feet.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes

15. This project shall maintain a minimum of one 20-foot-wide hammerhead “T” with 35-foot “wings.” The surface shall meet fire access road requirements.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes

16. Maintain around and adjacent to such buildings or structures a fuelbreak/firebreak made by removing and clearing away flammable vegetation for a distance of not less than 30 feet around the perimeter of all structures, or to the property line, if the property line is less than 30 feet from any structure. Existing trees around the equipment cabinet shall be limbed up 6 feet to 10 feet from the ground.

Compliance with Condition? Yes.

Recommend to Retain Condition? Yes.

In addition, a project referral for this pending use permit renewal was sent to the San Mateo County Fire Marshal for review. As a result, the Department has recommended conditional approval and is subject to field inspection and required test.

C. ENVIRONMENTAL REVIEW

This project is categorically exempt pursuant to Section 15301, Class 1 of the California Environmental Quality Act as a continued operation of an existing facility with no expansion of use.

D. REVIEWING AGENCIES

Building Inspection Section
Department of Public Works
CalFire

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Site Plan
- D. Elevations
- E. Enlarged Elevations
- F. Radio Frequency Report

County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN1999-00776

Hearing Date: June 18, 2026

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

RECOMMENDED FINDINGS

For the Environmental Review, Find:

1. That the project is exempt from environmental review, per Section 15301, Class 1, of the California Environmental Quality Act, as a continued operation of the existing facility with no expansion of use. A Categorical Exemption will be filed, upon final approval of the project.

For the Use Permit, Find:

2. That the establishment, maintenance and/or conducting of the use will not, under the circumstances of the particular case, be detrimental to the public welfare or injurious to property or improvements in said neighborhood. According to the most recent radio frequency (RF) report prepared for this project by Global Technology Associates dated July 31, 2025, the project is compliant with the Federal Communications Commission (FCC) rules and regulations. The maximum cumulative power density level for anywhere at ground level near the T-Mobile antennas is projected to be 2637.8 percent of FCC's general population limit of the most restrictive public exposure limit. However, with continued placement of required safety signage and restricted access, the project complies with the FCC's exposure limits. Furthermore, the facility will continue to be non-staffed and require only minimal routine service visits. The continued operation of this facility will not generate significant traffic, noise, or significantly intensify the use of the property since no changes are proposed to the facility.
3. That the continued operation is necessary for the public health, safety, convenience or welfare, since the facility will continue to allow for cellular communications coverage for private citizens and public agencies that have come to rely on coverage provided by this site to facilitate daily conversation and to provide assistance in emergency situations. Furthermore, there is no evidence to suggest that the operation of this facility has caused a detriment to the public health or safety since its establishment.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal, documents and plans described in this report as submitted and approved by the Zoning Hearing Officer on June 18, 2026. Minor modifications to the project may be approved by the Director, Planning and Building if they are consistent with the intent of, and in substantial conformance with, this approval.
2. The use permit shall be valid for 10 years from the date of final approval, and shall expire on June 18, 2036. The applicant shall apply for renewal of the use permit, and pay applicable renewal fees six months prior to expiration if continuation of this use is desired. There shall be an administrative review for compliance with conditions of approval of this use permit in June 2031.
3. Any change in use or intensity shall require an amendment to the use permit and coastal development permit. Amendment to this use permit and coastal development permit requires an application for amendment and coastal development permit, payment of applicable fees, and consideration at a public hearing.
4. The applicant shall receive and maintain all necessary licenses and registrations from the Federal Communications Commission (FCC) and any other applicable regulatory bodies for the operation of the subject facility at this site. The applicant shall supply the Current Planning Section with evidence of such licenses and registrations. If any required license is ever revoked, the applicant shall inform the Current Planning Section of the revocation within 10 days of receiving notice of such revocation.
5. The applicant shall maintain the chain link fence with slats in good condition and perform repairs as necessary to continue its function as a screening device for the equipment cabinets. Any damage to the fence shall be promptly repaired. In addition, the applicant shall maintain the colors and access road in good condition. All maintenance and/or repairs shall match the appearance, materials, and workmanship as originally constructed.
6. The applicant shall maintain the existing trees and shrubs, screening the facility in good condition for the life of the project.
7. The applicant shall maintain permanent stormwater control measures, which include Best Management Practices (BMPs), for the life of the project.

8. This facility and all equipment associated with it shall be removed in its entirety by the applicant within 90 days if the FCC license and registration are revoked or if the facility is abandoned or no longer needed. The owner and/or operator of the facility shall notify the Current Planning Section upon abandonment of the facility.
9. The installation shall be removed in its entirety at that time when this technology becomes obsolete or this facility is no longer needed.
10. There shall be no external lighting associated with this use. Wireless telecommunication facilities shall not be lighted or marked unless required by the FCC or Federal Aviation Administration (FAA).

California Department of Forestry

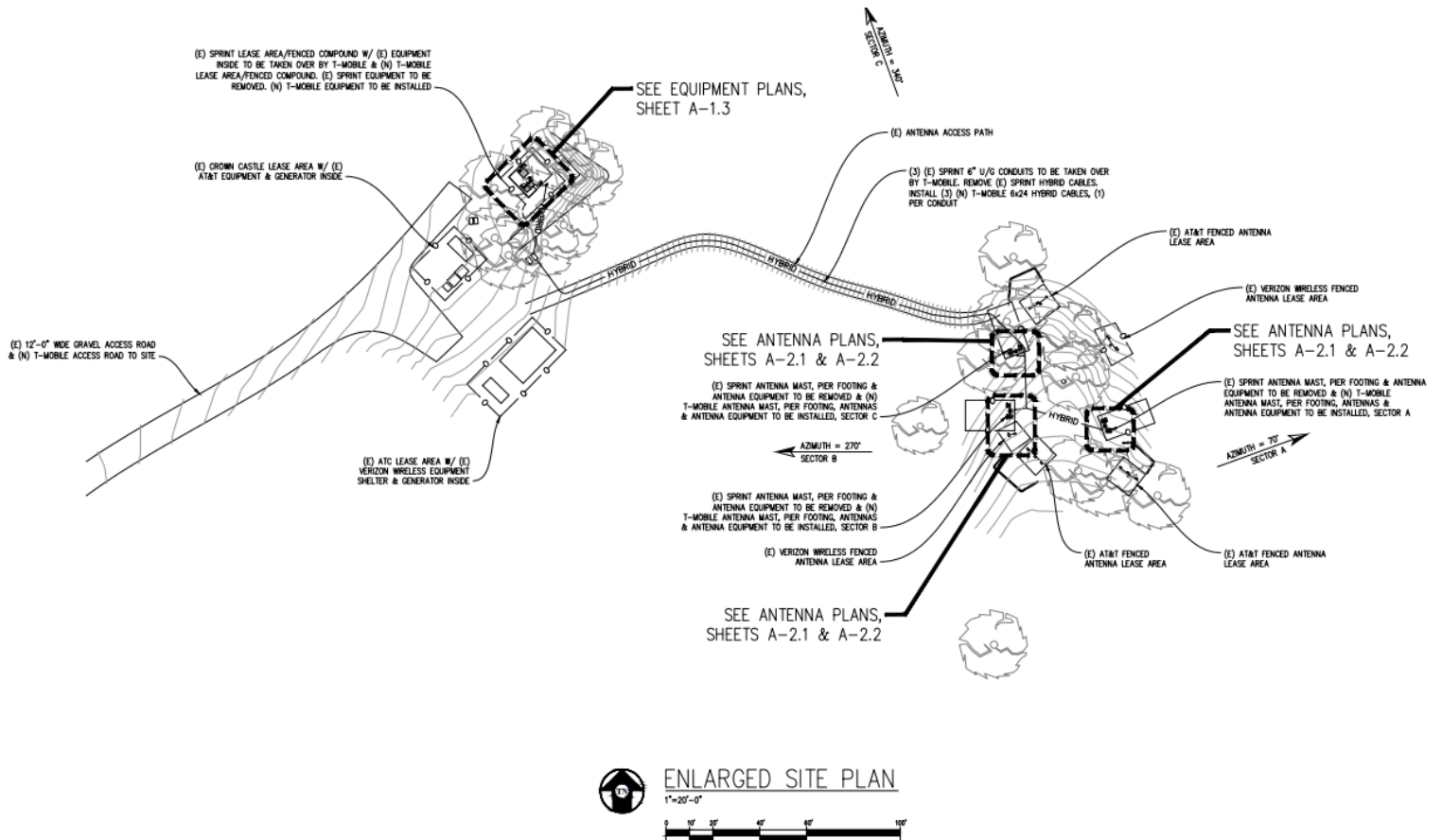
11. The applicant must display the assigned physical address of 7400-A Stage Road in a manner so that emergency response units will be able to easily and quickly locate the site.
12. In the event the access gate into the cellular facility is to be locked, the San Mateo County Fire Department will require the installation of a Knox Box or Knox Padlock to allow rapid response of emergency vehicles onto your property in case of a fire or medical emergency. For an application or further information please contact the San Mateo County Fire Marshal's Office at 650/573-3846.
13. A Knox Box or Knox Padlock is required to be installed and maintained at the entrance to the fenced equipment area.
14. Emergency access shall be maintained at all times per the following requirements: Site access to equipment shall be a minimum 12-foot-wide road with approved turnouts every 400 feet. Emergency access roads shall be designed and maintained to support the weight of a 75,000-pound fire apparatus and shall have a surface providing all-weather driving capabilities. If class two aggregate base, or equivalent, is proposed, it shall be compacted to 95 percent and require an engineer's certification at final. Grades of 15- to 20 percent shall require 2 inches of asphalt concrete or the equivalent, with a non-skid surface. Grades over 15 percent shall require the approval of the Fire Marshal and shall be limited in length. No grades shall be over 20 percent. The centerline turning radius for emergency apparatus access roads shall be 35 feet.
15. This project shall maintain a minimum of one 20-foot-wide hammerhead "T" with 35-foot "wings." The surface shall meet fire access road requirements.

16. Maintain around and adjacent to such buildings or structures a fuelbreak/firebreak made by removing and clearing away flammable vegetation for a distance of not less than 30 feet around the perimeter of all structures, or to the property line, if the property line is less than 30 feet from any structure. Existing trees around the equipment cabinet shall be limbed up 6 feet to 10 feet from the ground.
17. Compliance with the conditions of this permit shall be maintained at all times.

VICINITY MAP

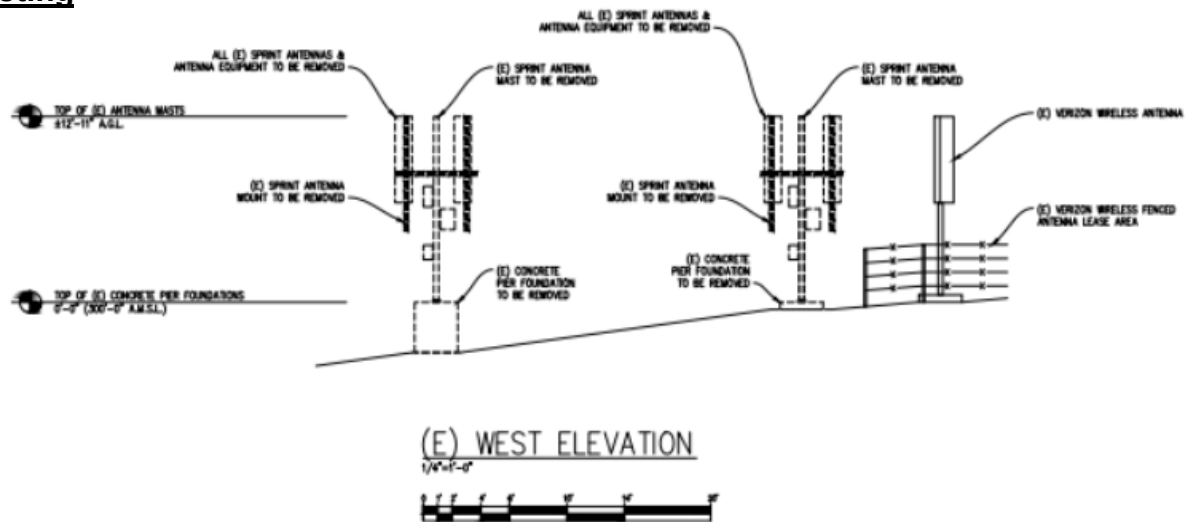


Site Plan

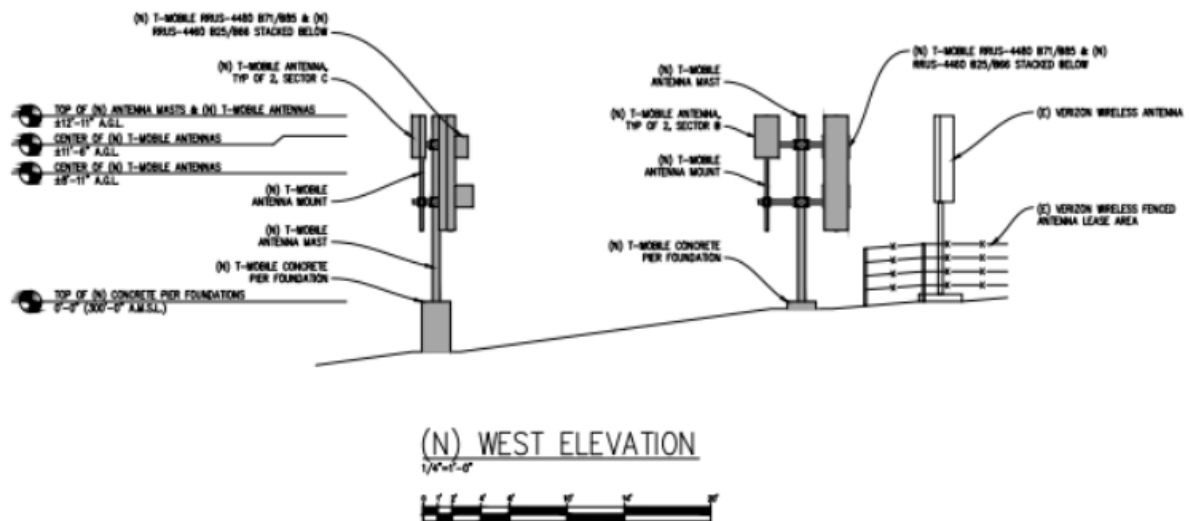


Existing and Proposed Elevations

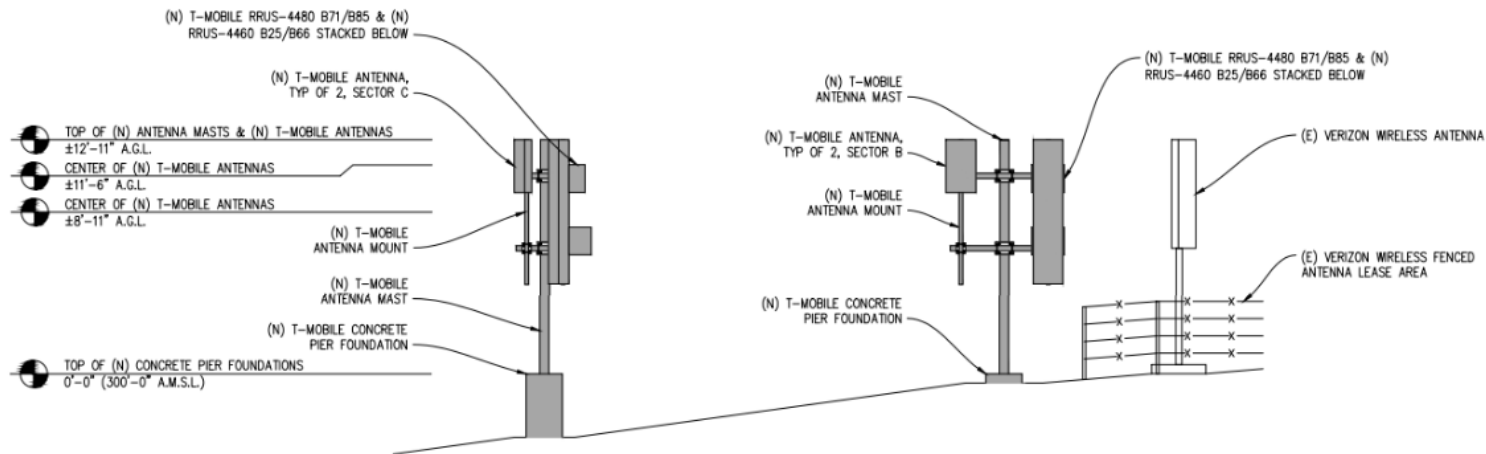
Existing



Proposed



Enlarged Elevations



(N) WEST ELEVATION
1/4"=1'-0"

RADIO FREQUENCY - ELECTROMAGNETIC ENERGY (RF-EME) COMPLIANCE REPORT

Report Type: Antenna Modification/Theoretical

FCC COMPLIANT SITE

Site ID: SFL0075A

Site Name: San Gregorio

Address: 7400 Stage Road San Gregorio, CA 94074

Date of Calculation: July 31, 2025

Date of Report: July 31, 2025

Latitude: 37.2545614 N
Longitude: -122.398056 W



Prepared By:

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1.0 Executive Summary / Report Summary

Purpose of Report

Global Technology Associates (GTA) has been contracted by T-Mobile to conduct radio frequency electromagnetic (RF-EME) modeling for T-Mobile site **SFL0075A** located at **7400 Stage Road San Gregorio, CA 94074** to determine RF-EME exposure levels from existing and proposed T-Mobile wireless communications equipment at this site.

This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields. This report contains a detailed summary of the RF-EME analysis for the site. As described in greater detail in Section named **“Federal Communications Commission (FCC) Requirements”** of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general population exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

T-Mobile Site Summary			
Site ID	SFL0075A	Street Address	7400 Stage Road
Site Name	San Gregorio	City, State, Zip	San Gregorio, CA 94074
Site Type	unipole	Latitude	37.2545614 N
Classification	occupational	Longitude	-122.398056 W
Access Restrictions	controlled	Access Type	locked chain link fence gate at BTS
Site Description	all the antennas are mounted on the unipole		
Max Predictive RF-EME at T-Mobile Facility (Occupational)	522.6% of FCC's occupational limit at ground level		
	528.0% of FCC's occupational limit (cumulative) at ground level		
Max Predictive RF-EME at Ground Level (General Population)	2610.8% of FCC's general population limit		
	2637.8% of FCC's general population limit (cumulative)		
Predictive RF-EME Analysis at T-Mobile Facility	The Proposed Antenna Configuration is In Compliance With FCC Rules & Regulations Upon Completion of the Recommendations.		

Table 1

A result of over 100% does not make a site out of compliance with FCC guidelines. For predicted EME over 100% of the applicable FCC limit, A mitigation plan (e.g. installation of signages and/or barriers/stripping to prevent the access) is required to consider the site compliant. Areas exceeding the FCC limit are presented with the barriers and appropriate signages. Accessible areas outside the demarcated are the safety zones that have predicted EME values below the FCC's limits. Installation of the recommended mitigation measures ensures that the site remains fully compliant. The predictions models antennas as if they are operating at full power, and this assumption yields a worst case scenario with more conservative results. On-site measurements may yield different results, as antennas do not always operate at full capacity.

Methodology

The site to be determined as the compliance is based on theoretical modeling using RoofView® modeling tool, appropriate RF signage placement recommendations, proposed antenna inventory as provided by T-Mobile in the construction drawings and the type & level of restricted access to the antennas at the site.

Compliance Statement

T-Mobile's operation at **7400 Stage Road San Gregorio, CA 94074** will comply with FCC rules and regulations upon completion of recommendations that includes the installation of appropriate RF Safety Signages and/or Barriers as described in Section 8.

Actions for Site Compliance

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance. If required, RF alert signage recommendations have been proposed based on theoretical analysis of MPE levels. Where applicable, barriers can consist of locked doors, fencing, railing, rope, chain, paint striping or tape, combined with RF alert signage.

T-Mobile will be compliant when the following changes are implemented:

T-Mobile proposed Alpha Sector Location

1 Caution sign on the sector as depicted in the site map in the later sections of the report.

Install Fence that is 66 ft. long along with 12 Caution signs at the General Population boundary as depicted in the site map in the later sections of the report.

T-Mobile proposed Beta Sector Location

1 Caution sign on the sector as depicted in the site map in the later sections of the report.

Install Fence that is 68 ft. long along with 12 Caution signs at the General Population boundary as depicted in the site map in the later sections of the report.

T-Mobile proposed Gamma Sector Location

1 Caution sign on the sector as depicted in the site map in the later sections of the report.

Install Fence that is 66 ft. long along with 12 Caution signs at the General Population boundary as depicted in the site map in the later sections of the report.

T-Mobile proposed Equipment/BTS Location

Ensure that 1 Guideline, 1 Information & 1 Notice signs are installed at the Equipment/BTS location, as depicted in the site map in the later sections of the report.

2.0 MPE Calculations

For this MPE predictive analysis, GTA considered the area around the accessible areas of the T-Mobile antennas on the site to determine EME field strength levels with respect to the FCC's human exposure limits. Further GTA has identified any areas with higher levels exceeding FCC MPE limits and then determined spatially averaged field levels in areas with highest fields.

GTA has utilized computer generated modeling software RoofView® 4.15 to generate the compliance report.

Modeling & Input Assumptions

In this Site Compliance Report, it is assumed that

- All antennas are operating at full power at all times.
- The Antenna Inventory Table (Section 3) shows all transmitting antennas at the site.
- A 75% duty cycle and maximum radiated power for each antenna is assumed unless T-Mobile has specified otherwise.
- Obstructions like (screens, trees, buildings etc.) that would normally attenuate the signal are not taken into account.
- GTA obtained information used in this Compliance Report from T-Mobile which is considered reliable and believes them to be true and correct.
- Due to the complexity of some wireless sites, GTA performed this analysis and created this report utilizing best industry practices and due diligence. The scales and the determinations are based on the A&E drawings provided by T-Mobile.
- Any active/live/radiating antenna configuration for the site and the premises is fully compliant per the FCC's regulations.

3.0 Antenna Inventory

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
TMO S1A1	N600	Amphenol	APXVAALL24M-U-J20	70	5.08
TMO S1A1	L700	Amphenol	APXVAALL24M-U-J20	70	5.08
TMO S1A1	L1900	Amphenol	APXVAALL24M-U-J20	70	5.08
TMO S1A1	N1900	Amphenol	APXVAALL24M-U-J20	70	5.08
TMO S1A1	L2100	Amphenol	APXVAALL24M-U-J20	70	5.08
TMO S1A4	N2500	ERICSSON	AIR6419 B41	70	9.99
TMO S2A2	N600	Amphenol	APXVAALL24M-U-J20	270	5.08
TMO S2A2	L700	Amphenol	APXVAALL24M-U-J20	270	5.08
TMO S2A2	L1900	Amphenol	APXVAALL24M-U-J20	270	5.08
TMO S2A2	N1900	Amphenol	APXVAALL24M-U-J20	270	5.08
TMO S2A2	L2100	Amphenol	APXVAALL24M-U-J20	270	5.08
TMO S2A5	N2500	ERICSSON	AIR6419 B41	270	9.99
TMO S3A3	N600	Amphenol	APXVAALL24M-U-J20	340	5.08
TMO S3A3	L700	Amphenol	APXVAALL24M-U-J20	340	5.08
TMO S3A3	L1900	Amphenol	APXVAALL24M-U-J20	340	5.08
TMO S3A3	N1900	Amphenol	APXVAALL24M-U-J20	340	5.08
TMO S3A3	L2100	Amphenol	APXVAALL24M-U-J20	340	5.08
TMO S3A6	N2500	ERICSSON	AIR6419 B41	340	9.99

Table 2

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
AT&T S1A7	LTE	Powerwave	7750	320	6.71
AT&T S1A8	LTE	Powerwave	7750	320	6.71
AT&T S1A9	LTE	Powerwave	7750	320	6.71
AT&T S2A10	LTE	Powerwave	7750	45	6.71
AT&T S2A11	LTE	Powerwave	7750	45	6.71
AT&T S2A12	LTE	Powerwave	7750	45	6.71
AT&T S3A13	LTE	Powerwave	7750	210	6.71
AT&T S3A14	LTE	Powerwave	7750	210	6.71
AT&T S3A15	LTE	Powerwave	7750	210	6.71

Table 3

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
VZW S1A16	CDMA & LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A16	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A16	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A16	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A16	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A17	CDMA & LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A17	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A17	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A17	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S1A17	LTE1	CommScope	SBNHH-1D65B	60	5.96
VZW S2A18	CDMA & LTE1	CommScope	SBNHH-1D65B	265	5.96
VZW S2A18	LTE1	CommScope	SBNHH-1D65B	265	5.96
VZW S2A18	LTE1	CommScope	SBNHH-1D65B	265	5.96
VZW S2A18	LTE1	CommScope	SBNHH-1D65B	265	5.96
VZW S2A18	LTE1	CommScope	SBNHH-1D65B	265	5.96

Table 4

4.0 Federal Communications Commission (FCC) Requirements

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radio frequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general population.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

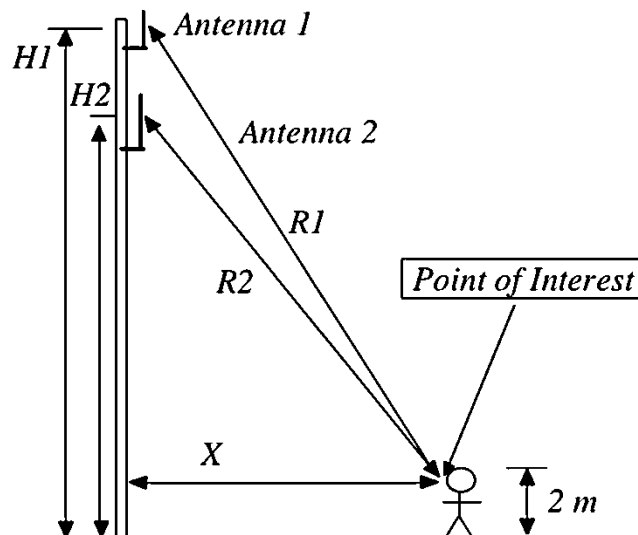


Figure 1

Table 5 and Figure 2 (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm²). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm²) and an uncontrolled MPE of 1 mW/cm² for equipment operating in the 1900 MHz frequency range. For the T-Mobile equipment operating at 800 MHz, the FCC's occupational MPE is 2.66 mW/cm² and an uncontrolled MPE of 0.53 mW/cm². These limits are considered protective of these populations.

(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-3.0	6 4	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ²)*	6
30-300	61.4	0.163	1	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Population/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-1.34	6 4	1.63	(100)*	30
1.34-30	1842/f	2.19/f	(180/f ²)*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

Table 5

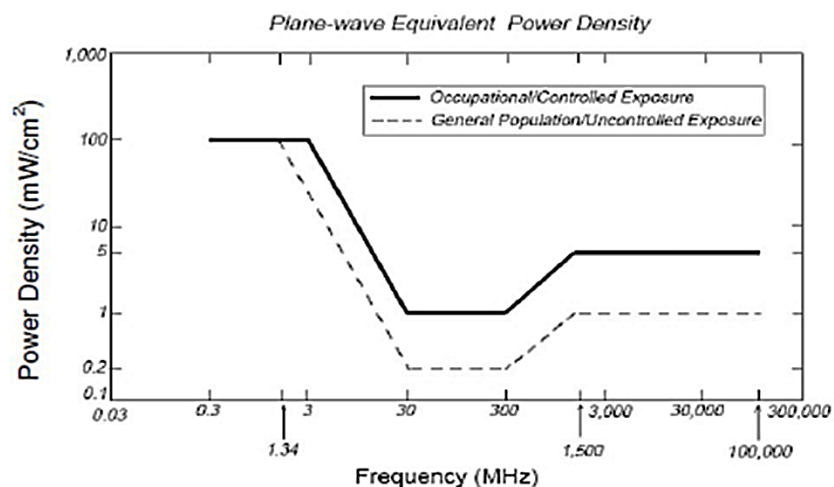


Figure 2

Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Cellular Telephone	870 MHz	2.90 mW/cm ²	0.58 mW/cm ²
Specialized Mobile Radio	855 MHz	2.85 mW/cm ²	0.57 mW/cm ²
Most Restrictive Freq. Range	30-300 MHz	1.00 mW/cm ²	0.20 mW/cm ²

Table 6

Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Facilities typically consist of:

- 1) Electronic transceivers (the radios or cabinets) connected to wired telephone lines; and
- 2) Antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 100% of the applicable MPE must participate in mitigating these RF hazards.

5.0 Limitations

This report was prepared for the use of T-Mobile. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by GTA are based solely on the information provided by T-Mobile. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to GTA so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

6.0 Safety Recommendations

Occupational Safety and Health Administration (OSHA) Requirements

OSHA requires that those in the Occupational classification must complete training in RF Safety, RF Awareness, and Utilization of Personal Protective Equipment. OSHA also provides options for Hazard Prevention and Control:

Hazard Prevention	Control
- Utilization of good equipment - Enact control of hazard areas - Limit exposures - Employ medical surveillance and accident response	- Employ Lockout/Tag out - Utilize personal alarms & protective clothing - Prevent access to hazardous locations - Develop or operate an administrative control program

Table 7

RF Signage and Barriers

All RF signs should be obeyed by at all times.



Figure 3

If there are workers in an area with a sign that they do not understand, they can call the NOC Number at 877-611-5868 for guidance.

7.0 Federal Communications Commission (FCC) Limits

Contribution to Co-Located areas

Any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible to take corrective actions like installation of mitigation measures that ensures the site remains fully compliant. All co-located sites should have a separate 5% modeling that shows only T-Mobile antennas transmitting. This separate modeling indicates T-Mobile's contribution in all areas that is recognized to be greater 100% MPE limits.

Occupational Limits

Apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

General Population limits

Apply in situations in which the general population may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. (Those without significant and documented RF Safety & Awareness training)

Controlled Environment

Applies to environments that are restricted or "controlled" in order to prevent access from members of the General Population classification.

Uncontrolled Environment

Applies to environments that are unrestricted or "uncontrolled" that allow access from members of the General Population classification.

Generic Values

The use of "Unknown" for an operator means the information with regard to the carrier, their FCC license and / or antenna information was not available. Generic values used as estimation for Effective Radiated Power (ERP) and antenna characteristics for unknown antennas.

8.0 Compliance Measures

The site needs the following mitigation and/or compliance plan.

The compliance determination is based on theoretical modeling, RF signage placement recommendations, proposed antenna inventory and the level of restricted access to the antennas at the site. At the time of our analysis, T-Mobile will be compliant with the FCC rules and regulations, as described in OET Bulletin 65 Installation of the recommended mitigation measures shown below, ensures that the site remains fully compliant.

On unipole :

Recommendations for Site Compliance	Signages on Access Points, Sectors & Equipment										Enclosing Sectors										
																					
	Guidelines		NOC INFO		NOTICE		CAUTION		WARNING		NOTICE		CAUTION		WARNING		OC Length	GP Length	Fence		
	Access Point(s)																		Fence		
	Sector Alpha						✓	1					✓	12				66 ft.	Fence		
	Sector Beta						✓	1					✓	12				68 ft.	Fence		
	Sector Gamma						✓	1					✓	12				66 ft.	Fence		
	Equipment/BTS		✓	1	✓	1	✓	1												Fence	
	Total Signage		1		1		1		3		0		0		36		0		0 sq. ft.	200 sq. ft.	Total = 200 sq.ft.

Table 8

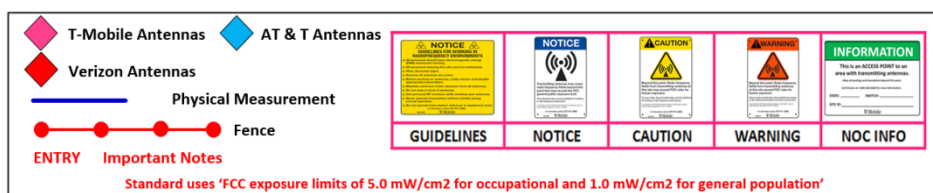
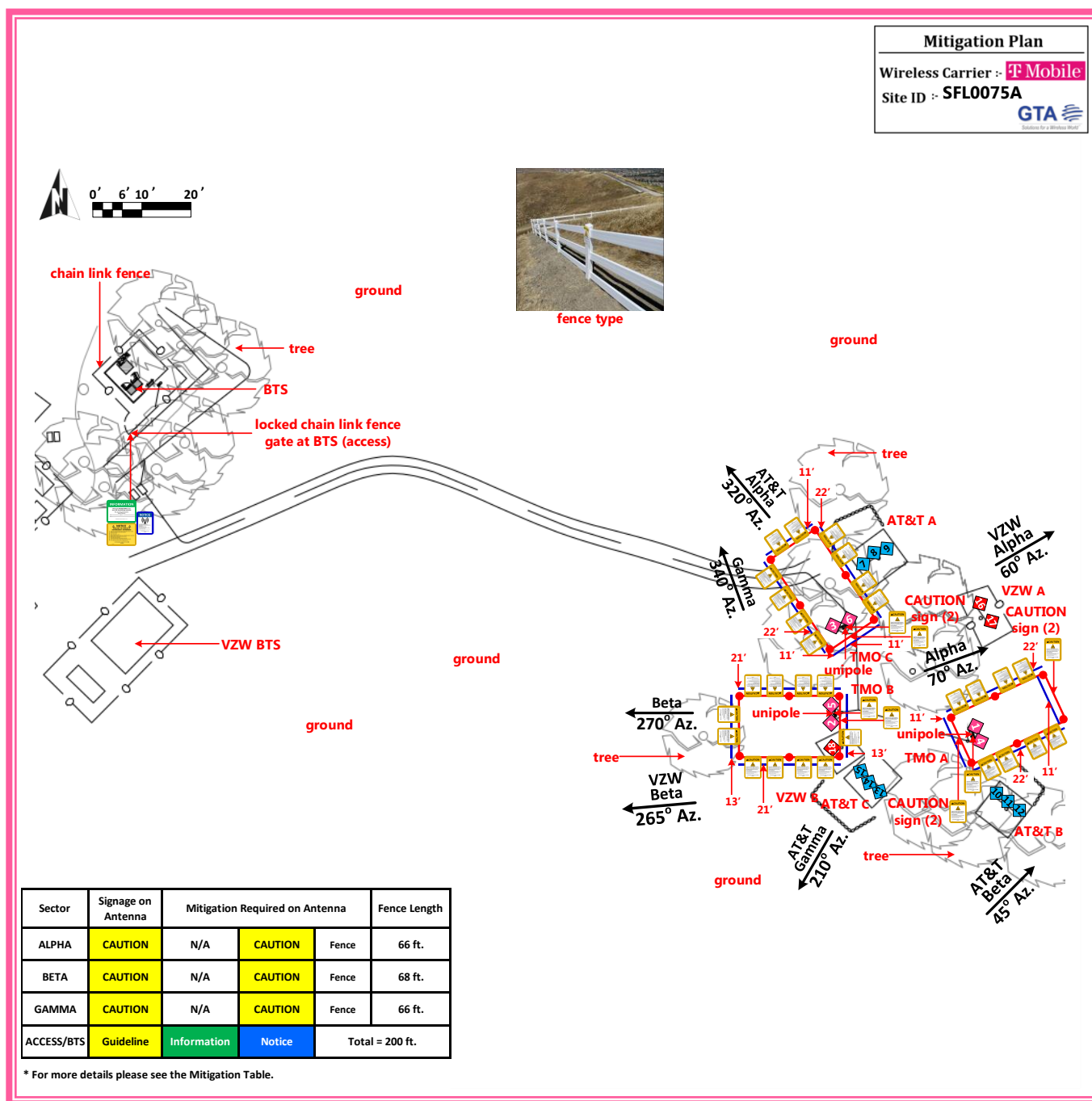
CAUTION: - The table above represents EVERY compliance item that MUST be implemented by the carrier at the site location; please see the Site Plan shown in diagram 1.

It is recommended to have periodic inspections of the components that are involved in radiation of RF energy. Periodic Electromagnetic Emission (EME) measurement should be conducted to reevaluate the RF radiation level at this site.

GTA recommends that T-Mobile and the authorized personal at the site take additional measures to ensure that persons accessing the roof/structure (for example, roofers or other maintenance workers) are informed of areas where RF levels exceed the FCC general population limit and made aware that these areas must be avoided to maintain compliance with FCC requirements. This is important especially when the placement of barriers, striping, taping or any other positive access control (areas of the roof that exceed the RF levels of general population limit) is not possible due to the physical construction or constraints or safety measures surrounding the antennas or on the roof/structure like sloped roof, tiled roof, chimney, steeples, cupolas, hilly terrain, etc.

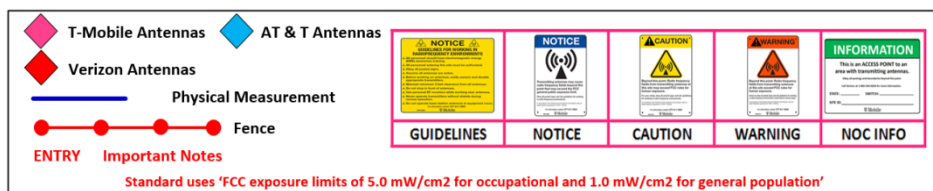
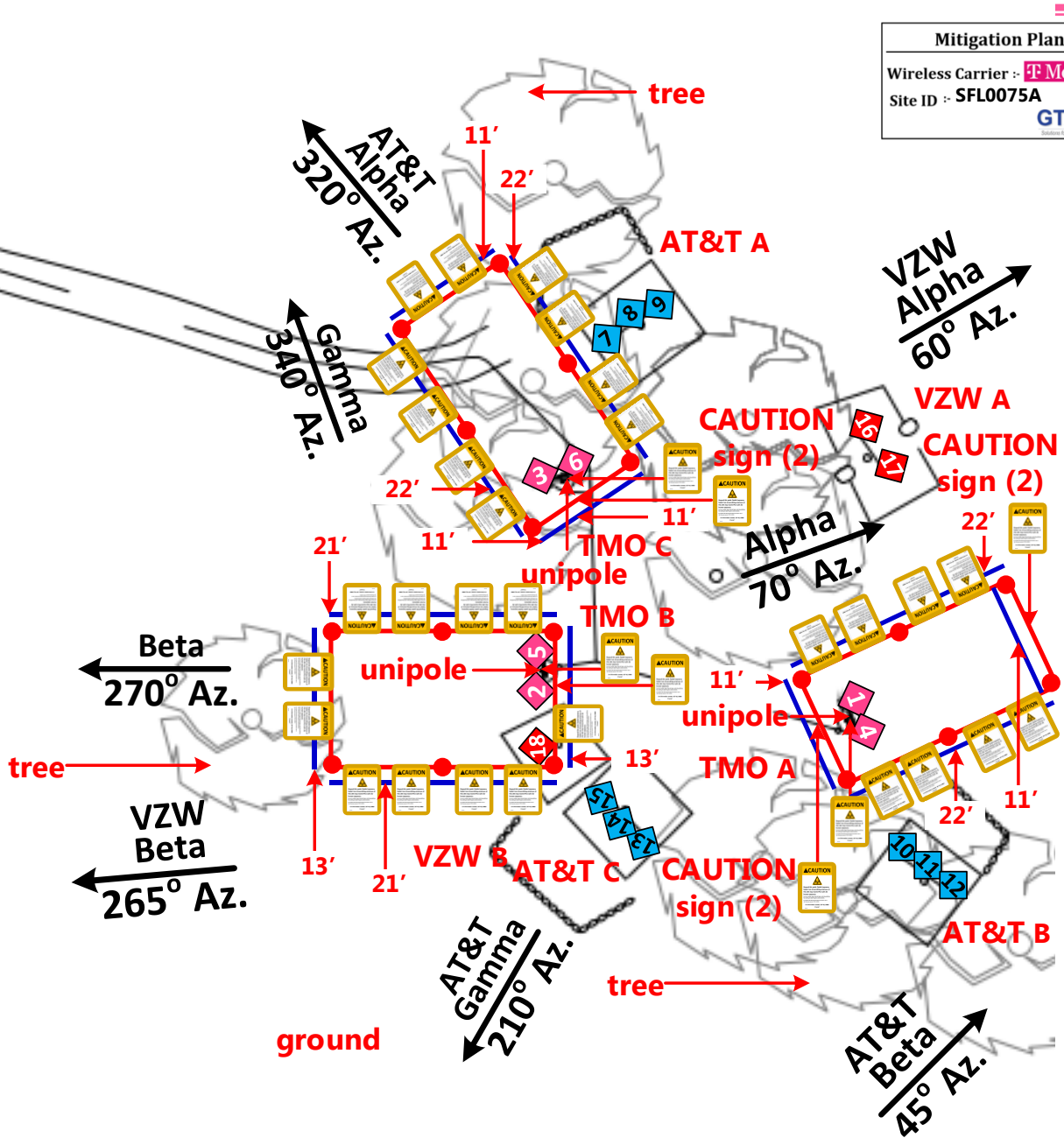
It is further recommended to distribute this report to anyone accessing the roof/structure and ensuring the confirmation that it has been read and understood.

Diagram 1: Site Scale Plan



fence type

ground



9.0 Summary And Conclusions

GTA has prepared this Radiofrequency Emissions Compliance Report for the proposed T-Mobile telecommunications equipment at the site located at **7400 Stage Road San Gregorio, CA 94074**.

GTA has conducted theoretical modeling to estimate the worst-case power density from T-Mobile antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements.

As presented in the preceding sections, based on worst-case predictive modeling, **there are modeled exposures on any accessible ground-level walking/working surface** related to proposed equipment in the area that exceed the FCC's **occupational** exposure limits at this site. Any of the modeled exposure areas exceeding the **occupational** limits need to follow the mitigation/compliance plan proposed in the report in order to ensure that the site remains fully compliant. As such, the proposed T-Mobile project is in compliance with FCC rules and regulations. **Posting of the signages and the recommendations** presented in Section 8 **ensures that the site remains fully compliant with FCC rules and regulations**.

At ground-level the anticipated maximum predictive RF-EME at T-Mobile facility will be 522.6% of FCC's occupational limit. This was determined through calculations along a radial from each sector taking full power values into account as well as actual vertical plane antenna gain values per the manufacturer-supplied specifications for gain. Based on worst-case predictive modeling, there are areas at ground level related to the proposed antennas that exceed the FCC's occupational or general population exposure limits at this site. **At ground level, the maximum power density generated by the antennas is approximately 2610.8% of FCC's general population limit (522.6% of the FCC's occupational limit).**

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

Modeling indicates that there will be no accessible areas on the walking/working surfaces at the ground-level in front of the T-Mobile antennas that may exceed the FCC standards for general population and/or occupational exposure after implementation of mitigation measures. To reduce the risk of exposure and/or injury, GTA recommends that access to the **unipole** or areas associated with the active antenna installation or mitigation measures are restricted and secured where possible.

In order to alert any workers or general population potentially accessing the site, a blue Notice sign and/or yellow Caution sign and/or orange Warning sign based on the simulated exposure limits along with a yellow Guidelines sign are recommended for installation at the access to the rooftop/structure along with the barriers/stripping to exclude the RF radiations exceeding areas per the applicable limits.

10.0 Certification

This report has been prepared under the direction of the following Registered Professional Engineer:

I **Michael A. McGuire PE**, on the date indicated near my seal below hereby certify that:

I am registered as a Professional Engineer with License number listed below and that I am thoroughly familiar with the Regulations of the Federal Communication Commission (FCC), both in general and specifically as they apply to FCC guidelines for human exposure to Radiofrequency electromagnetic radiation and the EME predictive analysis for site identified as **SFL0075A** located at **7400 Stage Road San Gregorio, CA 94074**, has performed on **July 31, 2025** in order to determine where there might be electromagnetic energy that is in excess of both the Controlled Environment and Uncontrolled Environment levels; and that I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge.



sealed 31jul2025