## COUNTY OF SAN MATEO PLANNING AND BUILDING DEPARTMENT

**DATE:** April 22, 2015

**TO:** Planning Commission

**FROM:** Planning Staff

**SUBJECT:** EXECUTIVE SUMMARY: Consideration of an Initial Study/Mitigated

Negative Declaration, a Use Permit, and a Significant Tree Permit, to construct a new wireless telecommunication facility for Verizon Wireless, including a 28-foot high broad leaf monopole and approximately 255 sq. ft. in total equipment lease area, where two wireless telecommunication facilities owned by other carriers exist at the site. The project includes the removal of two significant trees and 18 small, non-significant trees, as well as minor grading, located at 1175 Palomar Drive in the unincorporated

Palomar Park area of San Mateo County.

County File Number: PLN 2005-00306 (Verizon Wireless)

## **PROPOSAL**

James Cosgrove of NSA Wireless, Inc., an authorized representative of Verizon Wireless, proposes to construct a new wireless telecommunication facility for Verizon Wireless, including a 28-foot high broad leaf monopole and approximately 255 sq. ft. in total equipment lease area. The project, which previously included three antenna poles (each 20 feet in height), has been revised to reduce the number of poles to one, and to incorporate the antennas into broad-leaf tree form(s) to comply with Mitigation Measure 11 of the Initial Study/Mitigated Negative Declaration. Two existing wireless telecommunication facilities, individually owned by Sprint and T-Mobile, exist at the site. The applicant proposes to remove two significant pine trees in fair condition (Trees #15 and #16) and, based on the recommendation of a certified arborist, 18 small, non-significant size trees which are in poor condition.

## **RECOMMENDATION**

Certify the Initial Study/Mitigated Negative Declaration and approve the Use Permit and a Significant Tree Permit, County File Number PLN 2005-00306, by making the required findings and adopting the conditions of approval listed in Attachment A of the staff report.

#### **DISCUSSION**

Due to its ridgeline location, the project would be visible from a portion of Edgewood Road that is a County-designated "scenic route". Policy 4.27 (*Ridgelines and Skylines*) of the General Plan discourages structures on open ridgelines and skylines, when seen as part of a public view and requires structures to: (1) blend with the existing silhouette; (2) not break or cause gaps within the ridgeline silhouette by removing tree masses; and (3) relate to the ridgeline form. The project, as previously proposed, did not blend into the ridgeline and forest silhouette or environment. As discussed in the Initial Study/ Mitigated Negative Declaration (IS/MND), the two existing facilities owned by Sprint and T-Mobile, the proposed facility, and a facility proposed by AT&T under a pending application, would be visible from Edgewood Road and, cumulatively would result in construction that would significantly conflict with this policy. In compliance with Mitigation Measure 11 (Condition No. 25 in Attachment A of the staff report), the applicant has revised the project to reduce the number of new antenna poles at the site to one and to camouflage the antenna pole in a tree-like form that conforms to existing vegetation in the area.

The facility complies with applicable standards of the County's Wireless Telecommunication Facilities (WTF) Regulations. Specifically, Section 6512.2.E provides standards for limiting adverse visual impacts, including, but not limited to, siting facilities out of the public viewshed, use of existing and new vegetation, and designing wireless telecommunication facilities to blend in with the surrounding environment. The section states that "attempts to replicate trees or other natural objects shall be used as a last resort." The use of a tree-like form to camouflage the antenna pole is appropriate as a last resort, due to site's visibility from a scenic route, height of the proposed cell towers, and the limitations of screening the facilities using newly planted vegetation.

The project complies with the required findings for the issuance of a Use Permit, per Section 6503 of the Zoning Regulations. The establishment, maintenance and/or conducting of the use would not, under the circumstances of this particular case, be detrimental to the public welfare or injurious to property or improvements in the neighborhood, as the project would, together with the existing and proposed facilities at the site, comply with Federal Communications Commission (FCC) guidelines limiting public exposure to radio frequency (RF) energy and would not be accessible to the general public. Also, the proposed telecommunications facility is necessary for the public health, safety, convenience or welfare of the community, as the project would benefit the community by providing improved coverage by bridging existing services areas currently separated by a service gap, and would support the County's E-911 system.

In Design Review (DR) Districts, the County's Significant Tree Regulations define significant trees as any tree that is 6" or more in diameter. The applicant proposes to remove two significant Monterey pine trees (Trees #15 and #16) which overhang the proposed equipment pad and are located within the proposed 5-foot access and utility

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<sup>&</sup>lt;sup>1</sup> Edgewood Road is a County-designated "scenic route" from Alameda de las Pulgas to Canada Road.

route. Staff finds that the tree removal proposal meets the required criteria for permit approval, specifically Chapter 28.1 (Design Review District) of the San Mateo County Zoning Regulations, which allows for the removal of trees that are too closely located to existing or proposed structures, and calls for the replacement of each lost tree with up to three (3) 5-gallon size trees. The subject trees overhang the proposed equipment pad and are located within the proposed 5-foot access and utility route. Per Mitigation Measure 4 (Condition No. 18), the two removed significant trees would be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. Previously, the applicant also proposed to remove two hazardous significant pine trees (Trees #9 and #10). These trees are located along the right shared property line, where the neighbor (who owns one tree solely and has shared ownership of the other) has not provided authorization for the removal of the trees and, therefore, the trees are not authorized for removal.

An IS/MND was issued in conformance with California Environmental Quality Act (CEQA) Guidelines and found that, when implemented, the project, as proposed and mitigated, would ensure that impacts are not significant. During the comment period, staff received several comment letters. Commenters expressed concern with the level of completeness of the pending AT&T application included in the cumulative analysis, whether trees should be replaced with fewer larger trees instead of numerous small trees to protect existing trees, and that the County should collect a \$10,000.00 surety deposit, among other concerns. Planning staff balanced Verizon's desire for timely case processing with the need to prepare a IS/MND which studies cumulative impacts of the pending AT&T project and determined that there is an adequate level of detail for such analysis.<sup>2</sup> Condition No. 18 of Attachment A of the staff report requires an arborist to determine the appropriate size of replacement trees, requires an additional \$2,000.00 surety deposit for the maintenance of existing trees in addition to the \$4,000.00 surety deposit required for the maintenance of newly planted trees, and requires the applicant to submit maintenance reports to the Current Planning Section for five (5) years.

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<sup>&</sup>lt;sup>2</sup> Staff determined that there was not adequate detail and case activity to include Metro PCS in the IS/MND, as current plans were received in 2007 (prior to adoption of the Wireless Telecommunication Facilities Ordinance), there has been little subsequent case activity, Metro PCS was acquired by T-Mobile in Spring 2013, and there is an existing T-Mobile facility already at this location. Should the application become active, project impacts, if not already evaluated in the IS/MND, it would need to be analyzed and the project reviewed for compliance with the Wireless Telecommunication Facilities Ordinance.

## COUNTY OF SAN MATEO PLANNING AND BUILDING DEPARTMENT

**DATE:** April 22, 2015

**TO:** Planning Commission

**FROM:** Planning Staff

**SUBJECT:** Consideration of an Initial Study/Mitigated Negative Declaration, pursuant

to the California Environmental Quality Act (CEQA), a Use Permit, pursuant to Section 6510 of the San Mateo County Zoning Regulations, and a Significant Tree Permit, pursuant to Section 12,020 of the San Mateo County Ordinance Code, to construct a new wireless telecommunication facility for Verizon Wireless, including a 28-foot high broad leaf monopole and approximately 255 sq. ft. in total equipment lease area, where two wireless telecommunication facilities owned by other carriers exist at the site. The project includes the removal of two significant trees and 18 small, non-significant trees, as well as minor grading, located at 1175 Palomar Drive in the unincorporated Palomar Park area of San

Mateo County.

County File Number: PLN 2005-00306 (Verizon Wireless)

#### **PROPOSAL**

James Cosgrove of NSA Wireless, Inc., an authorized representative of Verizon Wireless, proposes to construct a new wireless telecommunication facility, including a 28-foot high broad leaf monopole and approximately 255 sq. ft. in total equipment lease area, where wireless telecommunication facilities owned by Sprint and T-Mobile exist at the site. The monopole would be located adjacent to the equipment lease area located at the rear of the property. As proposed, the lease area involves a concrete pad that will be enclosed within a new 8-foot high wood fence. The project involves the removal of two significant pine trees in fair condition (Trees #15 and #16) and, based on the recommendation of a certified arborist, removal of 18 small, non-significant trees which are in poor condition, as well as minor grading. The project, which previously included three antenna poles (each 20 feet in height), has been revised to reduce the number of poles to one, and to incorporate antenna into broad-leaf tree form(s) to comply with Mitigation Measure 11 of the Initial Study/Mitigated Negative Declaration.

### **RECOMMENDATION**

Certify the Initial Study/Mitigated Negative Declaration and approve the Use Permit and a Significant Tree Permit, County File Number PLN 2005-00306, by making the required findings and adopting the conditions of approval listed in Attachment A.

#### **BACKGROUND**

Report Prepared By: Camille Leung, Project Planner, 650/363-1826

Applicant: James Cosgrove, NSA Wireless, Inc., an authorized representative of

Verizon

Owner: Ethel Brooks and Curtis Brooks

Location: 1175 Palomar Drive, unincorporated Palomar Park area of San Mateo County

APN: 051-416-040 (25,155 sq. ft.)

Sphere-of-Influence: City of San Carlos

Existing Zoning: R-1/S-101/DR (Single-family Residence/20,000 sq. ft. minimum lot

size/Design Review)

General Plan Designation: Low Density Residential (0.3-2.3 dwelling units per acre)

Existing Land Use: Single-family residential use, with Sprint and T-Mobile facilities

located at the rear of the parcel.

Flood Zone: Flood Zone X (Area of minimal flood hazard), FEMA Panel No. 06081C0282E, effective October 16, 2012.

Environmental Evaluation: Initial Study and Mitigated Negative Declaration (IS/MND) issued with a public review period of January 21, 2014 to February 10, 2014. A discussion is included in Section B of this report, below.

Setting: The parcel has a slope of approximately 10% and is located on a ridgeline. The parcel is improved with a single-family residence and existing Sprint and T-Mobile wireless telecommunications facilities, which are located in the rear yard along the ridgeline. The northwest portion of the rear yard contains the a portion of the Sprint facility (a 13-foot, 6-inch high antenna pole within a 16 sq. ft. lease area and a 270 sq. ft. equipment enclosure) and a T-Mobile facility (a 15-foot high antenna pole located within a 211 sq. ft. equipment enclosure area). The southwest portion of the rear yard contains a second Sprint antenna pole (13 feet, 6 inches in height) within a 16 sq. ft. lease area. The rear yard contains several trees, shrubs and various landscaping.

Chronology:

<u>Date</u> <u>Action</u>

July 29, 2005 - Application is received by Current Planning staff.

December 7, 2006

Zoning Hearing Officer public hearing. Item was continued based on the Zoning Hearing Officer's request for information regarding radio frequency (RF) exposure, among other information.

December 9, 2008

Board of Supervisors adopts the Wireless Telecommunication Facilities Ordinance (Effective date: January 9, 2009).

December 2009

 Application placed on hold due to a lawsuit involving the existing Sprint facility (PLN 2000-00497) at the project site.

2010 - 2012

 Applicant revises proposal to comply with the requirements of the Wireless Telecommunication Facilities Regulations.

April 12, 2012

In a letter dated April 12, 2012, the County determines that the pending application does not meet the criteria for a CEQA exemption and requires the preparation of an Initial Study, per CEQA Section 15063, to study the potential for significant cumulative impact(s) of existing and proposed projects (Attachment F). Potential significant cumulative impact(s) may include, but are not limited to, radio frequency emissions and visual impacts. The letter states that after the completion of an Initial Study, the County will require the preparation of a Negative Declaration or an Environmental Impact Report (EIR).

February 27, 2013

 Project Planner meets with Alicia Torre (Property owner of 1354 Pebble Drive, San Carlos) and Sally Einspahr (Property owner of 1165 Palomar Drive) to review their concerns, including potential project-related view impacts from their properties.

November 1, 2013

Application is deemed complete.

January 21, 2014

 IS/MND are made publicly available and the 20-day public review period commences. The IS/MND analyzes the potential environmental impacts of the construction of the subject project, as well as a proposed AT&T wireless telecommunication facility (PLN 2010-00274).

Comments from interested members of the public are received by staff, as discussed in Section B of this report. Specifically, Alicia Torre and Johnathan Nimer at 1354 Pebble Drive, state that the trees are located on their property and they do not authorize the removal of the trees.

February 10, 2014

IS/MND public review period ends. Comment letter received from the public.

October 2014

 Verizon changes the project applicant from Charnel James to James Cosgrove, both of NSA Wireless.

February 9, 2015

 Applicant submits revised plans. Mr. Cosgrove submits a modified project design to comply with Mitigation Measure 11 requiring camouflaging of the proposed antenna poles within tree-like forms.

February 25, 2015

 Planning staff refers the revised plans to Cal-Fire, the County's Environmental Health Division, and the Palomar Property Owner's Association for their review. Cal-Fire and the Environmental Health Division provide preliminary review and approval.

April 22, 2015

Planning Commission meeting.

#### **DISCUSSION**

#### A. KEY ISSUES

## 1. Conformance with the General Plan

The County's General Plan designates the property for Low Density Residential (0.3 - 2.3 dwelling units/net acre) land uses. The project, as proposed and conditioned, conforms to all applicable General Plan policies, with specific discussion of the following policies:

## Chapter 4 - Visual Quality

Policy 4.20 (*Utility Structures*) requires minimizing adverse visual impacts generated by utility structures. As discussed in the Initial Study/Mitigated Negative Declaration (IS/MND) in Attachment F, the project, which formerly included three additional antenna poles (each 20 feet in height), would be visible from residential areas, public lands, and roads, and may result in a significant adverse effect on views from those viewing locations. The project site is located on a ridgeline in a forested area containing 23 significant trees (trees that are 6-inches or more in diameter) and 21 smaller trees. The proposed antenna pole which is camouflaged in a tree-like form that conforms to existing vegetation in the area would conform the project to the ridgeline environment and would reduce the project's significant adverse effect on views from residential areas, public lands, and roads. The applicant also proposes to remove 18 small trees (including 17 dead, one damaged), based on the recommendation of the arborist report (included as Attachment E of Attachment F). The applicant also proposes to remove two significant pine trees in fair condition and protect

the remaining trees.<sup>1</sup> Proposed tree removals would increase the visibility of the project from residential areas, public lands, and roads. Condition Nos. 15 through 25 (Mitigation Measures 2 through 5) in Attachment A require the replacement of trees removed and the implementation of protection and maintenance measures for new and retained trees. As proposed and conditioned, the project would minimize adverse visual impacts generated by the proposed utility structures.

Policy 4.21 (*Scenic Corridors*) calls for the County to protect and enhance the visual quality of scenic corridors by managing the location and appearance of structural development. As shown in project visual simulations (Attachment H), due to its ridgeline location, the project would be visible from a portion of Edgewood Road that is a County-designated "scenic route". The project, which previously included three antenna poles (each 20 feet in height), has been revised to reduce the number of poles to one 28-foot high pole and to comply with Mitigation Measure 11 of the IS/MND requiring poles to be camouflaged within broad-leaf tree form(s).

Policy 4.27 (*Ridgelines and Skylines*) defines public view as a range of vision from a public road or other public facility. The policy discourages structures on open ridgelines and skylines, when seen as part of a public view, in order to preserve visual integrity. Structures on open ridgelines and skylines are only allowed as part of a public view when no alternative building site exists. The policy requires structures on ridgelines in forested areas, which are part of a public view to: (1) blend with the existing silhouette; (2) not break or cause gaps within the ridgeline silhouette by removing tree masses; and (3) relate to the ridgeline form. The applicant has provided a feasibility analysis of alternate project sites included in Attachment I, which were determined to be infeasible. The project, as previously proposed, did not blend into the ridgeline and forest silhouette or environment. As discussed in Section 10.b of the IS/MND, the two existing facilities owned by Sprint and T-Mobile, the proposed facility, and facilities proposed by AT&T under a pending application, would be visible from Edgewood Road and cumulatively would result in construction that would significantly conflict with this policy. In compliance with Mitigation Measure 11 (Condition No. 25 in Attachment A), the applicant has revised the project to reduce the number of new antenna poles at the site to one and to camouflage the antenna pole in a tree-like form that conforms to existing vegetation in the area.<sup>3</sup> The IS/MND determined that the construction of up to three new poles that are camouflaged in tree-like forms would blend with

<sup>&</sup>lt;sup>1</sup> Previously, the applicant also proposed to remove two hazardous significant pine trees (Trees #9 and #10) located along a shared property line. However, the removal of these trees were not authorized by the adjoining property owner and will be retained.

<sup>&</sup>lt;sup>2</sup>Edgewood Road is a County-designated "scenic route" from Alameda de las Pulgas to Canada Road. <sup>3</sup> The Wireless Telecommunication Facilities Regulations allow for facilities to replicate trees as a last resort. In this instance, the use of tree-like forms to camouflage antenna poles is appropriate as a last resort, due to the large number of poles (eight poles) that would exist at the property should the subject project, as proposed, and the pending AT&T project, be approved.

the existing ridgeline silhouette and forested environment and would mitigate conflict with this policy, such that impacts would be considered less than significant. Staff suggests that there be no more than three of these poles at the project site, as the construction of more than three of these tree-like structures could reduce their camouflaging effect and cause the structures to stand out from real trees at the property, increasing visual impacts to ridgeline views from Edgewood Road.<sup>4</sup>

Policy 4.47 (*Topography and Vegetation*) calls for project proponents to design structures which conform to the natural topography and blend rather than conflict with the natural vegetation. As proposed, project construction would blend with the existing ridgeline silhouette and forested environment. The applicant has selected a broad-leaf tree pole, which conforms to existing vegetation in the area. While the project involves the removal of two significant pine trees and 18 small, non-significant trees, Condition No. 18 requires the applicant to replace the significant trees with indigenous trees at a ratio of 3:1 using a minimum of 5-gallon size stock, unless directed by an arborist to plant a fewer number of larger replacement trees to minimize potential harm to existing trees with the size and number of replacement trees as recommended by the arborist. The condition also requires a surety deposit of \$4,000.00 for the planting and care of new trees, where maintenance is required for five (5) years, as well as \$2,000.00 for the care of existing trees.

Policy 4.48 (*Scale*) calls for the project proponent to design structures which are compatible in size and scale with their building site and surrounding environment, including adjacent man-made or natural features. Policy 4.52 (*Height*) calls for the County to limit the height of structures or appurtenances in forested areas, so as not to exceed the height of the forest canopy. The height of the broad-leaf tree poles would be 28 feet in height and in character with existing trees at the site.

Policy 4.53 (*Accessory Structures*) calls for project proponents to design accessory structures to be, where feasible, located in the immediate vicinity of main structures. The siting of antenna poles is largely based on service considerations. As shown in Attachment C, the proposed equipment area is clustered with existing equipment areas owned by Sprint and T-Mobile.

## 2. Conformance with Zoning Regulations

The project site is located within the R-1/S-101/DR (Single-family Residence/20,000 sq. ft. minimum lot size/Design Review) Zoning District. While the proposed facility is primarily regulated by the County's Wireless Telecommunication Facilities (WTF) Regulations, Section 6512.2(H) of the

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<sup>&</sup>lt;sup>4</sup> AT&T (PLN 2010-00274), in a separate application which is still incomplete, has also revised its proposal from two antenna poles (each 15 feet in height) to include one broad leaf monopole.

WTF Regulations requires facilities to comply with all requirements of the underlying zoning district.

## a. One Family Residential District (R-1) Zoning District

Chapter 24.5 of the Zoning Regulations (Wireless Telecommunication Facilities) establishes such facilities as a permitted use in residential districts, subject to the issuance of a use permit and project compliance with standards as listed in the regulation.

#### b. S-101 Combining District (Palomar Park)

The project complies with standards of the S-101 Combining District as shown in the table below:

Table 1				
Project Compliance with S-101 Combining District Standards				
S-101 Combining District Standards	Project	Project Complies?		
28 feet	28 feet	Yes		
10 feet	42 feet	Yes		
10 feet	45 feet	Yes		
20 feet	20 feet	Yes		
25% (6,288.75 sq. ft.)	3,205 sq. ft.	Yes		
	<u>+</u> 2930 sq. ft.			
	<u>+</u> 275 sq. ft.			
	<u>+</u> 30 sq. ft.			
	<u>+</u> 45 sq. ft.			
	<u>+</u> 200 sq. ft.			
N/A	N/A	N/A		
	S-101 Combining District Standards  28 feet  10 feet  20 feet  25% (6,288.75 sq. ft.)	with S-101 Combining District Standards           S-101 Combining District Standards         Project Project           28 feet         28 feet           10 feet         42 feet           10 feet         45 feet           20 feet         20 feet           25% (6,288.75 sq. ft.)         3,205 sq. ft. $\pm 2930$ sq. ft. $\pm 275$ sq. ft. $\pm 30$ sq. ft. $\pm 45$ sq. ft. $\pm 45$ sq. ft. $\pm 200$ sq. ft.		

Notes: 1) Only structures over 18" in height or more above the ground are included in lot coverage calculations. 2) Maximum Floor Area includes enclosed areas and areas covered by a waterproof roof which extends four (4) or more feet from exterior walls. No such areas are included in the proposal.

As shown in Table 1, the project complies with all applicable standards of the S-101 Combining District.

## c. Design Review (DR) Zoning District

The project is subject to Section 6565.16 (*Standards for Design in Palomar Park*). While many of the standards apply to residential buildings, standards requiring minimization of tree removal and minimize alteration of the natural topography are applicable to this

project. Tree removals associated with the project are presented in Table 2 below:

Table 2 Trees to be Removed and Replaced at 1175 Palomar Drive (Revised from the table provided in the IS/MND)				
Carrier	Significant Trees (6" dbh or larger)	Non-Significant Trees (less than 6" dbh)	Required Number of Replacement Trees (3:1 for significant and 1:1 for non-significant trees)	
Verizon	2*	18	24	

<sup>\*</sup> Note: While four (4) significant trees are proposed for removal, the applicant must retain two (2) Monterey pine trees located on a shared property line. Tree removals associated with the pending AT&T proposal (PLN 2010-00274) are unknown at this time.

Sources: Design Review District Regulations; Arborist Report for Verizon; AT&T Proposal.

The project involves the removal of two (2) significant trees and, based on the recommendation of an arborist, the removal of 18 small, non-significant trees. Condition No. 18 requires the applicant to replace the significant trees at with indigenous tree a ratio of 3:1 using a minimum of 5-gallon size stock, unless directed by an arborist to plant a fewer number of larger replacement trees to minimize potential harm to existing trees with the size and number of replacement trees as recommended by the arborist. The project would result in minor land disturbance and grading associated with the installation of antenna poles and the construction of equipment pads for the lease areas associated with the new facility. The antenna pole will be camouflaged in a tree-like form and equipment areas will be screened within a wood fence enclosure. Condition No. 5 requires the wooden fence to be stained a medium/dark brown or dark green to blend in with the forested environment.

#### 3. Compliance with Wireless Telecommunication Regulations

The application is subject to the requirements of the County's Wireless Telecommunication Facilities (WTF) Regulations. Per Section 6511 (*Definitions*) of the WTF Regulations, "co-location" means the placement or installation of wireless telecommunication facilities, including antennas and related equipment on, or immediately adjacent to, an existing wireless telecommunication facility. The facility is proposed at a property with two existing facilities (Sprint and T-Mobile), where facility equipment would adjoin existing equipment at the site. Therefore, the project is considered a co-location facility.

Section 6513 (*Permit Requirements and Standards for Co-Location Facilities*) of the WTF Regulations establishes that applications for co-location will be subject to the standards and procedures outlined for

new wireless telecommunication facilities (Section 6512 through 6512.6), if any of the following apply:

- a. No use permit was issued for the original wireless telecommunication facility: Both of the existing Sprint (PLN 2000-00497) and T-Mobile (PLN 2001-00801) facilities have been issued use permits.
- b. The use permit for the original wireless telecommunication facility did not allow for future co-location facilities or the extent of site improvements involved with the co-location project: The use permits approved for Sprint and T-Mobile did not allow for any future co-location facilities nor the extent of site improvements involved with this project.
- c. No Environmental Impact Report (EIR) was certified, or no Negative

  Declaration or Mitigated Negative Declaration was adopted for the
  location of the original wireless telecommunication facility that
  addressed the environmental impacts of future co-location of facilities:
  No EIR or Negative Declaration or Mitigated Negative Declaration was
  adopted for the original facilities that addressed future co-location. A
  Negative Declaration is currently proposed for adoption.

As two of the three factors apply to the project, the co-location facility is subject to the standards and procedures outlined for new wireless telecommunication facilities.

- a. Development and Design Standards for New Facilities
  - (1) Section 6512.2.A prohibits new wireless telecommunication facilities in a sensitive habitat, as defined by Policy 1.8 of the General Plan (*Definition of Sensitive Habitats*), for facilities proposed outside of the Coastal Zone.

As discussed in the IS/MND (Attachment F), Planning staff performed a search of the California Natural Diversity Database (CNDDB) for special-status plants and wildlife species in the area. No special-status plants and wildlife species exist in the project vicinity. In addition, the property has been occupied by residential uses since 1968, where the area to be disturbed is within the backyard of the subject property. The project site is not located near any water body. Therefore, the site does not contain nor is it adjacent to a sensitive habitat.

(2) Section 6512.2.B prohibits such facilities to be located in Residential (R) Zoning Districts, unless the applicant demonstrates, by a preponderance of evidence, that a review has been conducted of other options, and no other sites or combination of sites allows for 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.

The site is located in the R-1/S-101 Combining District. On February 18, 2015, the applicant provided a feasibility analysis for alternative sites listed in the Palomar Property Owners' presentation to the Board of Supervisors, dated December 1, 2010<sup>5</sup>: (1) Water Tower 1 in Pulgas Ridge Park; (2) Water Tower 2 above Cordilleras Mental Health Center; (3) Water Tower 3 at 602 Glenloch Way; and (4) San Francisco Water District Pumping Station at Edgewood Road and Crestview Drive (Attachment I). The applicant has deemed these sites to be infeasible as they do not meet project coverage goals.

In a phone conversation with Planning staff on April 15, 2015, the applicant has also explained that the location of smaller facilities on utility poles within road rights-of-ways may not necessarily result in reduced impacts to residences as utility poles may be located in front of or across the street from residential properties. Also, the construction of facilities on multiple properties to achieve equivalent coverage would require additional cost and time for the applicant and may not result in reduced impact to residences.

(3) Section 6512.2.C prohibits a new facility where co-location on an existing facility would provide equivalent coverage with less environmental impact.

As discussed above, the proposed facility adjoins two existing facilities (Sprint and T-Mobile) at the project site and is considered to be a co-location facility.

(4) Section 6512.2.D states that, except where aesthetically inappropriate, new facilities shall be constructed to accommodate co-location and must be made available for co-location unless technologically infeasible.

The project site could feasibly accommodate additional facilities which could adjoin existing and proposed facilities. As shown in plans included as Attachment C, in a pending application that is considered incomplete, AT&T proposes one additional broad leaf monopole at the property. Mitigation Measure 11 (Condition No. 25 in Attachment A) limits the number of new antenna poles to no more than a total of three poles at this site, where the proposed facility involves one new

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<sup>&</sup>lt;sup>5</sup> Presentation was made in relation to the Sprint Use Permit Renewal.

pole and new poles for pending applications would be constructed on a first-come, first-served basis.

(5) Section 6512.2.E states that adverse visual impacts should be limited through: (1) siting out of the public viewshed, (2) use of existing and new vegetation, (3) constructing towers no taller than necessary to provide adequate coverage and minimizing and mitigating visual impacts through landscaping, painting all equipment to blend with existing landscape colors, and designing wireless telecommunication facilities to blend in with the surrounding environment. Attempts to replicate trees or other natural objects shall be used as a last resort. Landscaping shall be maintained by the property or facility owner and/or operator.

In compliance with Mitigation Measure 11 (Condition No. 25 in Attachment A), the applicant has reduced the number of new antenna poles for Verizon from three to one broad leaf monopole. The antenna pole would blend with the existing ridgeline silhouette and forested environment, and minimize impacts to public views. In this instance, the use of a tree-like form to camouflage the antenna pole is appropriate as a last resort, due to the site's visibility from a scenic route, height of the proposed cell towers, and the limitations of screening the facilities using newly planted vegetation.. Condition No. 18 requires the applicant to maintain existing landscaping and replace removed trees, requiring a total surety deposit of \$6,000.00 to ensure compliance with these requirements.

(6) Section 6512.2.F requires paint color to be used to minimize visual impact of the facility and to blend with the surrounding environment.

As mitigated, the project would involve the construction of one new pole that is camouflaged in a green tree-like form and would blend with the existing ridgeline silhouette and forested environment. Condition No. 10 requires the applicant to maintain the color and design of the tree-like form for the life of the project.

(7) Section 6512.2.G requires facilities to be constructed of non-reflective materials.

As discussed in the IS/MND, while no new light sources are proposed, antennas and associated equipment would be made of metal and could potentially provide new sources of glare if materials are reflective. Mitigation Measure 1 (Condition No. 15)

requires reflective surfaces to be screened or painted such that surfaces would not be reflective.

(8) Section 6512.2.H requires the facility to comply with all the requirements of the underlying zoning district(s), including, but not limited to, setbacks.

As discussed in Section A.2, above, the project would comply with the requirements of the underlying zoning district.

(9) Section 6512.2.I prohibits in any Residential (R) District monopoles or antennas that exceed the maximum height for structures allowed in that district.

The project complies with the maximum height limit of the R-1/S-101 Zoning Regulations, which sets a height limit of 28 feet where the antenna pole would be 28 feet in height.

(10) Section 6512.2.J permits in any Residential (R) District, accessory buildings in support of such facilities to be constructed, provided that they comply with the County's Detached Accessory Building Regulations, except that building coverage and floor area maximums shall apply to buildings in aggregate, rather than individually, and, if an accessory building in support of such facility is constructed on a parcel, no other accessory buildings not used in support of such facilities shall be constructed until support buildings are removed.

The County's Detached Accessory Building Regulations set a maximum lot coverage of 30% of the rear yard area and a floor area limit of 1,000 sq. ft. for an accessory building. As shown in Table 1 above, the total lot coverage area consumed by buildings used in support of existing and proposed facilities total approximately 275 sq. ft. This amount is much less than 30% of the rear yard area and 1,000 sq. ft. There are no accessory structures not used in support of such facilities at the property.

(11) Section 6512.2.K permits in any Residential (R) District, ground-mounted towers, spires and associated structures provided that they shall not cover more than 15% in area of the lot nor an area greater than 1,600 sq. ft. Buildings, shelters, and cabinets shall be grouped. Towers, spires, and poles shall also be grouped, to the extent feasible for the technology.

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<sup>&</sup>lt;sup>6</sup> Planning staff notes that only structures that are 18" or greater in height from the ground are counted toward lot coverage and that this calculation excludes areas within lease areas that do not contain equipment, as well as the areas covered by fences and gates.

The lot coverage of Verizon proposed structures is approximately 200 sq. ft., where existing structures and project-related structures equal less than a total of 300 sq. ft., covering less than 2% of the 25,155 sq. ft. project site. The proposed equipment area is group with equipment areas for existing facilities. The proposed antenna pole is adjacent to and grouped with the proposed equipment area. As mitigated, the antenna pole will be camouflaged in a tree-like form and would blend in with the forest environment.

(12) Section 6512.2.L prohibits the installation of diesel generators as an emergency power source unless the use of electricity, natural gas, solar, wind or other renewable energy sources are not feasible.

While an emergency generator receptacle (location for plugging in a mobile generator brought in from off-site should an emergency occur) is proposed in the right side yard, the applicant does not propose to install any generators.

b. Performance Standards for New Wireless Telecommunication Facilities

As proposed and conditioned, the facility meets the required performance standards of Section 6512.3 for new wireless telecommunication facilities regarding lighting, licensing, provision of a permanent power source, timely removal of the facility, visual resource protection, erosion control, and availability of the facility for County public safety communication use. Condition No. 9 requires proper Federal Communications Commission (FCC) licenses to be maintained. Condition Nos. 8 and 10 require maintenance and/or removal of the facility when necessary. Condition No. 13 requires the property owner to make the facility available for County public safety communication use, subject to reasonable terms and conditions. Power for the facility exists on-site and the visual impacts of the project are adequately mitigated. No lighting is proposed and only minor grading is necessary for project implementation.

In addition to meeting the aforementioned standards, the application meets all other standards found in the Wireless Telecommunication Facilities Regulations, and addresses all submission requirements raised within the regulation.

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<sup>&</sup>lt;sup>7</sup> Planning staff notes that only structures that are 18" or greater in height from the ground are counted toward lot coverage and that this calculation excludes areas within lease areas that do not contain equipment, as well as the areas covered by fences and gates.

## 4. Compliance with Use Permit Findings

For the use permit to be approved by the Planning Commission, the following findings must be made:

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

New cellular communications facilities, such as the proposed project, require the submittal and review of radio frequency (RF) reports to ensure that the RF emissions from the proposed antennas do not exceed the Federal Communications Commission (FCC) public exposure limits. As discussed in the IS/MND and in Attachment C of the IS/MND, Hammet & Edison, Inc., Consulting Engineers, conducted an evaluation of the proposed project for compliance with applicable guidelines limiting human exposure to RF electromagnetic fields, with the results described in a letter dated January 28, 2013. The evaluation includes the proposed Verizon wireless telecommunications facility, existing facilities at the site. and proposed facilities for AT&T and Metro PCS.8 In the letter, Mr. Hammett states that the proposed operation will, together with the existing and proposed base stations at the site, comply with FCC guidelines limiting public exposure to RF energy. Specifically, Mr. Hammett states that the Verizon antennas, due to their mounting location, would not be accessible to the general public, and therefore. no mitigation measures are necessary to comply with the FCC public exposure guidelines. In a letter dated February 4, 2015, included as Attachment G, Andrea Bright, P.E., of William Hammett of Hammet & Edison, Inc., Consulting Engineers, evaluates the current proposal (revised to comply with Mitigation Measure 11), making the same findings as described in the January 28, 2013 letter.

Also, as discussed in the IS/MND, routine maintenance of the otherwise non-staffed facility does not generate significant traffic. Based on the IS/MND, staff has determined that the project, as proposed and conditioned, will not have a negative environmental, health or visual impact on persons or property in the vicinity.

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

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<sup>&</sup>lt;sup>8</sup> While Metro PCS has a pending application for a new facility at this site, in Spring 2013, Metro PCS merged with T-Mobile to form "T-Mobile US." As a T-Mobile facility already exists at this site and due to inactivity of the Metro PCS application, it is assumed that the Metro PCS project is no longer needed. Should the application become active, project impacts, if not already evaluated in the IS/MND, would need to be analyzed and the project reviewed for compliance with the Wireless Telecommunication Facilities Ordinance.

The proposed facility will provide cellular service to the area, including traditional wireless service such as wireless digital telephone service and new services not available under some traditional analog cellular systems, such as wireless internet connections. The facility would benefit the community by providing improved coverage by bridging existing services areas currently separated by a service gap, and would support the County's E-911. Staff has reviewed the project file, referred the project to the reviewing agencies as listed in the staff report, conducted a site inspection, and finds that the project complies with the required findings for approval of a use permit.

## 5. Compliance with the Significant Tree Regulations

In Design Review (DR) Districts, the County's Significant Tree Regulations define significant trees as any tree that is 6" or more in diameter. As discussed in Section 4.e of the IS/MND, the applicant proposes to remove two significant Monterey pine trees (Trees #15 and #16) which overhang the proposed equipment pad and are located within the proposed 5-foot access and utility route. Staff finds that the tree removal proposal meets the required criteria for permit approval, specifically Chapter 28.1 (Design Review District) of the San Mateo County Zoning Regulations. Section 6565.21 of this chapter allows for the removal of trees that are too closely located to existing or proposed structures and calls for the replacement of each lost tree with up to three (3) 5-gallon size trees. The tree removal proposal is necessary for the construction and maintenance of and access to the proposed wireless telecommunications facility and associated equipment. Per Mitigation Measure 4 (Condition No. 18), the two removed significant trees would be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock.

The applicant also proposes to remove 18 small, non-significant trees which are in poor condition, based on the recommendation of the project arborist, David L. Babby (Registered Consulting Arborist #399). These trees were planted as screening trees for the existing wireless facilities but suffered due to the lack of proper irrigation and deer damage. The removal of these trees do not require a Significant Tree Removal Permit, but, as they are required for screening of existing facilities, must be replaced at a 1:1 ratio per Condition No. 18. The condition also allows for a fewer number of larger replacement trees to be used, under recommendation by an arborist, in lieu of the ratio-based requirement.

Previously, the applicant also proposed to remove two hazardous significant pine trees (Trees #9 and #10). These trees are located along the right shared property line, where the neighbor (who owns one tree solely and has shared ownership of the other) has not provided authorization for the removal of the trees. Because a County-issued Tree Removal Permit requires the concurrence of the affected property owner, and the property-line tree is the joint property of the adjacent owner landowners, the

County cannot authorize removal of these two trees over the objection of one co-owner. Thus, none of the permits recommended for approval by the Planning Commission will authorize the removal of these two trees.

#### B. ENVIRONMENTAL REVIEW

While the project involves the construction of small structures which may be categorically exempt under Section 15303 (*New Construction or Conversion of Small Structures*), the project is not exempt from the California Environmental Quality Act (CEQA). Section 15300.2 (*Exceptions*) prohibits the use of a categorical exemption for projects which are ordinarily insignificant in its impact on the environment, but, due to its location in a particularly sensitive environment, may result in significant impacts. The project would be located on a ridgeline and would be visible from Edgewood Road, a County-designated "scenic route." In addition, in a letter dated April 12, 2012, County Counsel determined, per CEQA Section 15063, an Initial Study is required to study the potential for significant cumulative impact(s) of existing and proposed facilities. Potential significant cumulative impact(s) may include, but are not limited to, radio frequency emissions and visual impacts. Table 3, below, describes all existing and proposed wireless telecommunication facilities at the subject property:

	Table 3			
	Existing and Proposed Facilities at 1175 Palomar Drive			
Case Number	Carrier	New or Existing Facility	Facility Description	Project Status
PLN 2000- 00497	Sprint	Existing Facility	Two (2) existing 13' 6" ht. antenna poles each within a 16 sq. ft. lease area and a 270 sq. ft. equipment lease area.	Existing facility; no pending applications.
PLN 2001- 00801	T- Mobile <sup>9</sup>	Existing Facility	Existing 15' ht. antenna pole. Proposed pole height increase to 16' 7" ht. with 211 sq. ft. equipment lease area.	Use permit recently renewed. Height increase approved (administrative decision).
PLN 2005- 00306	Verizon	New Facility	Previous Proposal: Three (3) proposed 20' ht. antenna poles, two within a 16 sq. ft. lease area and one within a 263.19 sq. ft. equipment lease area.	Application is complete and, as modified, is the subject of this review.

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<sup>&</sup>lt;sup>9</sup> Metro PCS also has a pending application for a new facility at this site. In Spring 2013, Metro PCS merged with T-Mobile to form "T-Mobile US." As a T-Mobile facility already exists at this site and due to inactivity of the Metro PCS application, it is assumed that the Metro PCS project is no longer needed and, therefore, the project is not analyzed in this document. T-Mobile has been contacted by Staff to confirm this assumption. At the time of the preparation of this document, the status of this project has not been confirmed.

Table 3 Existing and Proposed Facilities at 1175 Palomar Drive				
Case Number	Carrier	New or Existing Facility	Facility Description	Project Status
PLN 2010- 00274	AT&T	New Facility	Two (2) proposed 15' ht. antenna poles each within a 16 sq. ft. lease area and a proposed 96 sq. ft. equipment lease area.	Application is incomplete; public hearing has not been scheduled.
	Totals:	4 Facilities	Eight (8) Poles and approx	ximately 936.19 sq. ft. of lease space
PLN2005- 00261	Metro PCS	New Facility	Two (2) proposed 15' ht. antenna poles and a proposed 140 sq. ft. equipment lease area.  Application is incomplete since 2007. The proposed facility was not included in the cumulative analysis of the IS/MND, as a T-Mobile facility already exists at this site, and due to inactivity of the Metro PCS application. In Spring 2013, Metro PCS merged with T-Mobile to form "T-Mobile US." Should the Metro PCS application become active, impacts of a third camouflaged antenna pole have been studied in the IS/MND.	

Note: Existing facilities are shaded; New facilities are shown unshaded. Each facility description represents the facility as it existed or was proposed at the time of the preparation of this document.

An Initial Study was completed and a Mitigated Negative Declaration issued in conformance with CEQA Guidelines. When implemented, the project, as proposed and mitigated, would ensure that impacts are not significant.

### 1. Recommended Changes to Mitigation Measures

Staff recommends the following changes to mitigation measures of the IS/MND to improve clarity and to respond to concerns raised by neighbors, as described below:

a. Revise Mitigation Measure 2 (Condition No. 16) to eliminate the requirement to remove two Monterey pine trees (Trees #9 and #10) located along the right shared property line as the neighbor does not consent to their removal. The change to this mitigation measure would not increase direct project environmental impacts, including visual or safety impacts. In refusing to authorize the removal of these trees, the trees' owners assume responsibility to manage the risks associated with maintaining these trees. Also, the maintenance of the trees will increase project screening from neighboring properties and help to maintain the forested environment of the site. Staff's revision of the mitigation measure does not require re-circulation of the IS/MND, as the mitigation measure has been strengthened to reduce visual impacts, without increasing project conflict with the County regulations pertaining to tree preservation.

- b. Revise Mitigation Measure 4 (Condition No. 18) to require a maintenance surety deposit of \$4,000.00 and consultation with an arborist to determine whether larger, fewer trees should be planted instead of numerous smaller trees. Staff's revision of the mitigation measure does not require re-circulation of the IS/MND, as the mitigation measure has been strengthened to ensure maintenance of replacement trees and to minimize potential harm to existing trees that would provide screening of the project.
- c. Delete Mitigation Measure 12 which limits the location of a generator at the project site. Staff misunderstood the proposal for an "emergency generator receptacle" to be the proposal for an emergency generator. As a generator is not a part of the subject proposal, the inclusion of this mitigation measure might be construed as allowing equipment beyond the scope of the proposal. Staff recommends the deletion of this mitigation measure in order to prevent the location of a generator and associated impacts to noise and air quality in association with the project.
- d. Staff recommended minor edits to Mitigation Measures 3, 5, and 11 (Condition Nos. 17, 19, and 25), as shown in Attachment A, to further clarify the intent and timing requirements of the respective mitigation measure.

California Environmental Quality Act Guidelines Section 15073.5(c) states that recirculation is not required when mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1. Staff's revision of the mitigation measures identified above do not require recirculation of the IS/MND as the mitigation measures have been strengthened and clarified.

2. Comments from Members of the Public received during the Public Review Period

The public review period for the IS/MND was January 21, 2014 to February 10, 2014. During the comment period, staff received comment letters from the persons listed below, with a summary of major concerns (comment letters are included in their entirety as attachments to this report):

- a. Alicia Torre and Jonathan Nimer (Property Owners of 1354 Pebble Drive, San Carlos) (Attachment J.1)
  - (1) Ms. Torre and Mr. Nimer support Mitigation Measure 11 (Condition No. 25), but object to the unspecified "alternative means of reducing scenic impact" provided in Mitigation Measure 11.c. In order to bring the project into compliance with General Plan Policy 4.27 (Ridgelines and Skylines), Mitigation Measure 11 requires Verizon and AT&T applicants to consider

alternative building site(s) which are not on a ridgeline, to use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) should the applicant decide to pursue the project at the subject site, and to reduce the total number of antenna poles proposed for new installation to a maximum of three poles, "unless doing so would directly result in a gap in service, in which case alternative means of reducing scenic impact shall be proposed and implemented, subject to the approval of the Community Development Director." Ms. Torre and Mr. Nimer oppose the language, as underlined above, as it does not offer specific alternate mitigation. Ms. Torre and Mr. Nimer suggest that, due to the ambiguity of alternate mitigation, and therefore, ambiguity in its effect at mitigation, the County cannot find that the environmental impact of the project is less than significant. Unless language is removed or re-worded, Ms. Torre and Mr. Nimer suggest that a full Environmental Impact Report (EIR) is required.

Staff Response: The underlined wording was added by County Counsel with the intention of lending limited flexibility to the mitigation measure's form and maximum number requirements on antenna poles, in order to retain the feasibility of the project as mitigated, should the applicant demonstrate that the form and number requirement for poles would directly result in a significant gap in service. 10 Staff has revised Mitigation Measure 11.c in Attachment A (changes shown in underline and strike through format) to better reflect County Counsel's intentions and to require public noticing and hearing of any alternate proposal. Staff notes that while the applicant has revised the proposal to reduce the number of proposed antenna poles from three to one camouflaged antenna pole, the mitigation measure, as clarified, would apply to pending and future applications for wireless telecommunication facilities at this site.

(2) Ms. Torre and Mr. Nimer state that the IS/MND should be revised and recirculated to include a consistent project description and analysis, including an RF report, visual simulations, site plans, and landscaping plans that reflect the current project.

<u>Staff Response</u>: The IS/MND considers the cumulative effects of all existing facilities and pending proposals at the project site, proposals which vary in their levels of "completeness." Such

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Section 15041(a) of the CEQA Guidelines gives a lead agency for a project the authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law.

proposals include the Verizon project which has been deemed complete, as well as the AT&T (PLN 2010-00274) and Metro PCS (PLN 2005-00261) proposals which are incomplete and vary in their level of activity. The Verizon project was deemed complete on November 1, 2013. Staff balanced Verizon's desire for timely case processing with the need to prepare a IS/MND which studies cumulative impacts of all pending projects and determined that there is an adequate level of detail for such analysis. Staff determined that there was not adequate detail and case activity to include Metro PCS in the IS/MND, as current plans were received in 2007 (prior to adoption of the Wireless Telecommunication Facilities Ordinance), there has been little subsequent case activity. Metro PCS was acquired by T-Mobile in Spring 2013, and there is an existing T-Mobile facility already at this location. Staff determined that the AT&T proposal had adequate detail and case activity to include it in the IS/MND, with plans dated June 20, 2013, despite out-of-date visual simulations.

(3) Ms. Torre and Mr. Nimer state that a printing error of
Attachment B of the IS/MND obscured the labels of the plans
showing existing and proposed facilities.

<u>Staff Response</u>: In addition to plans being available at the Planning and Building Department, staff emailed a clear version of the plans included in the IS/MND to Ms. Torre, Ms. Einspahr, and Kurt Oppenheimer (then president of the Palomar Property Owners Association<sup>11</sup>) on February 12, 2014 and the revised project plans on February 24, 2015.

(4) Ms. Torre and Mr. Nimer state that Section 1 (Aesthetics) of the IS/MND asserts that the project is in substantial conformance with the Wireless Telecommunication Facilities Regulations without providing any evidence. Ms. Torre and Mr. Nimer state that the IS/MND should analyze the project at full build-out, including the Metro PCS proposal and any other future sites.

Staff Response: The IS/MND determined that the project is in substantial conformance with the Wireless Telecommunication Facilities Regulations for the purpose of analyzing project impact according to CEQA. The IS/MND evaluated the proposed Verizon wireless telecommunications facility, existing facilities at the site, and proposed facilities for AT&T. As previously described, due to the long-term inactivity of the Metro PCS proposal, the impacts of the Metro PCS proposal were not

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<sup>&</sup>lt;sup>11</sup> Current president is Michael Kubiak, who has been notified of the project.

specifically evaluated.<sup>12</sup> However, staff notes that, should the Metro PCS application become active, impacts of a third camouflaged antenna pole have been studied in the IS/MND.

A detailed zoning compliance analysis of the Verizon proposal is included in Section A.3 of this report. Revised Mitigation Measure 11 of the IS/MND (Condition No. 25) limits the number of new antenna poles to a maximum of three, regardless of carrier, in order to bring the project into compliance with General Plan Policy 4.27 (*Ridgelines and Skylines*). Therefore, the IS/MND represents the site at full build-out by limiting build-out to three new antenna poles.

(5) Ms. Torre and Mr. Nimer state that the IS/MND includes a proposal by Verizon to remove two trees (Trees #9 and #10 of the arborist report) that are not soley located on the subject parcel.

Staff Response: The survey prepared by Hayes Land Surveying and Mapping shows that the trunk of Tree #10 (a 24" d.b.h. Monterey pine in poor condition) is located on the Torre/Nimer property at 1354 Pebble Drive, San Carlos. The trunk of Tree #9 (a 22" d.b.h. Monterey pine in poor condition) is located on both the subject property and the Torre/Nimer property. While the arborist report, dated February 23, 2012, recommends removal of the trees based on a significant safety risk to adjacent homes and residents, in a letter dated February 10, 2014, Ms. Torre and Mr. Nimer state that they do not authorize the removal of these trees. Likewise, Mitigation Measure 2 (Condition No. 16) has been revised to eliminate the requirement to remove these trees.

(6) Ms. Torre and Mr. Nimer express concerns about whether all 36, 5-gallon trees can be planted without harming existing trees and suggest that a fewer number of larger replacement trees can be planted to mitigate potential harm.

<u>Staff Response</u>: Page 11 of the IS/MND states that "Planning staff may authorize the planting of larger trees in-lieu of planting several smaller replacement trees (e.g., one (1) 24' box in-lieu of five (5) 5-gallon trees)." Condition No. 18.g requires this evaluation by an arborist.

(7) Ms. Torre and Mr. Nimer support the performance and maintenance surety deposit for tree replanting required by

<sup>&</sup>lt;sup>12</sup> While Metro PCS has a pending application for a new facility at this site, in Spring 2013, Metro PCS merged with T-Mobile to form "T-Mobile US." As a T-Mobile facility already exists at this site and due to inactivity of the Metro PCS application, it is assumed that the Metro PCS project is no longer needed.

Mitigation Measure 4.c. (Condition No. 18) but suggest that the deposit amount should be raised to \$10,000.00 to include the actual costs of planting, irrigation, deer fencing and maintenance.

Staff Response: On February 12, 2014, staff requested the Verizon application to obtain a market-value estimate for planting, irrigation, deer fencing and maintenance of new and existing trees. The applicant has obtained an estimate of \$6,000.00. Mitigation Measure 4.c (Condition No. 18) has been revised to reflect this amount, where \$4,000.00 is estimated for the planting and maintenance of new trees and \$2,000.00 is estimated for the maintenance of existing trees.

# b. Sally Einspahr (Property Owner of 1165 Palomar Drive, Redwood City) (Attachment J.2)

(1) Ms. Einspahr states that five more sites would change the use of the property from a residential use to an industrial use and that eight or more cell towers at the property will decrease property values in the area.

Staff Response: As proposed and mitigated, the project would result in four antenna poles at the subject property, three existing, and one new pole that would be tree-like in form. While the project's potential effect on home values is outside the scope of this review, it is anticipated that, as mitigated, the project would minimize any negative affect of the facilities on home values as the camouflaged pole would be less visible. The Wireless Telecommunication Facilities Regulations establish such facilities as a permitted use in residential districts, subject to the issuance of a use permit and project compliance with standards as listed in the regulation.

(2) Ms. Einspahr supports Mitigation Measure 11 (Condition No. 25), but objects to the unspecified "alternative means of reducing scenic impact" provided in Mitigation Measure 11.c.

<u>Staff Response</u>: This concern is addressed in Section B.2.a.(1), above.

(3) Ms. Einspahr states that an alternate site feasibility study should have been included in the IS/MND and adds that several alternate sites were suggested by the Palomar Property Owners in a presentation made to the County Board of Supervisors regarding the proposed Sprint Use Permit Renewal (PLN 2000-00497) on December 1, 2010.

Staff Response: For the purposes of CEQA, the proposal is in substantial conformance with the Wireless Telecommunication Facilities Regulations, including the development and design standard referenced by Ms. Einspahr. Compliance with this standard is discussed in Section A.3 of this report, above. On February 18, 2015, the applicant provided a feasibility analysis for other sites listed in the presentation: (1) Water Tower 1 in Pulgas Ridge Park; (2) Water Tower 2 above Cordilleras Mental Health Center; (3) Water Tower 3 at 602 Glenloch Way; and (4) San Francisco Water District Pumping Station at Edgewood Road and Crestview Drive (Attachment I). The applicant has deemed these sites to be infeasible as they do not meet project coverage goals.

(4) Ms. Einspahr states that the IS/MND should analyze the project at full build-out, including the Metro PCS proposal (PLN 2005-00261) and any other future sites.

<u>Staff Response</u>: This concern is addressed in Section B.2.a.(4), above.

(5) Ms. Einspahr states that the IS/MND should be revised and recirculated to include a consistent project description and analysis, including an RF report that reflects the current project.

<u>Staff Response</u>: This concern is addressed in Section B.2.a.(2), above.

(6) Ms. Einspahr states that the project conflicts with Design
Standards for Palomar Park which requires projects to minimize
alteration of the natural topography and requires projects to
respect the privacy of neighboring homes and outdoor living
areas.

Staff Response: Ms. Einspahr cites two requirements of Section 6565.16 (Standards for Design in Palomar Park) of the Zoning Regulations. The intent of these standards is to minimize grading and provide guidance for the location of new living areas relative to neighboring homes and outdoor living areas in order to protect privacy. The project involves minimal grading and does not involve the introduction of new living areas.

(7) Ms. Einspahr states that the Verizon proposal involves the removal of "perfectly good trees" with new trees that "never live for more than a few months" and consume too much water. She also states that the arborist report is old (citing a 2009 date), that the surety deposit should be raised to \$10,000.00, and that the

watering of trees could cause the hill to slide (citing a history of mud slides in the area).

Staff Response: The arborist report is dated February 23, 2012, and is considered adequately current. As discussed in Section B.2.a.(5), two Monterey pine trees originally proposed for removal will be retained. Mitigation Measure 3 (Condition No. 17) requires the protection of retained trees and requires the applicant to provide a surety deposit for the care of retained trees. Mitigation Measure 4 (Condition No. 18) requires the maintenance of new trees and five (5) years of tree monitoring, with required annual reporting. The concern regarding the surety deposit is addressed in Section B.2.a.(7), above. Mitigation Measure 5 (Condition No. 19) requires the installation of bubblers for the irrigation of new trees, per the arborist report. Bubblers will be staked to the ground and will provide the necessary amount of water without oversaturation of the ground. The new landscaping will likely increase soil stability, as the trees take root and mature.

Following the close of the IS/MND public review period and prior to the preparation of this report, staff received four additional comments letters, included in Attachment K. Commenters expressed concern regarding allowing such facilities in residential areas, radiation from antennas, loss of property value, and use of privately maintained roads by commercial vehicles. The County allows the location of wireless telecommunication facilities in residential areas, subject to Section 6510 of the Zoning Regulations. As discussed in Section A.3 of this report, above, the project, as proposed and conditioned, complies with these requirements. Regarding the impact of radiation from existing and proposed facilities, see Section A.4 of this report, above. Regarding loss of property value, see Section B.2.b.(1) of this report. The Department of Public Works staff has confirmed that this section of Palomar Drive is a privately maintained road (non-County right-of-way) and owned by adjacent property owners. Owners of the road may choose to restrict legal access to their portion of the road by civil means that do not involve the County.

The commenters also state that the facility would not improve coverage for community residents and assert that coverage goals can be met through improvements on other sites. Coverage maps included as Attachment E show coverage benefits to the immediate project area. As discussed in Section B.2.b.(3) of this report, the applicant has addressed the feasibility of the alternate locations previously identified by the property owners association. Comment letters received after the preparation of this report will be addressed at the public hearing.

#### C. REVIEWING AGENCIES

Building Inspection Section
County Department of Public Works
County Environmental Health Division
County Fire Authority
County Sheriff's Office of Emergency Services
Palomar Property Owners Association

## **ATTACHMENTS**

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Project Plans, dated April 17, 2014
- D. Letter from County Counsel Regarding CEQA, dated April 12, 2012
- E. Current and Proposed Coverage Maps, submitted February 18, 2015
- F. Initial Study/Mitigated Negative Declaration, dated January 21, 2014
- G. Updated RF Report, submitted February 18, 2015
- H. Updated Visual Simulations, submitted February 18, 2015
- I. Feasibility Analysis of Alternate Sites, submitted February 18, 2015
- J. Comment letters received during the IS/MND Comment Period:
  - Comment Letters from Torre/Niman, received February 10, 2014 and March 25, 2015
  - 2. Comment Letter from Sally Einspahr, received February 10, 2014
- K. Comment Letters received prior to the preparation of this report:
  - 1. Bob Guenley, received April 24, 2014
  - 2. Thomas M. Nachbaur, received April 26, 2014
  - 3. Chris Myers, received April 30, 2014
  - 4. Nola Davis, received May 12, 2014

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# County of San Mateo Planning and Building Department

## RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2005-00306 Hearing Date: April 22, 2015

Prepared By: Camille Leung For Adoption By: Planning Commission

Project Planner

#### **RECOMMENDED FINDINGS**

Regarding the Initial Study and Mitigated Negative Declaration, Find:

- 1. That the Initial Study/Mitigated Negative Declaration (IS/MND) is complete, correct and adequate, and prepared in accordance with the California Environmental Quality Act (CEQA) and applicable State and County Guidelines. Potential significant cumulative impact(s) of the project may include, but are not limited to, radio frequency emissions and visual impacts. An Initial Study was completed and a Mitigated Negative Declaration issued in conformance with CEQA Guidelines, with a public comment period starting on January 21, 2014 and ending on February 10, 2014. The project, as proposed and mitigated, would not result in significant environmental impacts.
- 2. That, on the basis of the Initial Study/Mitigated Negative Declaration (IS/MND), comments received hereto, and testimony presented and considered at the public hearing, there is no substantial evidence that the project, if subject to the mitigation measures contained in the Mitigated Negative Declaration, will have a significant effect on the environment. For impacts identified in the IS/MND as "significant unless mitigated," the mitigation measures, when implemented, ensure that impacts are not significant. Specifically, the applicant proposes to camouflage a new antenna pole in a tree like form in compliance with Mitigation Measure 11 of IS/MND in order to reduce the visual impacts of the project, including but not limited to view impacts from Edgewood Road, a County-designated "scenic route."
- 3. That the mitigation measures identified in the Mitigated Negative Declaration, agreed to by the applicant, placed as conditions on the project, and identified as part of this public hearing, have been incorporated into the Mitigation Monitoring and Reporting Plan in conformance with California Public Resources Code Section 21081.6. Proposed mitigation measures are included as Condition Nos. 17 through 28 below. Staff has revised Mitigation Measures 2, 3, 4, 5 and 11; and deleted Mitigation Measure 12 to strengthen and clarify the required mitigation. Staff's revision of mitigation measures does not require recirculation of

the Initial Study/Mitigated Negative Declaration. California Environmental Quality Act Guidelines Section 15073.5(c) states that recirculation is not required when mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.

4. That the IS/MND reflects the independent judgment of San Mateo County.

#### Regarding the Use Permit, Find:

- 5. That the establishment, maintenance and/or conducting of the use will not, under the circumstances of this particular case, be detrimental to the public welfare or injurious to the property or improvements in said neighborhood because the project will meet the current Federal Communications Commission (FCC) standards and has been conditioned to maintain a valid FCC license. In addition, routine maintenance of the otherwise non-staffed facility does not generate significant traffic.
- 6. That this telecommunications facility is necessary for the public health, safety, convenience or welfare of the community because the project will provide cellular service in the area, including traditional wireless service such as wireless digital telephone service and new services not available under some traditional analog cellular systems, such as wireless internet connections. The facility will benefit the community by providing improved coverage and support the E-911 system of the County. Staff has reviewed the project file, referred the project to the reviewing agencies as listed in the staff report, conducted a site inspection, and finds that the project complies with the required findings for approval of a use permit.

#### Regarding the Significant Tree Permit, Find:

7. That the proposal to remove two (2) significant pine trees (Trees #15 and #16) in fair condition as determined by a certified arborist in a letter, dated February 23, 2012, meets the required criteria for permit approval, specifically Chapter 28.1 (Design Review District) of the San Mateo County Zoning Regulations. Section 6565.21 of this chapter allows for the removal of trees that are too closely located to existing or proposed structures and calls for the replacement of each lost tree with up to three (3) 5-gallon size trees. The subject trees overhang the proposed equipment pad and are located within the proposed 5-foot access and utility route. Per Mitigation Measure 4 (Condition No. 18), the two removed significant trees would be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock.

#### RECOMMENDED CONDITIONS OF APPROVAL

## **Current Planning Section**

1. This approval applies only to the proposal, documents and plans described in this report and submitted to and approved by the Planning Commission on April 22,

- 2015. Minor revisions or modifications may be approved by the Community Development Director if they are consistent with the intent of and in substantial conformance with this approval.
- 2. This use permit shall be for the proposed project only, as proposed by Verizon. Any revision determined to be major, including significant facility change or intensification of use, shall require an amendment to the use permit. Amendment to this use permit requires an application for amendment, payment of applicable fees, and consideration at a public hearing.
- 3. Per Section 6512.6 (*Use Permit Term, Renewal and Expiration*), this permit shall be valid for ten (10) years from the date of this approval and shall expire on April 22, 2025. If continuation of this use is desired, the applicant shall file a Use Permit Renewal Application with the Planning and Building Department six (6) months prior to its expiration and pay the fees applicable at that time.

There shall be Administrative Reviews every three (3) years from completion of construction and payment of associated fees, for staff's review of the project for compliance with conditions of approval of this use permit (specifically Condition Nos. 17 and 18), required according to the following schedule:

Due Date	Required Documentation for Review	Administrative Fee Applied?
April 30, 2016 (or at final inspection of building permit)	Use Permit Compliance and Landscape Installation	No
April 30, 2017 (or end of 1st year after construction)	Landscape Maintenance Report	No
April 30, 2018 (or end of 2nd year after construction)	Landscape Maintenance Report	No
April 30, 2019 (or end of 3rd year after construction)	Use Permit Compliance and Landscape Maintenance Report	Yes
April 30, 2020 (or end of 4th year after construction)	Landscape Maintenance Report	No
April 30, 2021 (or end of 5th year after construction)	Landscape Maintenance Report	No
April 30, 2022 (or end of 6th year after construction)	Use Permit Compliance and Landscape Maintenance Report	Yes
January 1, 2025 (or end of 9th year after construction)	Use Permit Compliance and Landscape Maintenance Report	Yes

- 4. This permit authorizes the removal of Trees #15 and #16 and does not authorize the removal of Trees #9 and #10. Trimming or removal of Trees #9 and #10 or any additional significant trees (trees 6" or greater in diameter) or heritage trees requires owner authorization and issuance of a Tree Removal Permit by the County.
- 5. The proposed wooden fence enclosing the proposed equipment lease area shall be stained a medium/dark brown or dark green color to blend in with the forested

environment. Paint colors shall be subject to the review and approval by the Community Development Director prior to issuance of a building permit. The applicant shall submit photos to the Current Planning Section for color verification after the approved colors have been implemented, but before a final building inspection is scheduled.

- 6. The applicant(s) shall pay an environmental filing fee of \$2,210.00, as required under Fish and Wildlife Code Section 711.4(d), plus a \$50.00 County Recorder filing fee to the San Mateo County Clerk within **four (4) working days of the final approval date** of the project.
- 7. Noise levels produced by proposed construction activities shall comply with the San Mateo County Noise Ordinance contained in Chapter 4.88 (Noise Control) of the County Ordinance Code. Construction activities shall be limited to the hours from 7:00 a.m. to 6:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturday. Construction operations shall be prohibited on Sundays, Thanksgiving and Christmas.
- 8. This installation shall be removed in its entirety at that time when this technology becomes obsolete, when the facility is no longer needed to achieve coverage objectives, or if the facility remains inactive for six (6) consecutive months. If any of these circumstances occur, the entire facility, including all antennas and associated equipment, cables, power supplies, etc., shall be removed and the site shall be returned to its pre-construction state. Removal or modification of the facility and associated installations require a demolition/building permit from the Building Inspection Section.
- 9. The applicant shall maintain all necessary licenses and registrations from the Federal Communications Commission (FCC) and any other applicable regulatory bodies for the operation of the subject facility at this site. The applicant shall supply the Planning Department with evidence of such licenses and registrations. If any required license is ever revoked, the applicant shall inform the Planning Department of the revocation within ten (10) days of receiving notice of such revocation.
- 10. The applicant shall maintain the color, materials, and form of the broad leaf monopole and equipment enclosures in a manner that is consistent with the approved plans. Prior to the issuance of a building permit, the applicant shall submit color samples for the facilities (including the broad leaf monopole, antennas, un-screened supporting equipment). The antennas and all associated pole-mounted equipment shall be painted green to match the faux branches of the broad leaf monopole. Paint colors shall be subject to the review and approval by the Community Development Director prior to issuance of a building permit. The applicant shall submit photos to the Current Planning Section for color verification after the approved colors have been implemented, but before a final building inspection is scheduled. There shall be no external lighting associated with the broad leaf monopole cellular antenna poles. Wireless telecommunication facilities

- shall not be lighted or marked unless required by the FCC or Federal Aviation Administration (FAA).
- 11. Prior to the Current Planning Section's approval of the building permit, the applicant (James Cosgrove, NSA Wireless) shall provide the name, title, phone number, mailing address, and email address of one or more contact persons at Verizon, to which future correspondences from the County should be addressed. These person(s) will serve as the long-term contact person(s) for this project for the purposes of permit renewal.
- 12. Should the long-term contact person(s) for the facility change, the property owner is responsible for contacting the County to establish a new long-term contact person(s), for the life of the project.
- 13. If technically practical and without creating any interruption in commercial service caused by electronic magnetic interference (EMI), floor space, tower space and/or rack space for equipment in a wireless telecommunication facility shall be made available to the County for public safety communication use.
- 14. If technically practical and without creating any interruption in commercial service caused by electronic magnetic interference (EMI), Verizon shall consider making floor space, tower space and/or rack space for equipment available in the wireless telecommunication facility to AT&T.

Mitigation Measures 1 through 12 of the Initial Study/ Mitigated Negative

Declaration made available on January 21, 2104 to February 10, 2014, are included
as Condition Nos. 15 through 25 (changes, all minor in nature to strengthen or clarify
the mitigation measure, are shown in underline and strike-through format). While
mitigation measures of the IS/MND relate to other pending applications at the project
site, only the Verizon proposal is the subject of this permit.

- 15. <u>Mitigation Measure 1</u>: Prior to Planning's final approval of the building permit for any new or modified facilities, all new reflective surfaces shall be screened or painted such that surfaces are no longer reflective.
- 16. <u>Mitigation Measure 2</u>: As recommended by David L. Babby (Registered Consulting Arborist #399), in a report dated February 23, 2012, the applicant shall remove 18 trees that are less than 6" in diameter (including 17 dead, one damaged).
- 17. <u>Mitigation Measure 3</u>: For the protection of retained trees, the applicant shall comply with the Tree Protection Measures as outlined in the report prepared by David L. Babby (Registered Consulting Arborist #399), dated February 23, 2012. <u>The applicant shall demonstrate that the measures have been included in plan-form in the building plans for facility construction prior to issuance of the building permit. In addition, the applicant shall consult with Mr. Babby, or other certified arborist, regarding additional measures to improve the health of existing trees (such as irrigation, fencing, trimming, fertilization, treatment, etc.) and demonstrate to County staff the implementation of additional recommendations.</u>

<u>prior to the final approval of the building permit for facility construction</u>. If any of the retained trees should die, the applicant shall replace the tree(s) as outlined in Mitigation Measure 4. Tree removals are subject to Design Review (DR) District Zoning Regulations and County permit requirements.

- 18. <u>Mitigation Measure 4</u>: The property owner shall comply with the following requirements regarding tree replacement:
  - a. For removal of trees that are 6" or more in diameter, these trees shall be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. For trees that are less than 6" in diameter, trees shall be replaced using a minimum of 5-gallon size stock at a 1:1 ratio.
  - b. For indigenous trees, trees shall be replaced using the same species. Exotic trees shall be replaced with an indigenous species.
  - c. A surety deposit of \$4,000.00 for both performance (installation of tree, staking, and providing an irrigation system) and maintenance of planted trees is required prior to the Current Planning Section's approval of the building permit for this project. Maintenance shall be required for five (5) years. Maintenance reports, as prepared by a certified arborist, shall be submitted to the Project Planner on an annual basis by April 30 after planting.
  - d. During the maintenance period, the property owner at his/her expense shall replace any dead or dying tree(s). Under such circumstances, the maintenance period will be extended for a period of two (2) additional years.
  - e. Release of the performance and maintenance surety shall only be allowed upon the satisfactory installation and maintenance and upon inspection by the County.
  - f. A surety deposit of \$2,000.00 for maintenance of existing trees is required prior to the Current Planning Section's approval of the building permit for this project. Maintenance shall be required for five (5) years. Maintenance reports, as prepared by a certified arborist, shall be submitted to the Project Planner on an annual basis by April 30 after planting.
  - g. The applicants shall provide documentation to planning staff to demonstrate their consultation with a certified arborist to advise as to whether all 5-gallon replacement trees can be planted without harming existing trees or whether a fewer number of larger replacement trees should be planted to minimize potential harm to existing trees. In the instance of the latter, the size and number of replacement trees recommended by the arborist, shall be reasonably equivalent with the required number of 5-gallon replacement trees and shall comply with all mitigation measures, as determined by the Community Development Director.

- 19. <u>Mitigation Measure 5</u>: All new tree plantings shall conform to recommendations for "future planting design" as outlined in the <u>arborist</u> report by Mr. Babby.
- 20. <u>Mitigation Measure 6</u>: An archaeologist shall be present on-site to observe all land disturbing activities. Should any cultural resource(s) be found, all work shall cease until an archaeological or paleontological report (as applicable) is provided to Current Planning Section staff and all recommendations of the report are implemented to minimize damage to archaeological and/or paleontological resources.
- 21. Mitigation Measure 7: The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.
- 22. <u>Mitigation Measure 8</u>: The construction or modification of antenna poles and associated equipment requires a building permit. Geotechnical review of each new or modified facility is required at the building permit stage. Each applicant shall demonstrate compliance with geotechnical recommendations in the design of each facility prior to the County's issuance of a building permit.
- 23. Mitigation Measure 9: Prior to the Current Planning Section's approval of the building permit required for each new facility or facility modification, each carrier shall submit an Erosion and Sediment Control Plan, where each plan shall include adequate stormwater pollution prevention measures, as determined by Planning staff. The Erosion and Sediment Control Plan shall be implemented prior to land disturbance and throughout the construction process until all disturbed areas are stabilized or landscaped. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.
- 24. <u>Mitigation Measure 10</u>: The applicant shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including, but not limited to, the following:
  - a. Delineation with field markers of clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses within the vicinity of areas to be disturbed by construction and/or grading.
  - b. Protection of adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.

- c. Performing clearing and earth-moving activities only during dry weather.
- d. Stabilization of all denuded areas and maintenance of erosion control measures continuously between October 1 and April 30.
- e. Storage, handling, and disposal of construction materials and wastes properly, so as to prevent their contact with stormwater.
- f. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- g. Use of sediment controls or filtration to remove sediment when dewatering site and obtain all necessary permits.
- h. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilization of designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- I. Training and providing instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
- m. Additional Best Management Practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.
- n. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.
- 25. <u>Mitigation Measure 11</u>: In order to bring the project into compliance with General Plan Policy 4.27 (*Ridgelines and Skylines*), each applicant for Verizon and AT&T shall demonstrate compliance with the following requirements. If the applicants plan to pursue plans at the subject property, each applicant shall amend project plans and visual simulations to demonstrate compliance with Items b and c, subject to review and approval by Planning staff, prior to the approval of a building permit for each proposal.

- a. Consider alternative building site(s) which are not on a ridgeline. Any new proposal would be subject to CEQA requirements;
- b. In order to comply with County General Plan Policy 4.27 regarding construction on a ridgeline in a forested area, which is part of a public view, the applicants shall use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) that would better conform the project to the ridgeline, forested environment; AND,
- c. Reduce the total number of antenna poles proposed for new installation to a maximum of three poles at the site, whereby the approved facility counts as one new pole and only three new poles would be constructed on the site regardless of carrier, meeting Mitigation Measure 11.b in order to minimize scenic impact, unless doing so would directly result in a significant gap in service, in which case a comparable (in pole form and number) alternative means of reducing scenic impact shall be proposed and implemented, subject to the approval of the Community Development Director Planning Commission.
- 26. No additional grading work shall be done to get the equipment from the front to the rear of the property.
- 27. If a less visually obtrusive/reduced antenna technology becomes available for use during the life of this project, the applicant shall present a redesign incorporating this technology into the project for review by the Community Development Director and any parties that have expressed an interest.
- 28. The applicant shall not enter into a contract with the landowner or lessee which reserves for one company exclusive use of the tower structure or the site for telecommunication facilities.
- 29. Any necessary utilities leading to, or associated with, the facility shall be placed underground.

## Building Inspection Section

30. Prior to initiation of land disturbance (does not include weed management) or construction, the applicant shall obtain a building permit and install the antennas and miscellaneous power/communications lines in accordance with the approved plans and conditions of approval.

## Department of Public Works

31. No land disturbance or construction work within the County right-of-way shall begin until County requirements for the issuance of an encroachment permit, including review of the plans, have been met and an encroachment permit issued.

32. The applicant shall submit, for review by the Public Works Department and the appropriate Fire District, a Plan and Profile of both the existing and the proposed access from the nearest "publicly" maintained roadway to the proposed building site.

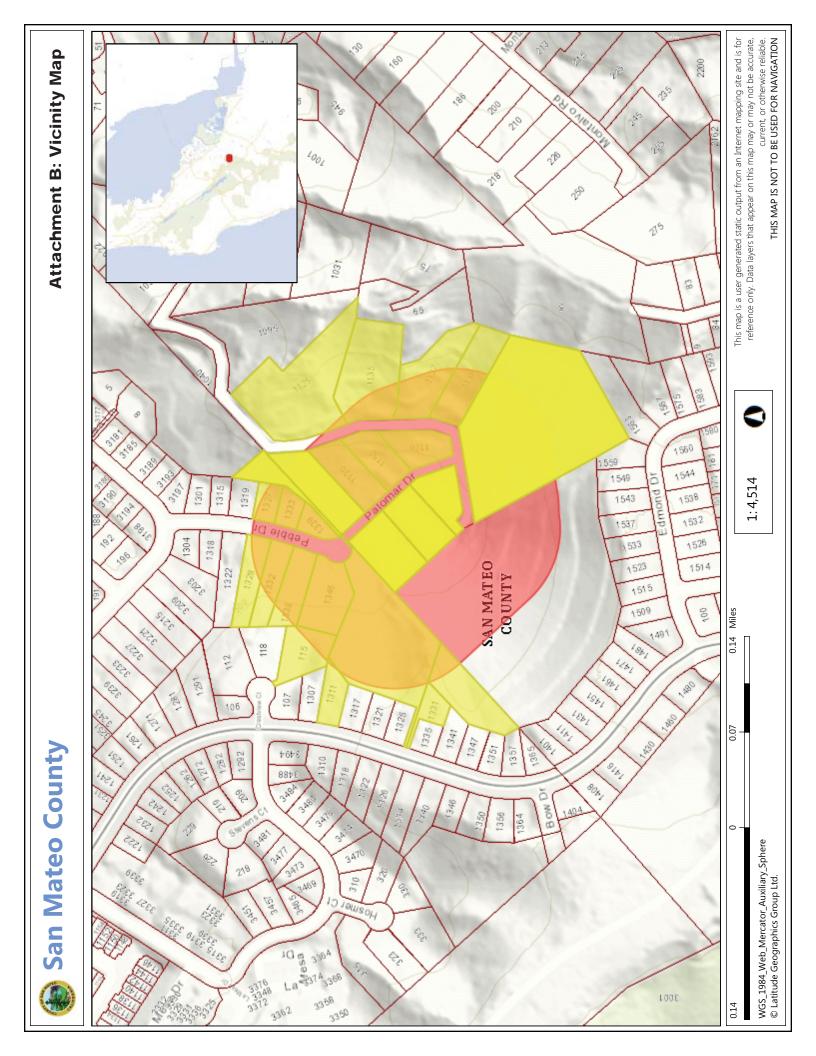
## San Mateo County Fire Department

- 33. Because of limited access into your property, the San Mateo County Fire Department is requiring the installation of a Knox Box, Knox Key Switch, 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.
- 34. Remove that portion of any tree which extends within 10 feet of the entire facility. Trimming of significant or heritage trees requires a permit from the County, per Condition No. 4.
- 35. Contact the San Mateo County Fire Marshal to schedule a Final Inspection prior to occupancy and Final Inspection by a Building Inspector. Please allow for a minimum 48-hour notice to the Fire Department at 650/573-3846.
- 36. The applicant shall submit a driveway "Plan and Profile," to the Department of Public Works, showing the driveway access to the parcel (garage slab) complying with County Standards for driveway slopes (not to exceed 20%) and to County Standards for driveways (at the property line) being the same elevation as the center of the access roadway. When appropriate, this plan and profile shall be prepared from elevations and alignment shown on the roadway improvement plans. The driveway plan shall also include and show specific provisions and details for both the existing and the proposed drainage patterns and drainage facilities.

## County Environmental Health Division

37. The property owner shall maintain the septic system as approved by the County Environmental Health Division. All unpermitted encroachments into the septic field or system are prohibited. At the building application stage, installation of all utility lines and irrigation pipes shall not cross over any portions of the existing septic drainfields. Any damages to the existing septic drainfields shall be repaired with a permit from the County Environmental Health Division.

CL:pac - CMLZ0226\_WPU.DOCX





# EDGEWOOD & CRESTVIEW

SITE NUMBER:

# 123279

REDWOOD CITY, CA 94062 1175 PALOMAR DRIVE SAN MATEO COUNTY

# CODE COMPLIANCE

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# PROJECT TEAM

# CIVIL ENGINEER:

CONNETL DESCH GROUP, ILC 25655 RINCID PROKWAY SOUTH LACE DOEST, CA. 95600 PHONE: (549) 752-8607 FAIL GEOMARD CONNETL CONNECT: DAY CONNETL

OWNER CHELL & BROOKS
CHRIS L. & ETHEL, R. BROOKS
TITTS PALOWAR GRAC
CURITS L. & ETHEL R. BROOKS
(650) 357-6000

1175 PALOWAR DRIVE REDWOOD CITY, CA 94062

SITE ADDRESS:

542.0° (NAVD88) REDWOOD CITY

GROUND ELEVATION

DOCUMENCY TYPE JURSDICTION

CONST. TYPE:

151-416-040

# CONSTRUCTION MANAGER:

PROJECT INFORMATION

APPLICANT
VENZOW WIRELESS
2785 MICHELL DIGNE
WALNET OREBE, CA 94598

(925) 279-6048

SITE ACQUISITION

RAN INSCIENCE, INC.

SAN PAURI, CA HESSA
SAN COMMENT, CH HESSA
FRING CONLINE, CH HESSA
FRING CONTINE, CH HIST
FRING
FRING CONTINE, CH HIST
FRING
FRIN

NSA WREIESS, INC.
2010 CNOW CANTON PL. [355, SAN BAIDN, CA 9453, CONIDCE: SOOT CONN.
FHANK: (707) 689—1144
F-MAI: scel.Comm@nowireles.com

# DRIVING DIRECTIONS

PROJECT DESCRIPTION

THIS PROJECT CONSSIS OF THE CONSTRUCTION OF A NEW VERICON MIRELESS ANTENNA FACILITY INCLUDIAS:

SITE DIRECTIONS FROM VERIZON WRELESS WALNUT CREEK OFFICE.

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# VICINITY MAP (NOT TO SOULE)



# GENERAL CONTRACTOR NOTES

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# DATE APPROVALS VERIZON WIRELESS EQUIPMENT ENCANEES VERIZON WIRELESS RF ENGINEER VERZON WIRELESS REAL ESTATE VERIZON WIRELESS TRANSPORT VERIZON WIRELESS CONSTRUCTION NSA WIRELESS ZONING NSA WIRELESS CONSTRUCTION NSA WIRELESS LEASING

NSA Wireless, Inc.

SAN MACHES BARD, BATTLE D. SAN TANCH, CA SASSA

12/29/14

RENT ISSUE DATE:

100% ZD

8 10/15/14 100% ZD 100% ZD

09/29/14

123279 EDGEWOOD & CRESTVIEW

1175 PALOMAR DR REDWOOD CITY, CA 94062 SAN MATEI COUNTY

Verizonwireless

VERIZON WIRELESS 2785 MITCHELL DRIVE WALNUT CREEK, CA 94598

# SHEET INDEX

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03/19/14 100% ZD 100% ZD

03/03/14

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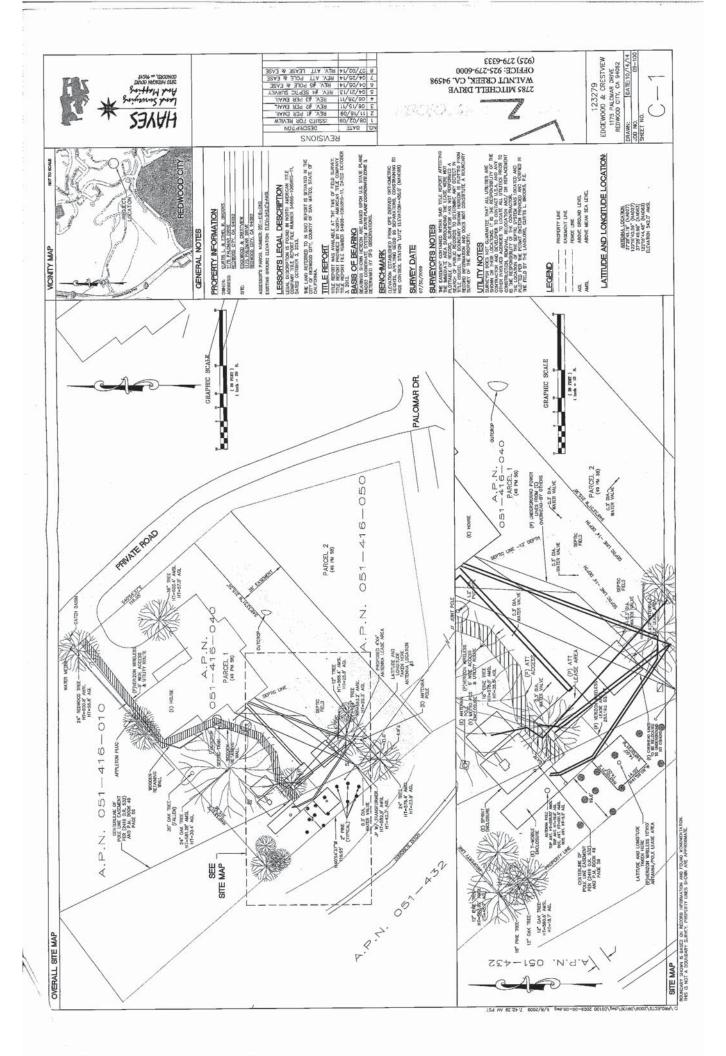
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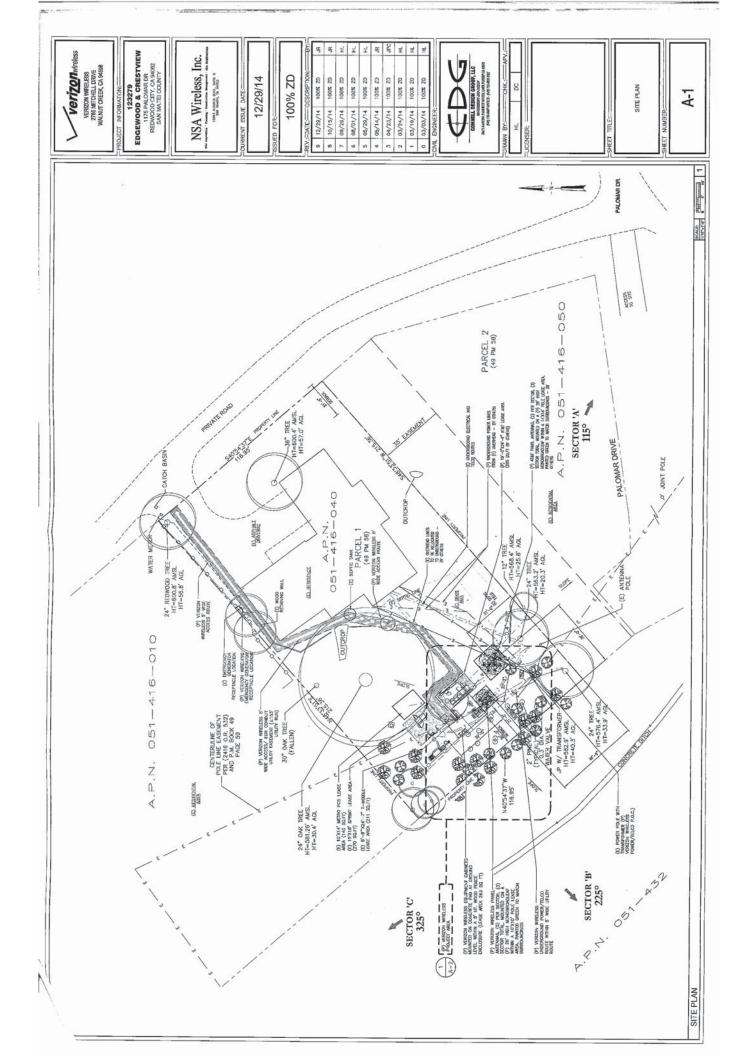
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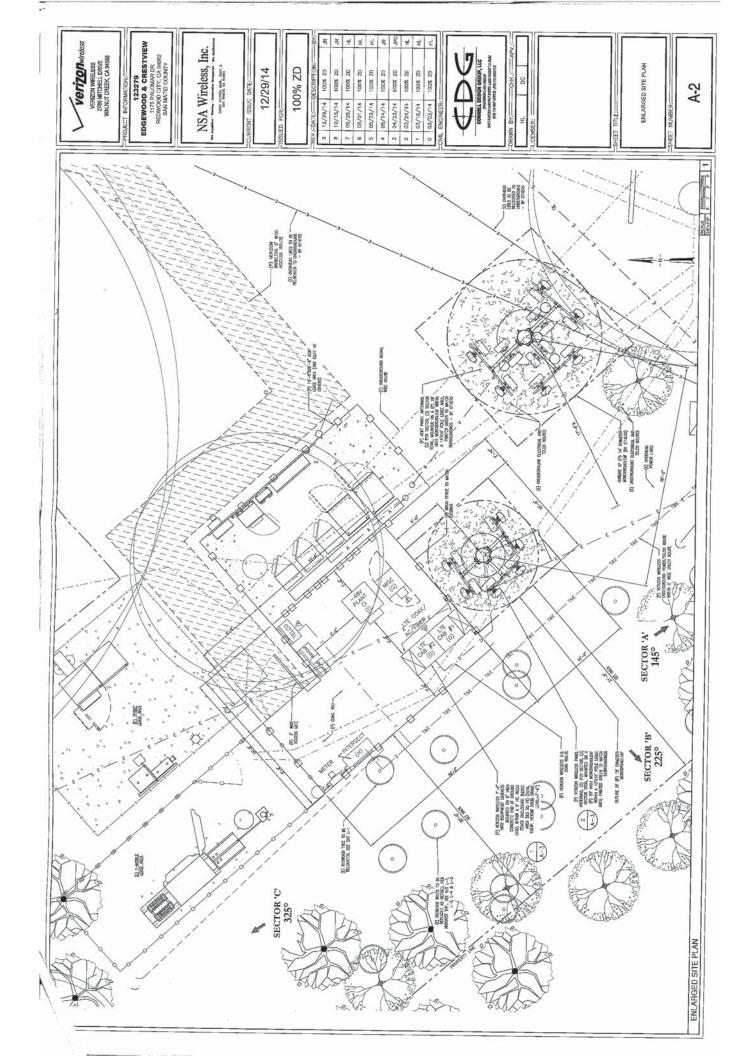
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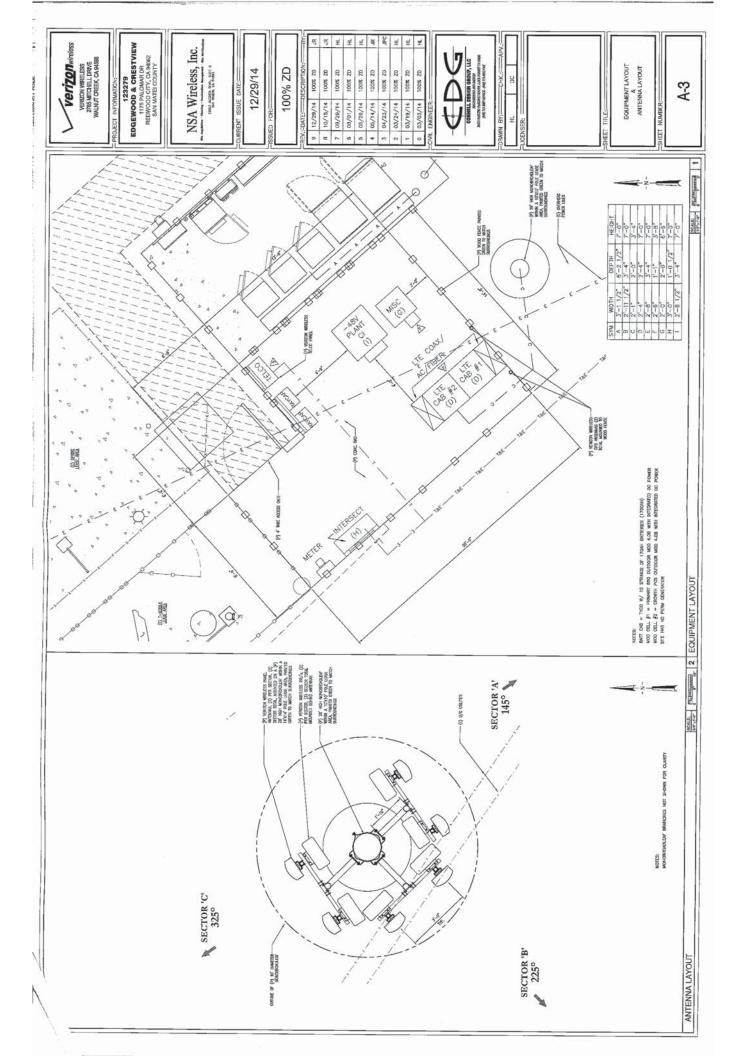
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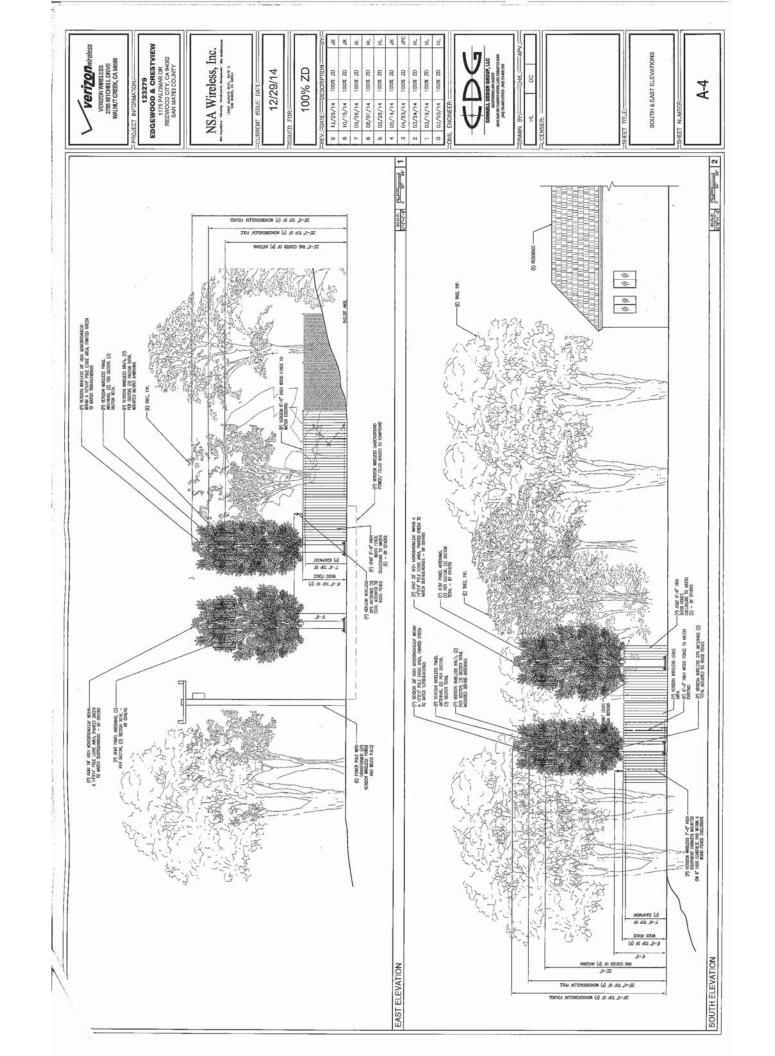
# TITLE SHEET, SITE INFORMATION AND VICINITY MAP Attachment C

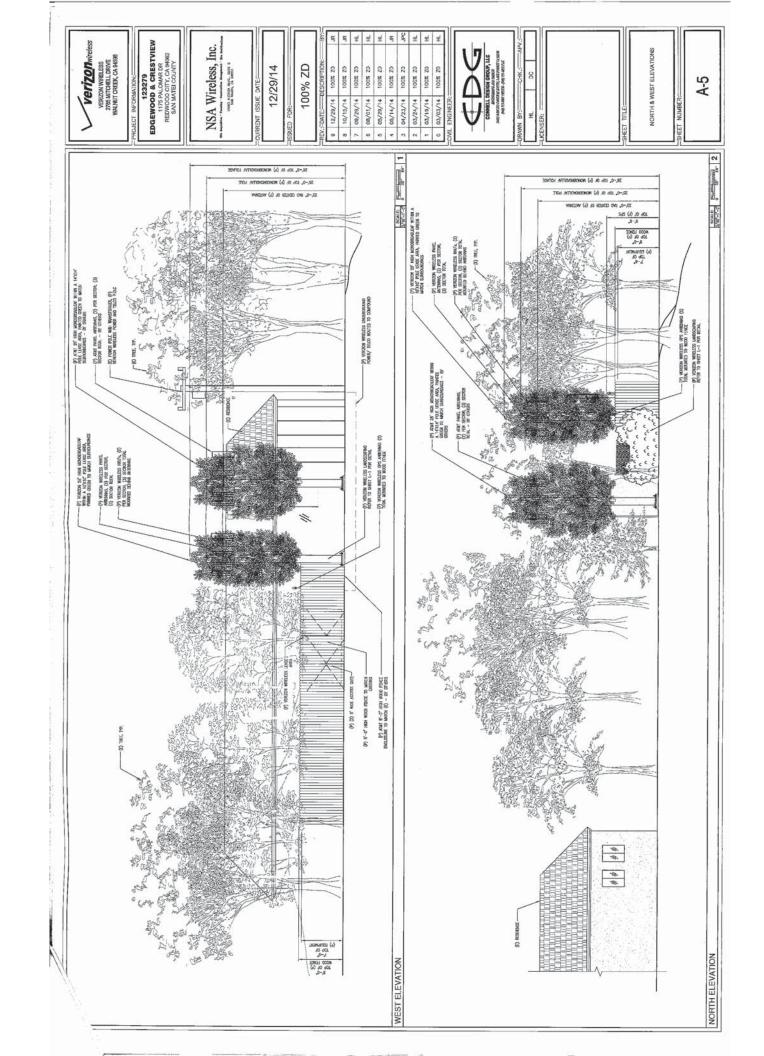


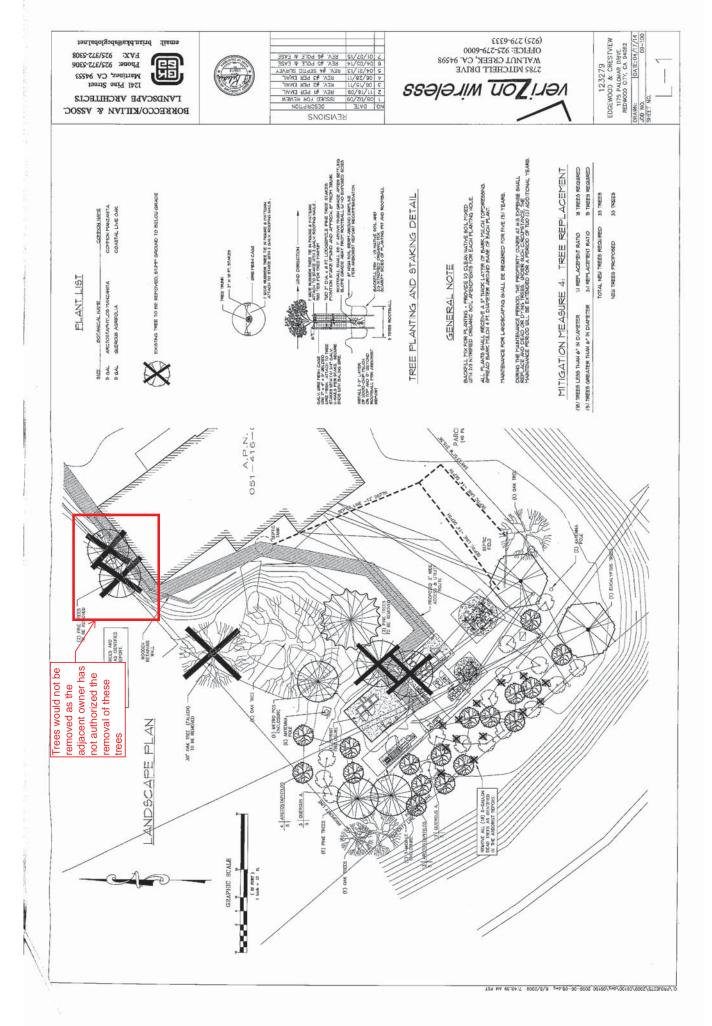


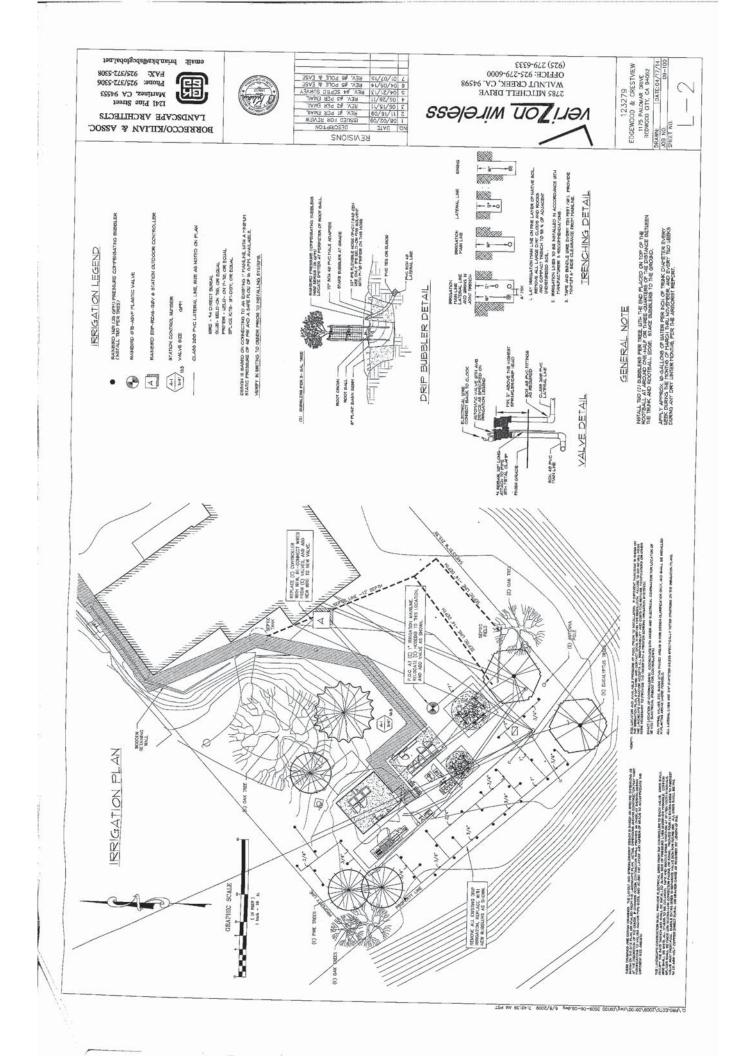












# County of San Mateo



# Planning & Building Department

455 County Center, 2nd Floor Redwood City, California 94063 650/363-4161 Fax: 650/363-4849 Mail Drop PLN122 plngbldg@co.sanmateo.ca.us www.co.sanmateo.ca.us/planning

April 12, 2012

Curtis and Ethel Brooks Property Owners 1175 Palomar Drive Redwood City, CA 94062

Dear Mr. and Mrs. Brooks:

SUBJECT: Pending Applications for Wireless Telecommunications Facility Permits at 1175 Palomar Oaks Drive

This letter concerns the County's processing of a proposed Use Permit (PLN 2005-00306) for a new Verizon wireless telecommunications facility (WTF) at the subject property. As you are aware, there are currently two (2) wireless telecommunications facilities at the subject property. Additionally, there are three (3) other pending applications for new or modified wireless telecommunications facilities at the property. The following table summarizes the existing wireless telecommunications facilities and pending applications for new or modified wireless telecommunications facilities at the subject property:

at V = 1 T =	Existing WTFs & Applications for New WTFs							
Facility No.								
o Margaretta	Existing WTF Site	s at the Prop	enty					
PLN 2000-00497 Sprint Existing Permit denied by the Board of Supervisors in 2010. Sprint's law against County is still pending.								
2	PLN 2001-00801	T-Mobile	Existing Facility	See below for status summary for pending application.				
	Subject Project - 1	Pending Appl	ication for the Pro	perty				
3 PLN 2005-00306 Verizon Pe		Pending Application for New Facility	Incomplete (subject of this letter)					
	Other Pending Ap	plications for	the Property					
(2)	PLN 2001-00801	T-Mobile	Pending Application for Modification to Existing Facility	Continued by Zoning Hearing Officer at a public hearing on April 1, 2010, where Applicant was required to provide a more fully complete application.  Required application materials have not been submitted.				

			& Applications fo 1175 Palomar Driv	
4	PLN 2005-00261	Metro PCS	Pending Application for New Facility	Applicant placed this application on hold in 2010 pending decision of Sprint lawsuit.
5	PLN 2010-00274	АТ&Т	Pending Application for New Facility	Deemed Incomplete in November 2010. Application remains incomplete.
			5	Potential Number of Facilities at Site

# Determination of Non-Exempt CEQA Status for Pending WTF Applications

As listed in Table 1 above, a decision on the Sprint case (affecting the status of the Sprint facility and potentially the Metro PCS application) and the determination of completeness by the County of three (3) other pending applications could potentially result in a total of five (5) wireless telecommunication facilities at the property.

The California Environmental Quality Act (CEQA) Guidelines establish criteria for a Lead Agency to determine the compliance of projects with CEQA. In some instances, a project may be determined by the Lead Agency to be exempt based on eligibility criteria outlined in categorical exemption classes. However, in other instances, projects which may otherwise be determined by the Lead Agency to be CEQA exempt when considered separately may be determined by the Lead Agency to be non-exempt per CEQA Section 15300.2 (Exceptions), due to the potential for significant cumulative impact(s) of successive projects of the same type in the same place, over time.

The County has determined that the pending application for a new Verizon wireless telecommunications facility does not meet the criteria for a CEQA exemption and requires the preparation of an Initial Study, per CEQA Section 15063, to study the potential for significant cumulative impact(s) of existing and proposed projects. Potential significant cumulative impact(s) may include, but are not limited to, radio frequency emissions and visual impacts. After the completion of an Initial Study, the County will require the preparation of a Negative Declaration or an Environmental Impact Report (EIR).

Based on the determination of the non-exempt CEQA status of this application, the application has been found to be incomplete. Progress cannot be made on this application until fees for the preparation of an Initial Study and required surcharges have been paid (see attached invoice for fees due).

Curtis and Ethel Brooks April 12, 2012 Page 3

Please feel free to contact me at 650/363-1855 if you have any questions.

Sincerely,

Steve Monowitz Deputy Director

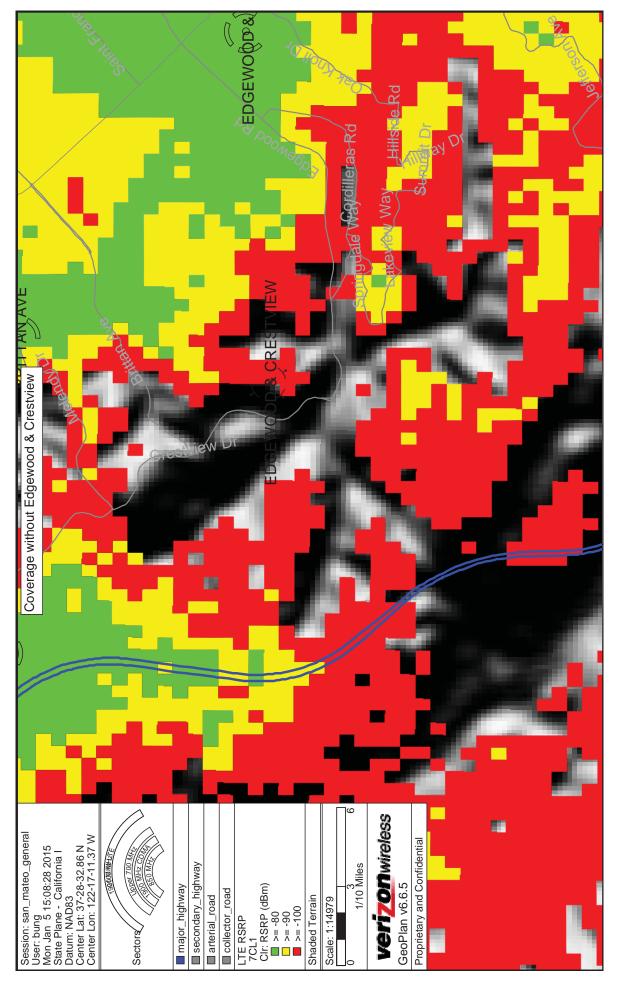
cc: Charnel James, Verizon

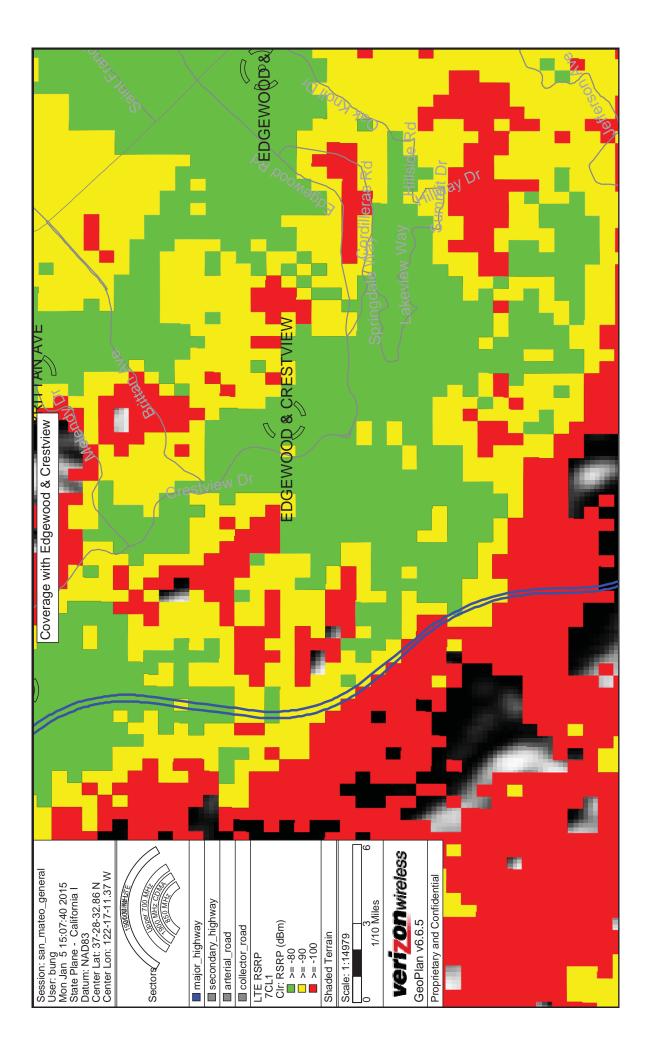
Jim Eggemeyer, Community Development Director

County Counsel's Office

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Enclosure





FOSTING ONLY

# COUNTY OF SAN MATEO, PLANNING AND BUILDING DEPARTMENT

BESZ DE LA VEGA

# NOTICE OF INTENT TO ADOPT MITIGATED NEGATIVE DECLARATION

JAN 21 2014

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et seq.), that the following project: <u>New Verizon and AT&T Wireless Telecommunication Facilities at the Brooks Residential Property</u>, when adopted and implemented, will not have a significant impact on the environment.

FILE NO.: PLN 2005-00306

OWNER: Ethel and Curtis Brooks

APPLICANTS:

Applicant for Verizon Facility	Applicant for AT&T Facility
Charnel James	Tom Johnson
NSA Wireless, Inc.	925/785-3727
2010 Crow Canyon Place, Suite 355	tjohnso3@Bechtel.com
San Ramon, CA 94583	
530/219-1833	

ASSESSOR'S PARCEL NO.: 051-416-040

LOCATION: 1175 Palomar Drive, unincorporated Palomar Park area of San Mateo County

## PROJECT DESCRIPTION

The project involves the addition of 2 new wireless telecommunication facilities (Verizon and AT&T) to an existing maintained infrastructure consisting of 2 wireless telecommunication facilities (Sprint and T-Mobile) located in the back yard of the single-family residential property. Project implementation would result in a total of 4 facilities at the site, including 8 antenna poles and approximately 940 sq. ft. of leased area for associated equipment. The project would result in minor land disturbance and grading associated with the installation of antenna poles and the construction of equipment pads for the lease areas associated with 2 new facilities. Based on the recommendations of an arborist, the Verizon applicant would remove 3 significant trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous Monterey pine trees) and 18 smaller trees. An additional 3 significant trees would be removed under the AT&T proposal.

# FINDINGS AND BASIS FOR A MITGATED NEGATIVE DECLARATION

The Current Planning Section has reviewed the initial study for the project and, based upon substantial evidence in the record, finds that:

1. The project, as mitigated, will not adversely affect water or air quality or increase noise levels substantially.

- 2. The project will not have adverse impacts on the flora or fauna of the area.
- 3. The project will not degrade the aesthetic quality of the area.
- 4. The project, as mitigated, will not have adverse impacts on traffic or land use.
- 5. In addition, the project, as mitigated, will not:
  - Create impacts which have the potential to degrade the quality of the environment.
  - b. Create impacts which achieve short-term to the disadvantage of long-term environmental goals.
  - Create impacts for a project which are individually limited, but cumulatively considerable.
  - d. Create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The County of San Mateo has, therefore, determined that the environmental impact of the project is less than significant.

MITIGATION MEASURES included in the project to avoid potentially significant effects:

<u>Mitigation Measure 1</u>: Prior to Planning's final approval of the building permit for any new or modified facilities, all new reflective surfaces shall be screened or painted such that surfaces are no longer reflective.

<u>Mitigation Measure 2</u>: As recommended by David L. Babby (Registered Consulting Arborist #399), in a report dated February 23, 2012, the applicant shall remove 18 trees that are less than 6" in diameter (including 17 dead, 1 damaged), and 3 trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous trees).

Mitigation Measure 3: For the protection of retained trees, the applicant shall comply with the Tree Protection Measures as outlined in the report prepared by David L. Babby (Registered Consulting Arborist #399), dated February 23, 2012. In addition, the applicant shall consult with Mr. Babby regarding additional measures to improve the health of existing trees (such as irrigation, fencing, trimming, fertilization, treatment, etc.) and demonstrate to County staff the implementation of additional recommendations. If any of the retained trees should die, the applicant shall replace the tree(s) as outlined in Mitigation Measure 4. Tree removals are subject to Design Review (DR) District Zoning Regulations and County permit requirements.

<u>Mitigation Measure 4</u>: The property owner shall comply with the following requirements regarding tree replacement:

a. For removal of trees that are 6 inches or more in diameter, these trees shall be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. For trees that are

less than 6" in diameter, trees shall be replaced using a minimum of 5-gallon size stock at a 1:1 ratio.

- b. For indigenous trees, trees shall be replaced using the same species. Exotic trees shall be replaced with an indigenous species.
- c. A surety deposit of \$4,000 for both performance (installation of tree, staking, and providing an irrigation system) and maintenance of planted trees is required prior to the Current Planning Section's approval of the building permit for this project. Maintenance shall be required for five years. Maintenance reports, as prepared by a certified arborist, shall be submitted to the Project Planner on an annual basis by April 30 after planting.
- d. During the maintenance period, the property owner at his/her expense shall replace any dead or dying tree(s). Under such circumstances, the maintenance period will be extended for a period of two (2) additional years.
- e. Release of the performance and maintenance surety shall only be allowed upon the satisfactory installation and maintenance and upon inspection by the County.

<u>Mitigation Measure 5</u>: All new tree plantings shall conform to recommendations for "future planting design" as outlined in the report.

<u>Mitigation Measure 6</u>: An archeologist shall be present on-site to observe all land disturbing activities. Should any cultural resource(s) be found, all work shall cease until an archeological or paleontological report (as applicable) is provided to Current Planning Section staff and all recommendations of the report are implemented to minimize damage to archeological and/or paleontological resources.

<u>Mitigation Measure 7</u>: The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.

<u>Mitigation Measure 8</u>: The construction or modification of antenna poles and associated equipment requires a building permit. Geotechnical review of each new or modified facility is required at the building permit stage. Each applicant shall demonstrate compliance with geotechnical recommendations in the design of each facility prior to the County's issuance of a building permit.

<u>Mitigation Measure 9</u>: Prior to the Current Planning Section's approval of the building permit required for each new facility or facility modification, each carrier shall submit an Erosion and Sediment Control Plan, where each plan shall include adequate stormwater pollution prevention measures, as determined by Planning staff. The Erosion and Sediment

Control Plan shall be implemented prior to land disturbance and throughout the construction process until all disturbed areas are stabilized or landscaped. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

<u>Mitigation Measure 10</u>: The applicant shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including, but not limited to, the following:

- a. Delineation with field markers of clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses within the vicinity of areas to be disturbed by construction and/or grading.
- Protection of adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
- c. Performing clearing and earth-moving activities only during dry weather.
- d. Stabilization of all denuded areas and maintenance of erosion control measures continuously between October 1 and April 30.
- e. Storage, handling, and disposal of construction materials and wastes properly, so as to prevent their contact with stormwater.
- f. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- g. Use of sediment controls or filtration to remove sediment when dewatering site and obtain all necessary permits.
- h. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilization of designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- I. Training and providing instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
- m. Additional Best Management Practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management

during construction activities. Any water leaving the site shall be clear and running slowly at all times.

n. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

<u>Mitigation Measure 11</u>: In order to bring the project into compliance with General Plan Policy 4.27 (*Ridgelines and Skylines*), each applicant for Verizon and AT&T shall demonstrate compliance with the following requirements. If the applicants plan to pursue plans at the subject property, each applicant shall amend project plans and visual simulations to demonstrate compliance with Items b and c, subject to review and approval by Planning staff, prior to the approval of a building permit for each proposal.

- a. Consider alternative building site(s) which are not on a ridgeline. Any new proposal would be subject to CEQA requirements.
- b. In order to comply with County General Plan Policy 4.27 regarding construction on a ridgeline in a forested area, which is part of a public view, the applicants shall use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) that would better conform the project to the ridgeline, forested environment; AND,
- c. Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11.b. in order to minimize scenic impact, unless doing so would directly result in a gap in service, in which case alternative means of reducing scenic impact shall be proposed and implemented, subject to the approval of the Community Development Director.

<u>Mitigation Measure 12</u>: Any new generator associated with this project shall comply with County Policy 58, such that equipment shall be located within the building envelope (a minimum of 10 feet from the side property lines and 20 feet from the front and rear property lines for the subject zoning district) or no closer than 3 ft. to a property line if the equipment is housed in a cabinet for the purpose of reducing noise impacts on neighboring properties. Each applicant shall demonstrate compliance with this requirement prior to the Current Planning Section's approval of a building permit for a new facility or facility modification.

## RESPONSIBLE AGENCY CONSULTATION

None

## INITIAL STUDY

The San Mateo County Current Planning Section has reviewed the Environmental Evaluation of this project and has found that the environmental impacts are potentially significant. A copy of the initial study/Mitigated Negative Declaration is attached.

REVIEW PERIOD: January 21, 2014 to February 10, 2014

All comments regarding the correctness, completeness, or adequacy of this Initial Study/Mitigated Negative Declaration must be received by the County Planning and Building Department, 455 County Center, Second Floor, Redwood City, no later than **5:00 p.m., February 10, 2014**.

# **CONTACT PERSON**

Camille Leung, Project Planner 650/363-1826 cleung@smcgov.org

Camille Leung, Project Planner

CML:jlh – CMLX0852\_WJH.DOC FRM00013(click).doc (1/11/07)

# County of San Mateo Planning and Building Department

## INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

## **ENVIRONMENTAL EVALUATION CHECKLIST**

(To Be Completed by Planning Department)

- 1. **Project Title:** New Verizon and AT&T Wireless Telecommunication Facilities at the Brooks residential property.
- 2. County File Number: PLN 2005-00306
- 3. **Lead Agency Name and Address:** Planning and Building Department, County of San Mateo, 2nd Floor, 455 County Center, Redwood City, CA 94063
- 4. **Contact Person and Phone Number:** Camille Leung, Planner, 650/363-1826
- 5. **Project Location:** 1175 Palomar Drive, unincorporated Palomar Park area of San Mateo County
- 6. Assessor's Parcel Number and Size of Parcel: 051-416-040 (25,155 sq. ft.)
- 7. Project Sponsor's Name and Address:

Applicant for Verizon Facility	Applicant for AT&T Facility
Charnel James NSA Wireless, Inc. 2010 Crow Canyon Place, Suite 355 San Ramon, CA 94583 530/219-1833	Tom Johnson 925/785-3727 tjohnso3@Bechtel.com

- 8. **General Plan Designation:** Low Density Residential (0.3 2.3 dwelling units/net acre).
- 9. **Zoning:** R-1/S-101/DR (Single-Family Residential District/20,000 sq. ft. minimum lot size/Design Review).
- 10. **Description of the Project:** The project involves the addition of 2 new wireless telecommunication facilities (Verizon and AT&T) to an existing maintained infrastructure consisting of 2 wireless telecommunication facilities (Sprint and T-Mobile) located in the back yard of the single-family residential property. Project implementation would result in a total of 4 facilities at the site, including 8 antenna poles and approximately 940 sq. ft. of leased area for associated equipment. The project would result in minor land disturbance and grading associated with the installation of antenna poles and the construction of equipment pads for

<sup>1</sup> Maintenance may involve some minor modifications that would be reviewed at an administrative level.

<sup>&</sup>lt;sup>2</sup> While the County considers each of the facilities as an individual "project," the projects have been combined into a singular project for the purposes of providing a cumulative analysis of the impacts resulting from the implementation of these proposals and the maintenance of existing facilities.

the lease areas associated with 2 new facilities. Based on the recommendations of an arborist, the Verizon applicant would remove 3 significant trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous Monterey pine trees) and 18 smaller trees. An additional 3 significant trees would be removed under the AT&T proposal. A summary of existing and proposed facilities is provided in Table 1 below:

Table 1 Existing and Proposed Facilities at 1175 Palomar Drive					
Case Number	Carrier	New or Existing Facility	Facility Description	Project Status	No. of Protected Trees to be Removed
PLN 2000- 00497	Sprint	Existing Facility	Two (2) existing 13' 6" ht. antenna poles each within a 16 sq. ft. lease area and a 270 sq. ft. equipment lease area.	Existing Facility; no pending applications.	0
PLN 2001- 00801	T-Mobile <sup>3</sup>	Existing Facility	Existing 15' ht. antenna pole. Proposed pole height increase to 16' 7" ht. with 211 sq. ft. equipment lease area.	Use permit recently renewed. Height increase approved (Administrative decision)	0
PLN 2005- 00306	Verizon	New Facility	Three (3) proposed 20' ht. antenna poles, two within a 16 sq. ft. lease area and one within a 263.19 sq. ft. equipment lease area.	Application is complete and public hearing is pending.	3
PLN 2010- 00274	AT&T	New Facility	Two (2) proposed 15' ht. antenna poles each within a 16 sq. ft. lease area and a proposed 96 sq. ft. equipment lease area. 4	Application is incomplete; public hearing has not been scheduled.	3
	TOTALS: 4 Facilities 8 Poles and approx. 936.19 sq. ft. of Lease Space				

**Note:** Existing facilities are shaded; New facilities are shown unshaded. Each facility description represents the facility as it existed or was proposed at the time of the preparation of this document.

11. **Surrounding Land Uses and Setting:** This parcel is level and improved with one single-family residence and existing Sprint and T-Mobile wireless telecommunications facilities. The existing wireless telecommunications facilities are located in the rear yard of the property.

<sup>3</sup> Metro PCS also has a pending application for a new facility at this site. In Spring 2013, Metro PCS merged with T-Mobile to form "T-Mobile US." As a T-Mobile facility already exists at this site and due to inactivity of the Metro PCS application, it is assumed that the Metro PCS project is no longer needed and, therefore, the project is not analyzed in this document. T-Mobile has been contacted by Staff to confirm this assumption.

2

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At the time of the preparation of this document, the status of this project has not been confirmed.

<sup>4</sup> Project plans for the AT&T site show two (2) antennas and a lease area of 96 sq. ft. The AT&T site shown in plans prepared by Verizon show an earlier version of the AT&T project which included only one (1) antenna pole and a 265 sq. ft. lease space.

The northwest portion of the rear yard contains a portion of the Sprint facility (includes one 13' 6" ht. Sprint antenna pole within a 16 sq. ft. Sprint lease area and a 270 sq. ft. Sprint equipment enclosure area) and a T-Mobile facility (includes one 15' ht. T-Mobile antenna pole located within a 211 sq. ft. equipment enclosure area). The southwest portion of the rear yard contains a second Sprint antenna pole (13' 6" ht. Sprint antenna pole within a 16 sq. ft. Sprint lease area). The rear yard contains several trees, shrubs and various landscaping.

12. Other Public Agencies Whose Approval is Required: None.

## **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Significant Unless Mitigated" as indicated by the checklist on the following pages.

Х	Aesthetics		Climate Change		Population/Housing
	Agricultural and Forest Resources		Hazards and Hazardous Materials		Public Services
	Air Quality	Х	Hydrology/Water Quality		Recreation
Х	Biological Resources	Х	Land Use/Planning		Transportation/Traffic
Х	Cultural Resources		Mineral Resources		Utilities/Service Systems
Х	Geology/Soils	Х	Noise	Х	Mandatory Findings of Significance

## **EVALUATION OF ENVIRONMENTAL IMPACTS**

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures,

- and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in 5. below, may be cross-referenced).
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources. Sources used or individuals contacted should be cited in the discussion.

1.	AESTHETICS. Would the project:					
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact	
1.a.	Have a significant adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?		Х			

**Discussion:** Visual simulations for each proposal show the visual impact of each carrier's proposal (Attachments G and I). The County was not provided a visual simulation representing the project at its full scope (8 antenna poles). Viewing locations represented in the visual simulations include locations along Crestview Drive (a residential street), Edmonds Drive (a residential street), and Edgewood Drive (a County General Plan designated arterial highway and "scenic route"). It should be noted that Station 4 of the Verizon visual simulations represents a viewing location on Edgewood Road between 2 public recreation areas, Pulgas Ridge Open Space Area and Edgewood County Park.

Due to the scope of the project, which involves the maintenance of 3 existing antenna poles and the construction of 5 additional antenna poles, the project would be visible from residential areas, public lands, and roads, and may result in a significant adverse effect on views from those viewing locations.

Each carrier's proposal involves tree removal and planting for facility screening and replacement of removed trees. As discussed in Section 4.e., below, Verizon's proposal involves the removal of 3 trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous Monterey pine trees), which will reduce project screening. It should be noted that of the 21 remaining trees, 7 other mature trees (including 5 Monterey pines, 1 coast live oak, and 1 coast redwood) are all in "Poor" condition and, despite best efforts, could die, reducing screening of the project.

According to the Environmental Information Form submitted for the proposal, the AT&T proposal involves the removal of 3 trees that are 6" or more in diameter.

Proposed tree removals would increase the visibility of the project from residential areas, public lands, and roads. Mitigation Measures 2 through 5 in Section 4.e. require the replacement of trees removed and the implementation of protection and maintenance measures for new and retained trees. Additionally, Mitigation Measure 11 in Section 10.b., which requires the applicants to seek out alternative non-ridgeline site(s) or conform the project to the ridgeline environment, would reduce the project's significant adverse effect on views from residential areas, public lands, and roads.

No additional mitigation measures are required.

**Source:** Project Visual Simulations (Attachments G and I); County Map.

1.b.	Significantly damage or destroy scenic resources, including, but not limited to,		Χ	
	trees, rock outcroppings, and historic buildings within a state scenic highway?			
	buildings within a state scenic highway?			

**Discussion:** Project implementation would result in a total of 4 facilities at the site, including 8 antenna poles and approximately 940 sq. ft. of leased area for associated equipment. Project implementation would result in the removal of trees, but these trees are not located within a state scenic highway. There are no rock outcroppings in the project footprint. The single-family residence at the property was built in 1968, is not historic, and would not be altered. The property site is not located within a state scenic highway.

Source: Project Plans; Site Observation.

1.c. Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface relief features, and/or development on a ridgeline?	X		
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**Discussion:** The project will result in development on a ridgeline that would degrade the existing visual character or quality of the site and its surroundings. See discussion and necessary mitigation in Sections 1.a. and 10.b.

**Source:** Project Visual Simulations; County General Plan.

1.d.	Create a new source of significant light	X	
	or glare that would adversely affect day		
	or nighttime views in the area?		

**Discussion:** While no new light sources are proposed, antennas and associated equipment would be made of metal and could potentially provide new sources of glare if materials are reflective. Mitigation Measure 1 requires reflective surfaces to be screened or painted such that surfaces would not be reflective.

<u>Mitigation Measure 1</u>: Prior to Planning's final approval of the building permit for any new or modified facilities, all new reflective surfaces shall be screened or painted such that surfaces are no longer reflective.

**Source:** Project Plans.

	1.e.	Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?		Х			
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**Discussion:** The project site is not located within the Interstate 280 Scenic Corridor. However, the project would be visible from Edgewood Road, a County-designated "scenic route." For discussion of project impacts to Edgewood Road and necessary mitigation, see Sections 1.a., above, and 10.b., below.

**Source:** Project Visual Simulations; County General Plan.

1.f. If within a Design Review District, confl	lict	X		
with applicable General Plan or Zoning	1			
Ordinance provisions?				

**Discussion:** While the project site is located in a Design Review (DR) Zoning District, the project is not subject to these regulations. The project is subject to the Wireless Telecommunication Regulations (Section 6510 of the Zoning Regulations). For the purposes of CEQA, the proposal is in substantial conformance with Section 6510. However, as stated in Section 10.b. of this document, the project conflicts with County General Plan Policy 4.27 which relates to ridgelines and skylines. For further discussion and necessary mitigation, see Section 10.b., below.

**Source:** Design Review (DR) Zoning District Regulations; Wireless Telecommunication Facilities Regulations.

1.g. Visually intrude into an area having natural scenic qualities?	Х	

**Discussion:** The project, which would result in a total of 8 antenna poles at the subject property, would be located on a ridgeline and would be visible from Edgewood Road, a County-designated "scenic route," also called a "scenic road." General Plan Policy 4.42 establishes criteria for scenic road designation for urban areas, calling for the selection of roads which display attractive urban development (i.e., State and County historical sites, singular and multiple structures of architectural interest, engineering constructs, and other archaeological, historical, or cultural sites), and provide views of natural scenery in an urban setting. In its designation as a scenic route, the segment of Edgewood Road from Alameda de las Pulgas to Canada Road was found to embody these qualities, specifically offering views of natural scenery in an urban setting. Please see discussion and necessary mitigation in Sections 1.a., above, and 10.b., below.

Source: Project Visual Simulations; County General Plan.

2.	AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact	
2.a.	For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X	
resider result i	ssion: The subject property is zoned for since. The property does not contain any agrin conversion of farmland to a non-agriculture: County Zoning Map.	icultural uses			ould not	
2.b.	Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?				Х	
resider result i Open S	<b>Discussion:</b> The subject property is zoned for single-family residential use and contains a residence. The property does not contain any agricultural uses and, therefore, the project would not result in conversion of farmland to a non-agricultural use. The property is not subject to an existing Open Space Easement or a Williamson Act contract. <b>Source:</b> County Zoning Map.					
2.c.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?				X	

**Discussion:** The wireless telecommunication proposals which are the subject of this document would not involve or influence the conversion of farmland to non-agricultural use or conversion of forestland to non-forest use, nor is the project located near forestland or farmland.

Source: County Zoning Map.

2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				X		
<b>Discussion:</b> The project is not located in the Coa	ıstal Zone.					
Source: County Local Coastal Program.						
2.e. Result in damage to soil capability or loss of agricultural land?				Х		
<b>Discussion:</b> The subject property is zoned for single-family residential use and contains a residence. The property does not contain any agricultural uses and, therefore, the project would not damage soil capability nor loss of agricultural land. <b>Source:</b> County Zoning Map; Project Plans.						
2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?  Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.				Х		

**Discussion:** The subject property is zoned for single-family residential use and contains a residence. The wireless telecommunications proposals which are the subject of this document are allowed under certain circumstances within residential zoning districts. The project would not involve or influence the rezoning of forestland, timberland, or timberland zoned Timberland Production.

Source: Wireless Telecommunication Facilities Regulations; County Zoning Map.

**3. AIR QUALITY**. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
3.a.	Conflict with or obstruct implementation of the applicable air quality plan?				Х

**Discussion:** The project involves the construction and operation of wireless telecommunication facilities. The Bay Area Air Quality Management District (BAAQMD) exempts the construction of a

do not conflic	ng or structure that is not itself a source require a permit from BAAQMD for their oper with or obstruct implementation of the appore. Regulation 2, Permits, Rule 1, General Formation 2.	eration and, the licable air qua	nerefore, the p lity plan.				
3.b.	Violate any air quality standard or contribute significantly to an existing or projected air quality violation?				X		
Discu	ssion: See discussion in Section 3.a., above	/e.					
Sourc	e: Regulation 2, Permits, Rule 1, General F	Requirements,	BAAQMD.				
3.c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				X		
Discu	ssion: See discussion in Section 3.a., above	/e.					
Sourc	e: Regulation 2, Permits, Rule 1, General F	Requirements,	BAAQMD.				
3.d.	Expose sensitive receptors to significant pollutant concentrations, as defined by BAAQMD?				X		
Discu	ssion: See discussion in Section 3.a., above	/e.					
Sourc	e: Regulation 2, Permits, Rule 1, General F	Requirements,	BAAQMD.				
3.e.	Create objectionable odors affecting a significant number of people?			Х			
projec numbe neight	ssion: While project construction may creat would not result in any permanent odors, rear of people, as the project is located on privoorhood.  Pe: Project Plans.	or would temp	oorary odors a	ffect a significa	ant		
3.f.	Generate pollutants (hydrocarbon,			Х			
O	thermal odor, dust or smoke particulates, radiation, etc.) that will violate existing standards of air quality on-site or in the surrounding area?			χ			
particu constr	<b>Discussion:</b> While project construction may generate pollutants (such as dust and smoke particulates) on a temporary basis, the project would not generate air pollutants after project construction. Pollutants generated during construction would not violate existing standards of air quality, as the BAAQMD exempts the construction of a building or structure that is not itself a source						

requiring a permit (Regulation 2-1-113). Therefore, project impacts related to air pollutant generation would be considered less than significant.

Source: Project Plans.

Source: CNDDB Database.

4.	BIOLOGICAL RESOURCES. Would the	oroject:				
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact	
4.a.	Have a significant adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X	
<b>Discussion:</b> Planning staff performed a search of the California Natural Diversity Database (CNDDB) for special-status plants and wildlife species in the area. As shown in Attachment D, no special-status plants and wildlife species exist in the project vicinity. In addition, the property has been occupied by residential uses since 1968, where the area to be disturbed is within the backyard of the subject property. The site does not contain nor is it adjacent to any riparian or wetland areas. <b>Source:</b> CNDDB Database.						
4.b.	Have a significant adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				Х	
	ission: See discussion in Section 4.a., abov	/e.				
Sourc	ce: CNDDB Database.					
4.c.	Have a significant adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X	
Discu	ssion: See discussion in Section 4.a., abov	/e.				

4.d.	Interfere significantly with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?				Х	
Discussion: See discussion in Section 4.a., above.  Source: CNDDB Database.						
4.e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?		Х			

**Discussion:** The applicant arranged for an arborist, David L. Babby (Registered Consulting Arborist #399), to assess the health of the trees on-site. In a report, dated February 23, 2012 (included as Attachment G), Mr. Babby states that there are 21 trees meeting the County's definition of a significant tree (any tree that is 6" or more in diameter per the Design Review (DR) District Zoning Regulations) at the property and 21 trees that are less than 6" in diameter at the property (it is likely that these trees were planted as screening to mitigate the visual impacts of the 2 existing facilities). Based on the recommendations of this report, the Verizon applicant intends to remove 18 trees that are less than 6" in diameter (including 17 dead, 1 damaged) and 3 significant trees (including 1 fallen tree and 2 hazardous Monterey pine trees) and retain the other 21 trees. Per the DR District Regulations, significant trees shall be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. The AT&T proposal includes the removal of 3 additional significant trees.

Mitigation Measure 2 has been added in order to require the property owner to remove dead, damaged and hazardous trees per the arborist's recommendations. Mitigation Measure 3 requires the protection of retained trees per the arborist's recommendations and their replacement, in the event of disease or death. Of the 21 remaining trees, 7 other mature trees (including 5 Monterey pines, 1 coast live oak, and 1 coast redwood) are all in "Poor" condition and could die, reducing screening of the project.

	Table 2  Trees to be Removed and Replaced at 1175 Palomar Drive						
Carrier	Significant Trees (6" dbh or larger)	Non-Significant Trees (less than 6" dbh)	Required Number of Replacement Trees (3:1 for significant and 1:1 for non-significant trees)				
Verizon	3	18	27				
AT&T	3	None	9				
TOTAL	6	18	36				
Sources: Design Review District Regulations; Arborist Report for Verizon; AT&T Proposal.							

Mitigation Measure 4 requires the property owner to replace removed significant trees using a 3:1 ratio and removed non-significant trees using a 1:1 ratio (replaced trees: removed tree). If and when all of the proposed tree removals occur, the planting of 36, 5-gallon trees would be required. Planning staff may authorize the planting of a larger tree in-lieu of planting several smaller replacement trees (e.g., one (1) 24' box in-lieu of five (5) 5-gallon trees). Due to the failed

maintenance of newly planted trees in the past, the mitigation measure requires the payment of a maintenance surety deposit to the County. Mitigation Measure 5 requires the property owner to maintain new tree plantings according to the arborist's recommendations.

<u>Mitigation Measure 2</u>: As recommended by David L. Babby (Registered Consulting Arborist #399), in a report dated February 23, 2012, the applicant shall remove 18 trees that are less than 6" in diameter (including 17 dead, 1 damaged), and 3 trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous trees).

Mitigation Measure 3: For the protection of retained trees, the applicant shall comply with the Tree Protection Measures as outlined in the report prepared by David L. Babby (Registered Consulting Arborist #399), dated February 23, 2012. In addition, the applicant shall consult with Mr. Babby regarding additional measures to improve the health of existing trees (such as irrigation, fencing, trimming, fertilization, treatment, etc.) and demonstrate to County staff the implementation of additional recommendations. If any of the retained trees should die, the applicant shall replace the tree(s) as outlined in Mitigation Measure 4. Tree removals are subject to Design Review (DR) District Zoning Regulations and County permit requirements.

<u>Mitigation Measure 4</u>: The property owner shall comply with the following requirements regarding tree replacement:

- a. For removal of trees that are 6 inches or more in diameter, these trees shall be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. For trees that are less than 6" in diameter, trees shall be replaced using a minimum of 5-gallon size stock at a 1:1 ratio.
- b. For indigenous trees, trees shall be replaced using the same species. Exotic trees shall be replaced with an indigenous species.
- c. A surety deposit of \$4,000 for both performance (installation of tree, staking, and providing an irrigation system) and maintenance of planted trees is required prior to the Current Planning Section's approval of the building permit for this project. Maintenance shall be required for five years. Maintenance reports, as prepared by a certified arborist, shall be submitted to the Project Planner on an annual basis by April 30 after planting.
- d. During the maintenance period, the property owner at his/her expense shall replace any dead or dying tree(s). Under such circumstances, the maintenance period will be extended for a period of two (2) additional years.
- e. Release of the performance and maintenance surety shall only be allowed upon the satisfactory installation and maintenance and upon inspection by the County.

<u>Mitigation Measure 5</u>: All new tree plantings shall conform to recommendations for "future planting design" as outlined in the report.

**Source:** Design Review (DR) District Zoning Regulations; Arborist Report by David L. Babby dated February 23, 2012.

4.f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or State habitat conservation plan?		Х
	conservation plan:		

**Discussion:** The property is zoned for residential development and is not located in an area subject to a Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. For further discussion, see Section 4.a., above.

Source: CNDDB Database.								
4.g.	Be located inside or within 200 feet of a marine or wildlife reserve?				Х			
<b>Discussion:</b> The property is zoned for residential development and is not located inside or within 200 feet of a marine or wildlife reserve. For further discussion, see Section 4.a., above.								
Source: Site Visit; CNDDB Database.								
4.h.	Result in loss of oak woodlands or other non-timber woodlands?			Х				

**Discussion:** There are oak trees located in the project area of the residential property. Four (4) 5-gallon coast live oak trees would be removed as they are dead or significantly damaged. Due to the condition of the trees and their small size, their removal will not result in a significant loss to oak woodlands. Another 37" d.b.h. coast live oak has fallen and would be removed and would also not result in a significant loss to oak woodlands. Please see discussion in Section 4.e. regarding required replacement of these trees. No additional mitigation measures are necessary.

Source: Arborist Report by David L. Babby, dated February 23, 2012.

5.	CULTURAL RESOURCES. Would the project:						
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact		
5.a.	Cause a significant adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?		X				

**Discussion:** The project was reviewed by the California Historical Resources Information System (CHRIS). In a letter dated February 18, 2013, Mark Castro on behalf of Leigh Jordan, Coordinator, stated that, while CHRIS did not have any record of any previous cultural resource studies for the proposed project area, the project area has the possibility of containing unrecorded archeological site(s). CHRIS recommends the preparation of a study prior to commencement of project activities and that the applicant contact Native American tribe(s) regarding traditional, cultural, and religious heritage values. Planning staff worked with the Verizon applicant to address this recommendation and found that, by requiring an archeologist to be present on-site to observe all land disturbing activities and to make recommendations as necessary, any potential impact(s) to archeological and/or paleontological resources would be adequately mitigated.

<u>Mitigation Measure 6</u>: An archeologist shall be present on-site to observe all land disturbing activities. Should any cultural resource(s) be found, all work shall cease until an archeological or paleontological report (as applicable) is provided to Current Planning Section staff and all recommendations of the report are implemented to minimize damage to archeological and/or paleontological resources.

**Source:** Letter dated February 18, 2013 from CHRIS; Email Correspondence with Verizon Applicant dated October 30, 2013.

5.b.	Cause a significant adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?		Х				
Discu	<b>Discussion:</b> See discussion in Section 5.a., above.						
	<b>Source:</b> Letter dated February 18, 2013 from CHRIS; Email Correspondence with Verizon Applicant dated October 30, 2013.						
5.c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		Х				
Discu	Discussion: See discussion in Section 5.a., above.						
<b>Source:</b> Letter dated February 18, 2013 from CHRIS; Email Correspondence with Verizon Applicant dated October 30, 2013.							
5.d.	Disturb any human remains, including those interred outside of formal cemeteries?		X				

**Discussion:** As the project involves minor land disturbance and grading associated with the installation of antenna poles and the construction of equipment pads for the lease areas associated with 2 new facilities, the project has the potential to disturb interred human remains, including those interred outside of formal cemeteries. Mitigation Measure 7, below, requires the property owner, applicant, and contractors to comply with the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. The implementation of this mitigation measure would mitigate any potential impact to interred human remains to a less than significant level.

Mitigation Measure 7: The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.

Source: California State Law.

6.	GEOLOGY AND SOILS. Would the proje	ct:			
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
6.a.	Expose people or structures to potential significant adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault?		X		
	Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.				
proje mont anter maint const adde buildi geote	ct involves the construction of an additional 2 thly maintenance visits. However, while the rinna poles, a geologic-related failure of any of tenance workers and residential occupants of truction of the proposed poles and associated a mitigation measure to require geotechnicing permit stage. Each applicant would be reechnical recommendations in the design of each permit.	defacilities. All isk is low, due the poles may n and/or surrod equipment real review of all quired to dem	facilities would to the height of pose a safety unding the pro equires a build I new and/or monstrate comp	d be unmanne of the propose of the p	d, with ed / aff has es at the
equip requi geote	ation Measure 8: The construction or modifument requires a building permit. Geotechnic red at the building permit stage. Each application application of the design of each permit.	al review of ea ant shall demo	ach new or mo	odified facility i liance with	
Sour	ce: Consultation with the County Planning a	nd Building De	epartment's G	eotechnical Se	ection.
	ii. Strong seismic ground shaking?		Х		
	ussion: See discussion in Section 6.a.i., abo		epartment's G	eotechnical S	ection.
	iii. Seismic-related ground failure, including liquefaction and differential settling?		Х		

Discussion: See discussion in Section 6.a.i., abo	ove.				
Source: Consultation with the County Planning and Building Department's Geotechnical Section.					
iv. Landslides?	X				
<b>Discussion:</b> See discussion in Section 6.a.i., above. <b>Source:</b> Consultation with the County Planning and Building Department's Geotechnical Section.					
v. Coastal cliff/bluff instability or erosion?		Х			
Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).					
Discussion: The site is not located within proximity of a coastal cliff or bluff.					
Source: Site Map.					
6.b. Result in significant soil erosion or the loss of topsoil?	Х				

**Discussion:** The project would result in minor land disturbance and grading associated with the installation of antenna poles and the construction of equipment pads for the lease areas associated with 2 new facilities. The building site is located on a ridge. While the building site is relatively flat, the topography drops steadily to the west. Should there be any precipitation during project grading or construction, there is the potential for sedimentation in on-site areas downslope from the project area. Mitigation Measure 9 requires each carrier to submit an Erosion and Sediment Control Plan for each new facility or facility modification, where each plan includes stormwater pollution prevention measures. Mitigation Measure 10 requires compliance with the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines."

<u>Mitigation Measure 9</u>: Prior to the Current Planning Section's approval of the building permit required for each new facility or facility modification, each carrier shall submit an Erosion and Sediment Control Plan, where each plan shall include adequate stormwater pollution prevention measures, as determined by Planning staff. The Erosion and Sediment Control Plan shall be implemented prior to land disturbance and throughout the construction process until all disturbed areas are stabilized or landscaped. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

<u>Mitigation Measure 10</u>: The applicant shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including, but not limited to, the following:

- a. Delineation with field markers of clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses within the vicinity of areas to be disturbed by construction and/or grading.
- b. Protection of adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
- c. Performing clearing and earth-moving activities only during dry weather.

- d. Stabilization of all denuded areas and maintenance of erosion control measures continuously between October 1 and April 30.
- e. Storage, handling, and disposal of construction materials and wastes properly, so as to prevent their contact with stormwater.
- f. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- g. Use of sediment controls or filtration to remove sediment when dewatering site and obtain all necessary permits.
- h. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilization of designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- I. Training and providing instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
- m. Additional Best Management Practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.
- n. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

**Source:** Project Plans; NPDES Requirements; SMCWPPP Resources.

6.c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?	X					
	Discussion: See discussion in Section 6.a.i., above.  Source: Consultation with the County Planning and Building Department's Geotechnical Section.						
6.d.	Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?	X					
			•	•			

**Discussion:** See discussion in Section 6.a.i., above.

Source: Consultation with the County Planning and Building Department's Geotechnical Section.

6.e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?		X	
	disposal of wastewater?			

**Discussion:** The project would not generate any wastewater. However, new facilities have the potential to impact an existing septic field at the property. The County's Environmental Health Division has reviewed and approved the project. The project would not have an impact on septic tanks or alternative wastewater disposal systems.

**Source:** Correspondence with Staff at the County's Environmental Health Division from February to September 2013.

7.	CLIMATE CHANGE. Would the project:				
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
7.a.	Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?			Х	

**Discussion:** The Verizon facility consists of three new antenna poles and associated equipment, including an emergency generator. The Verizon applicant states that the proposed facility would use approximately 8.8 kWh of electricity a month. The generator would consume approximately 0.92 gallons per hour (gph) of fuel a month at 25% load on standby and approximately 2.74 gph of fuel a month at 100% load on standby (under a complete power outage).

In order to estimate electricity and gas usage for the entire project, Staff multiplied the estimated demand levels for the Verizon project by 4 for the 4 facilities that would result at full project implementation. This is likely a conservative approach as the Verizon application includes 3 antenna poles while other applications involve 3 or fewer poles. Based on the foregoing, estimated project demand levels at full project implementation would be as shown below:

- Electricity: Approximately 35.2 kWh of electricity a month.
- Fuel: Approximately 3.68 gallons per hour (gph) of fuel a month at 25% load on standby and approximately 10.96 gph of fuel a month at 100% load on standby (complete power outage).

According to the U.S. Energy Information Administration, the average monthly residential electricity consumption in California is 573 kWh.<sup>5</sup> Assuming that the residence uses 573 kWh, an additional 35.2 kWh of electricity usage a month would represent a 6.1% increase in electricity consumption at the property.

As discussed in Section 16 of this report, the project would also result in additional traffic trips from current residential trips and trips associated with the maintenance of 2 existing facilities at the site.

<sup>&</sup>lt;sup>5</sup> U.S. Energy Information Administration Website: http://www.eia.gov/electricity/sales\_revenue\_price/pdf/table5\_a.pdf

The Verizon applicant estimates that maintenance crews would visit the site monthly. Estimating 2 trips a month (to and from the site) for each of the 2 new facilities results in 4 additional trips a month which is a negligible increase.

Project-related minor grading and facility construction will result in the temporary generation of GHG emissions along travel routes and at the project site. In general, construction involves GHG emissions mainly from exhaust from vehicle trips (e.g., construction vehicles and personal cars of construction workers). Due to the site's urban location and assuming construction vehicles and workers are based in urban areas, potential project GHG emission levels from construction would be considered minimal. The Verizon proposal, as proposed and mitigated, would also result in the removal of 21 trees for landscape maintenance purposes and another 3 trees to accommodate the proposed AT&T facility, but all removed trees will be replaced in accordance with Mitigation Measures 4 and 5.

To ensure new development projects are compliant with the County's Energy Efficiency Climate Action Plan (EECAP), the County provides the EECAP Development Checklist. Planning staff has reviewed the proposal with the criteria of the checklist and found that there are no criteria that are applicable for the project. Therefore, the project is considered in conformance with the EECAP and no mitigation measures are required.

**Source:** Email correspondence with Verizon Applicant, dated February 20, 2013 and November 6, 2013; Project plans; San Mateo County Energy Efficiency Climate Action Plan (EECAP); Bay Area Air Quality Management District, California Environmental Quality Act, Air Quality Guidelines, Updated May 2011; U.S. Energy Information Administration, "2012 Average Monthly Bill - Residential."

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7.b.	Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				Х		
Clima	Discussion: See discussion of project compliance with the San Mateo County Energy Efficiency Climate Action Plan (EECAP) in Section 7.a., above.  Source: Project Plans; San Mateo County Energy Efficiency Climate Action Plan (EECAP).						
7.c.	Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				Х		
<b>Discussion:</b> While the project would result in the removal and replacement of 3 significant trees and several smaller trees, the property is residential in use and not forestland. Therefore, the project would not result in the loss of forestland or conversion of forestland to non-forest use. <b>Source:</b> County Zoning Maps.							
7.d.	Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				Х		

<b>Discussion:</b> The site is not located within proximity to a coastal cliff or bluff. <b>Source:</b> Site Map.					
7.e.	Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				Х
	ussion: The site is not located within proxim	nity to the ocea	n or bay.		
7.f.	Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				Х
<b>Discussion:</b> The site is located on a hilltop in Zone X and is not located in a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.					
	Source: FEMA Flood Insurance Rate Map, Panel No.06081C0282E, Effective October 16, 2012.				
7.g.	Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
Discussion: See discussion in Section 7.f., above.					

8. HAZARDS AND HAZARDOUS MATERIALS. Woul	uld the project:
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	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
8.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?				X

Source: FEMA Flood Insurance Rate Map, Panel No.06081C0282E, Effective October 16, 2012.

**Discussion:** The project would not result in a significant hazard to the public or the environment, as it does not involve the routine transport, use, or disposal of hazardous materials.

Source: Project Plans.

8.b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
it doe	ussion: The project would not result in a sig s not involve the storage or release of hazar			or the environ	ment, as
Sourc	ce: Project Plans.				
8.c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
evaluation of the proposed project for compliance with applicable guidelines limiting human exposure to radio frequency ("RF") electromagnetic fields, with the results described in a letter dated January 28, 2013 (Attachment C). The evaluation includes the proposed Verizon wireless telecommunications facility, existing facilities at the site, and proposed facilities for AT&T and Metro PCS. In the letter, Mr. Hammett states that the proposed operation will, together with the existing and proposed base stations at the site, comply with FCC guidelines limiting public exposure to RF Energy. Specifically, Mr. Hammett states that the Verizon antennas, due to their mounting location, would not be accessible to the general public and, therefore, no mitigation measures are necessary to comply with the FCC public exposure guidelines. For additional details, please see Attachment C.  Source: Report from William Hammett of Hammet & Edison, Inc., Consulting Engineers, dated					
8.d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				Х
<b>Discussion:</b> The site is residential and is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.					
<b>Source:</b> Hazardous Waste and Substances Site List, California State Department of Toxic Substances Control, San Mateo County.					

<sup>6</sup> Due to T-Mobile's merger with Metro PCS, the existing T-Mobile facility on-site, and inactivity of the Metro PCS application, the proposed Metro PCS facility is assumed to be redundant and analysis of the facility is not included in this document. The proposed Metro PCS facility was included in the Hammet & Edison, Inc., report which represents a conservative approach.

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8.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?				Х			
a publi	<b>Discussion:</b> The site is not located within an airport land use plan nor is it located within 2 miles of a public airport or public use airport. <b>Source:</b> Vicinity Map.							
8.f.	For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?				Х			
<b>Discussion:</b> The project site is located on a hilltop in a residential neighborhood. The tallest antenna would be 20 ft. in height in an area where trees and antennas of comparable height already exist. Therefore, should the project be located within the vicinity of a private airstrip, it would not result in a significant safety hazard for people residing or working in the project area. <b>Source:</b> Site Observation; Project Plans.								
8.g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			Х				
<b>Discussion:</b> The project would not impede road access and would improve telecommunication capabilities in the area. The County Fire Authority has reviewed and approved the project subject to compliance with its permit requirements. <b>Source:</b> Consultation with County Fire Authority Staff, dated February 26, 2013.								
8.h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X				
Discussion: See discussion in Section 8.g., above.  Source: Consultation with County Fire Authority Staff, dated February 26, 2013.								
8.i.	Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				Х			

**Discussion:** The site is located on a hilltop in Zone X and is not located in a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Source: FEMA Flood Insurance Rate Map, Panel No.06081C0282E, Effective October 16, 2012. Χ 8.j. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows? **Discussion:** See discussion in Section 8.i., above. Source: FEMA Flood Insurance Rate Map. Panel No.06081C0282E. Effective October 16, 2012. 8.k. Expose people or structures to a signifi-Χ cant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? **Discussion:** See discussion in Section 8.i., above. Source: FEMA Flood Insurance Rate Map, Panel No.06081C0282E, Effective October 16, 2012. Χ 8.I. Inundation by seiche, tsunami, or mudflow? **Discussion:** The project site is not located in close proximity to any ocean, bay or lake. **Source:** Vicinity Map.

9.	HYDROLOGY AND WATER QUALITY.	Would the project:

		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
9.a.	Violate any water quality standards or waste discharge requirements (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?		X		

**Discussion:** The project involves a minor amount of grading and land disturbance and could generate pollutants (i.e., sediment, construction materials) during grading and construction. Mitigation Measures 9 and 10, as discussed in Section 6.b., would minimize the generation of pollutants associated with this project. No additional mitigation measures are required.

Source: Project Plans.

9.b. Significantly deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
<b>Discussion:</b> The project would not create additio recharge. <b>Source:</b> Project Plans.	nal water dem	and nor interf	ere with groun	d water
9.c. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in significant erosion or siltation on- or off-site?			X	
<b>Discussion:</b> The project would result in approximassociated with the construction of 2 new facilities the lease areas and approximately 800 sq. ft. for the may not be paved and is included to provide a confimpervious surface would not significantly alter drastage, each facility would be required to demonstrate The policy requires that, among other requirement less than or equal to the pre-development peak flow development can cross property lines. The project therefore, would not alter the course of a stream of <b>Source:</b> County's Drainage Policy; Project Plans.	at the site, inche 5-ft. wide for servative estimate at the sate compliance its, post-development is not located or river.	cluding approximate). An additional accessite. Also, at the with the Couppment peak fly and no additional accessions.	kimately 600 sets (the path maditional 1,400 sets building per unty's Drainage low and velocitional run-off cate	q. ft. for ay or sq. ft. of rmit e Policy. ty be
9.d. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or significantly increase the rate or amount of surface runoff in a manner that would result in flooding onor off-site?				Х
<b>Discussion:</b> See discussion in Section 9.c., above	/e.			
Source: County's Drainage Policy; Project Plans.				

9.e.	Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide significant additional sources of polluted runoff?			Х
	ussion: See discussion in Section 9.c., abovee: County's Drainage Policy; Project Plans			
9.f.	Significantly degrade surface or groundwater water quality?	Х		
	ussion: See discussion in Section 6.b., above: Project Plans; NPDES Requirements; S	sources.	I	
9.g.	Result in increased impervious surfaces and associated increased runoff?		X	
	ussion: See discussion in Section 9.c., abovee: County's Drainage Policy; Project Plans			

10.	LAND USE AND PLANNING. Would the	project:			
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
10.a.	Physically divide an established community?				Х
proper imped divided	ssion: The project is located on a hilltop, wity. The location of new antenna poles and a e access through the community, such that d.  e: Project Plans.	associated eq	uipment at the	property wou	ld not
10.b.	Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?		X		
range	<b>ssion:</b> County General Plan Policy 4.27 ( <i>R</i> of vision from a public road or other public fances and skylines, when seen as part of a pu	acility. The po	olicy discourac	es structures	on open

Structures on open ridgelines and skylines are only allowed as part of a public view when no alternative building site exists. The policy requires structures on ridgelines in forested areas, which are part of a public view to: (1) blend with the existing silhouette; (2) not break or cause gaps within the ridgeline silhouette by removing tree masses; and (3) relate to the ridgeline form.

At the time of the preparation of this document, no alternative building sites have proven to be feasible to accommodate the project.

The project site is located on a ridgeline in a forested area containing 21 significant trees and 21 smaller trees. As discussed in Section 4.e., based on the recommendations of an arborist, the Verizon applicant intends to remove 18 small trees (including 17 dead, 1 damaged) and 3 significant trees (including 1 fallen tree and 2 hazardous Monterey pine trees), and protect the remaining 21 trees. While the trees must be replaced according to Mitigation Measure 3, the project could break or cause gaps within the ridgeline silhouette by removing tree masses, as smaller trees would be used to replace 3 significant trees. Also, as proposed, the antenna poles do not blend into the ridgeline and forest silhouette or environment.

As shown in visual simulations prepared by Verizon and AT&T, the project at its ridgeline location would be visible from a portion of Edgewood Road that is a County-designated "scenic route" from Alameda de las Pulgas to Canada Road. It should be noted that visual simulations received by the County only show the visual impact of each carrier's proposal. The County was not provided a visual simulation representing the project at its full scope (8 antenna poles). Additionally, Station 4 of the visual simulations, which shows the project site from Edgewood Road, does not simulate views from the closest point on Edgewood Road from which the project is visible.

Due to the scope of the project, which involves the maintenance of 3 existing antenna poles and the construction of 5 additional antenna poles on a ridgeline such that the project would be visible from Edgewood Road (a County-designated "scenic route"), the project significantly conflicts with County General Plan Policy 4.27. Mitigation Measure 11 requires the applicants to consider alternative building site(s) which are not on a ridgeline or use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) AND reduce the number of new antenna poles to no more than 3 poles. The construction of 3 new poles that are camouflaged in tree-like forms would blend with the existing ridgeline silhouette and forested environment and would mitigate conflict with General Plan Policy 4.27, such that impacts would be considered less than significant. Staff suggests no more than 3 of these poles, as the construction of more than 3 of these tree-like structures could reduce their camouflaging effect and cause these structures to stand out from real trees at the property, increasing visual impacts to ridgeline views from Edgewood Road.

<u>Mitigation Measure 11</u>: In order to bring the project into compliance with General Plan Policy 4.27 (*Ridgelines and Skylines*), each applicant for Verizon and AT&T shall demonstrate compliance with the following requirements. If the applicants plan to pursue plans at the subject property, each applicant shall amend project plans and visual simulations to demonstrate compliance with Items b and c, subject to review and approval by Planning staff, prior to the approval of a building permit for each proposal.

- a. Consider alternative building site(s) which are not on a ridgeline. Any new proposal would be subject to CEQA requirements.
- b. In order to comply with County General Plan Policy 4.27 regarding construction on a ridgeline in a forested area, which is part of a public view, the applicants shall use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) that would better conform the project to the ridgeline, forested environment; AND,
- c. Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11.b. in order to minimize scenic impact, unless doing so would directly result in a gap in service, in which case alternative means of reducing

scenic impact shall be proposed and implen Development Director.	nented, subjec	t to the approv	al of the Com	munity
Source: County General Plan, Project Visual Sir	nulations.			
10.c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				Х
<b>Discussion:</b> The project site is developed urban conservation plan or natural community conserva		rcel and is not	subject to a h	abitat
Source: County Maps.				
10.d. Result in the congregating of more than 50 people on a regular basis?				Х
<b>Discussion:</b> While the five carriers would each smonth, it would not involve the congregating of m family residential property.				
<b>Source:</b> Descriptions of Each Facility Proposal.		Γ		
10.e. Result in the introduction of activities not currently found within the community?				Χ
<b>Discussion:</b> As the site contains 2 existing wirel the construction of 2 more facilities, the project we site that are not currently found within the community <b>Source:</b> Project Plans.	ould not result			
-				
10.f. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?				X
<b>Discussion:</b> The project would provide improved surrounding community and would not encourage areas or increase the development intensity of all	off-site develo	pment of pres		oped
Source: Project Plans.				
10.g. Create a significant new demand for housing?				Х
<b>Discussion:</b> The project would provide improved surrounding community. Project implementation			•	he area.
Source: Project Plans.				

11.	MINERAL RESOURCES. Would the project	ect:			
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
11.a.	Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				Х
therefo	ssion: The project involves minor grading a ore, would not result in the loss of availability to the region or the residents of the State.  e: Project Plans.				
11.b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				Х
locally other I	ssion: The project involves minor grading a important mineral resource recovery site deland use plan.  ee: Project Plans.				
12.	NOISE. Would the project result in:				
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
12.a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
facilitie of the signific	ssion: The project would generate noise or modification of existing facilities and we San Mateo County Ordinance Code. After cant amounts of noise.  E: San Mateo County Ordinance Code.	ould be subjec	t to the noise	control require	ements
12.b.	Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?			Х	

**Discussion:** The project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. The project involves the location of emergency generators at the project site. Please see Section 12.c., below, for further information. **Source:** Email Correspondence from the Verizon Applicant, dated March 27, 2013. A significant permanent increase in Χ 12.c. ambient noise levels in the project vicinity above levels existing without the project? **Discussion:** As the project involves the location of multiple emergency generators at the residential project site, the project may result in a significant permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The location and housing of the generators are subject to County Policy 58 regarding mechanical equipment. Policy 58 requires mechanical equipment to be located within the building envelope (a minimum of 10 feet from the side property lines and 20 feet from the front and rear property lines for the subject zoning district) unless the equipment is located on the rear half of the parcel and housed in a cabinet for the purpose of reducing noise impacts on neighboring properties where the minimum setback is 3 feet to property line. This policy has been added as Mitigation Measure 12 to ensure project compliance. Mitigation Measure 12: Any new generator associated with this project shall comply with County Policy 58, such that equipment shall be located within the building envelope (a minimum of 10 feet from the side property lines and 20 feet from the front and rear property lines for the subject zoning district) or no closer than 3 ft. to a property line if the equipment is located on the rear half of the parcel and housed in a cabinet for the purpose of reducing noise impacts on neighboring properties. Each applicant shall demonstrate compliance with this requirement prior to the Current Planning Section's approval of a building permit for a new facility or facility modification. **Source:** Email Correspondence from the Verizon Applicant, dated March 27, 2013. 12.d. A significant temporary or periodic Χ increase in ambient noise levels in the project vicinity above levels existing without the project? **Discussion:** See Sections 12.a. and 12.c., above. **Source:** San Mateo County Ordinance Code. Χ 12.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels? Discussion: The site is not located in an airport land use plan nor is it located within 2 miles of a public airport or public use airport. Source: County Map.

or a project within the vicinity of a		Х
rivate airstrip, exposure to people esiding or working in the project area		
excessive noise levels?		

**Discussion:** Should there be a private airstrip in the project vicinity, the project would not expose people residing or working in the project area to excessive noise levels, as the project does not involve the location of sensitive receptors at the project site.

Source: Project Plans.

13.	POPULATION AND HOUSING. Would th	e project:			
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
13.a.	Induce significant population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
surrou or indi	ssion: The project would provide improved unding community and would not induce signirectly. EE: Project Plans.			•	r directly
13.b.	Displace existing housing (including low- or moderate-income housing), in an area that is substantially deficient in housing, necessitating the construction of replacement housing elsewhere?				Х

**Discussion:** The project would not displace existing housing. The single-family residence will be retained.

Source: Project plans.

14. PUBLIC SERVICES. Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
14.a.	Fire protection?				Х
14.b.	Police protection?				Х
14.c.	Schools?				Х
14.d.	Parks?				Х
14.e.	Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				Х

**Discussion:** The project has been reviewed and approved by the San Mateo County Fire Authority. The project would not introduce uses that would impact police protection. The project would not increase school, park, or sewer demand. Regarding water use, see Section 17.d. Regarding electricity and gas use, please see Section 7.a.

Source: Project Referral to San Mateo County Fire Authority.

15.	RECREATION. Would the project:				
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
15.a.	Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?				Х
other r	ssion: The project would not increase the userceational facilities.  e: Project plans.	use of existing	neighborhood	d or regional p	arks or
15.b.	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				Х

**Discussion:** The project does not include recreational facilities or require the construction or expansion of recreational facilities.

Source: Project Plans.

	TRANSPORTATION/TRAFFIC. Would th	e project:			
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
16.a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X
minim minim policy	<b>Ission:</b> The project involves four wireless te tal amount of traffic (approximately eight trips all amount of project traffic, the project does establishing measures of effectiveness for t	s to and from to not conflict wi	the site per mo th an applicab	onth). Due to a le plan, ordina	а
Sourc	ce: Project Plans.			ation system.	
16.b.	Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?			ation system.	Х
Discuminim minim manag	Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for	s to and from t	tion facilities th	nat would gene	erate a

<b>Discussion:</b> The project would not affect air traf	fic natterns											
Source: Project Plans.	no patterns.											
16.d. Significantly increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?												
<b>Discussion:</b> The project does not involve an increase in hazards to a design feature as all improvements are limited to private property, nor does it increase hazards through the introduction of an incompatible use. <b>Source:</b> Project Plans.												
Source: Project Plans.		T	Г									
16.e. Result in inadequate emergency access?												
<b>Discussion:</b> Project improvements are limited to private property and would not result in inadequate emergency access. The project has been reviewed and approved by the San Mateo County Fire Authority and is subject to its requirements. <b>Source:</b> Project Plans.												
16.f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?												
<b>Discussion:</b> The site is private, single-family resont conflict with adopted policies, plans, or prografacilities.												
Source: Project Plans.												
16.g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?				Х								
<b>Discussion:</b> The proposed uses would not increpatterns.	ase pedestriar	n traffic or a ch	ange in pedes	strian								
Source: Project Plans.												
16.h. Result in inadequate parking capacity?			X									
<b>Discussion:</b> The project involves four wireless to minimal amount of traffic (approximately eight tripic crews) and minimal associated parking demand. parking demand is low.	s to and from	the site per mo	onth by mainte	nance								
Source: Project Plans.												

17.	UTILITIES AND SERVICE SYSTEMS. W	ould the proje	ct:		
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
17.a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				Х
gener Health	ssion: The project would not result in a negate wastewater. The plans have been review Division, who regulates septic systems.				
17.b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				Х
waste	ssion: The project does not require nor wo water treatment facilities or expansion of exice: Project Plans.			on of new wate	er or
17.c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				Х
faciliti	es or expansion of existing facilities. See Sece: County's Drainage Policy; Project Plans.	ection 9.c. abo			drainage
17.d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				Х
an inc Water	rease in landscaping requiring irrigation. New Efficient Landscape Ordinance. Should new measures would be required by the Ord	w landscaping w landscaping	must comply	with the Coul	

Source: Project Plans; County Water Efficient Landscape Ordinance.

17.e.	Result in a determination by the waste- water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X								
	Discussion: The project would not generate wastewater.  Source: Project Plans.												
17.f.	Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?												
Discussion: The project would not generate solid waste.													
Sourc	e: Project Plans.												
17.g.	Comply with Federal, State, and local statutes and regulations related to solid waste?			Х									
Discu	ssion: The project would not generate solid	d waste.											
Sourc	e: Project Plans.												
17.h.	n. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?												
<b>Discussion:</b> While the project does not incorporate solar or other alternative energy sources, as discussed in Section 7.a., the project would result in a minimal increase in electricity consumption at the property. Regarding water use, see Section 17.d. The project would not generate solid waste. <b>Source:</b> Project Plans.													
17.i.	Generate any demands that will cause a public facility or utility to reach or exceed its capacity?				Х								
<b>Discussion:</b> The project would require minimal utility services. The project would not increase school, park, or sewer demand at the site. Regarding water use, see Section 17.d. Regarding electricity and gas use, please see Section 7.a.													
Sourc	Source: Project Plans.												

18.	MANDATORY FINDINGS OF SIGNIFICANCE.												
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impaci								
18.a.	Does the project have the potential to degrade the quality of the environment, significantly reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X								
of the wildlife comm elimin	ussion: As discussed in Section 4 of this doc e environment, significantly reduce the habitate e population to drop below self-sustaining leve nunity, reduce the number or restrict the ranguate important examples of the major periods ce: CNDDB Database.	t of a fish or w vels, threaten le of a rare or	ildlife species to eliminate a endangered p	cause a fish plant or animal lant or animal	or al								
18.b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current		X										
	projects, and the effects of probable future projects.)												
faciliti impac reduc	projects, and the effects of probable future projects.)  ussion: The project involves all existing facilities and facility modifications, which cumulatives. However, as discussed in this document be project related impacts to less than significations.	vely could resu , implementat	ult in considera	able environm	ental								
faciliti impac reduc	projects, and the effects of probable future projects.)  ussion: The project involves all existing facilities and facility modifications, which cumulativets. However, as discussed in this document	vely could resu , implementat	ult in considera	able environm	ental								

**Discussion:** As previously discussed, the project could result in environmental impacts that could both directly and indirectly cause impacts on human beings. However, implementation of mitigation measures included in this document would adequately reduce project impacts to a less than significant level.

**Source:** See sources throughout this document.

**RESPONSIBLE AGENCIES**. Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
U.S. Army Corps of Engineers (CE)		Χ	
State Water Resources Control Board		Х	
Regional Water Quality Control Board		Х	
State Department of Public Health		Χ	
San Francisco Bay Conservation and Development Commission (BCDC)		Х	
U.S. Environmental Protection Agency (EPA)		Х	
County Airport Land Use Commission (ALUC)		Х	
CalTrans		X	
Bay Area Air Quality Management District		Х	
U.S. Fish and Wildlife Service		Х	
Coastal Commission		Х	
City		Х	
Sewer/Water District:		Х	
Other:			

MITIGATION MEASURES		
	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.		Х
Other mitigation measures are needed.	Х	

The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:

<u>Mitigation Measure 1</u>: Prior to Planning's final approval of the building permit for any new or modified facilities, all new reflective surfaces shall be screened or painted such that surfaces are no longer reflective.

<u>Mitigation Measure 2</u>: As recommended by David L. Babby (Registered Consulting Arborist #399), in a report dated February 23, 2012, the applicant shall remove 18 trees that are less than 6" in diameter (including 17 dead, 1 damaged), and 3 trees that are 6" or more in diameter (including 1 fallen tree and 2 hazardous trees).

<u>Mitigation Measure 3</u>: For the protection of retained trees, the applicant shall comply with the Tree Protection Measures as outlined in the report prepared by David L. Babby (Registered Consulting Arborist #399), dated February 23, 2012. In addition, the applicant shall consult with Mr. Babby regarding additional measures to improve the health of existing trees (such as irrigation, fencing, trimming, fertilization, treatment, etc.) and demonstrate to County staff the implementation of additional recommendations. If any of the retained trees should die, the applicant shall replace the tree(s) as outlined in Mitigation Measure 4. Tree removals are subject to Design Review (DR) District Zoning Regulations and County permit requirements.

<u>Mitigation Measure 4</u>: The property owner shall comply with the following requirements regarding tree replacement:

- a. For removal of trees that are 6 inches or more in diameter, these trees shall be replaced at a ratio of 3:1 using a minimum of 5-gallon size stock. For trees that are less than 6" in diameter, trees shall be replaced using a minimum of 5-gallon size stock at a 1:1 ratio.
- b. For indigenous trees, trees shall be replaced using the same species. Exotic trees shall be replaced with an indigenous species.
- c. A surety deposit of \$4,000 for both performance (installation of tree, staking, and providing an irrigation system) and maintenance of planted trees is required prior to the Current Planning Section's approval of the building permit for this project. Maintenance shall be required for five years. Maintenance reports, as prepared by a certified arborist, shall be submitted to the Project Planner on an annual basis by April 30 after planting.
- d. During the maintenance period, the property owner at his/her expense shall replace any dead or dying tree(s). Under such circumstances, the maintenance period will be extended for a period of two (2) additional years.
- e. Release of the performance and maintenance surety shall only be allowed upon the satisfactory installation and maintenance and upon inspection by the County.

<u>Mitigation Measure 5</u>: All new tree plantings shall conform to recommendations for "future planting design" as outlined in the report.

<u>Mitigation Measure 6</u>: An archeologist shall be present on-site to observe all land disturbing activities. Should any cultural resource(s) be found, all work shall cease until an archeological or paleontological report (as applicable) is provided to Current Planning Section staff and all recommendations of the report are implemented to minimize damage to archeological and/or paleontological resources.

<u>Mitigation Measure 7</u>: The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.

<u>Mitigation Measure 8</u>: The construction or modification of antenna poles and associated equipment requires a building permit. Geotechnical review of each new or modified facility is required at the building permit stage. Each applicant shall demonstrate compliance with

geotechnical recommendations in the design of each facility prior to the County's issuance of a building permit.

<u>Mitigation Measure 9</u>: Prior to the Current Planning Section's approval of the building permit required for each new facility or facility modification, each carrier shall submit an Erosion and Sediment Control Plan, where each plan shall include adequate stormwater pollution prevention measures, as determined by Planning staff. The Erosion and Sediment Control Plan shall be implemented prior to land disturbance and throughout the construction process until all disturbed areas are stabilized or landscaped. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

<u>Mitigation Measure 10</u>: The applicant shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including, but not limited to, the following:

- a. Delineation with field markers of clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses within the vicinity of areas to be disturbed by construction and/or grading.
- b. Protection of adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
- c. Performing clearing and earth-moving activities only during dry weather.
- d. Stabilization of all denuded areas and maintenance of erosion control measures continuously between October 1 and April 30.
- e. Storage, handling, and disposal of construction materials and wastes properly, so as to prevent their contact with stormwater.
- f. Control and prevention of the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- g. Use of sediment controls or filtration to remove sediment when dewatering site and obtain all necessary permits.
- h. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilization of designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- I. Training and providing instruction to all employees and subcontractors regarding the Watershed Protection Maintenance Standards and construction Best Management Practices.
- m. Additional Best Management Practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.
- n. Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time.

Mitigation Measure 11: In order to bring the project into compliance with General Plan Policy 4.27 (Ridgelines and Skylines), each applicant for Verizon and AT&T shall demonstrate compliance with the following requirements. If the applicants plan to pursue plans at the subject property, each applicant shall amend project plans and visual simulations to demonstrate compliance with Items b and c, subject to review and approval by Planning staff, prior to the approval of a building permit for each proposal.

- a. Consider alternative building site(s) which are not on a ridgeline. Any new proposal would be subject to CEQA requirements.
- b. In order to comply with County General Plan Policy 4.27 regarding construction on a ridgeline in a forested area, which is part of a public view, the applicants shall use structural design alternatives for new antenna poles (such as using a pine or redwood tree form) that would better conform the project to the ridgeline, forested environment; AND,
- c. Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11.b. in order to minimize scenic impact, unless doing so would directly result in a gap in service, in which case alternative means of reducing scenic impact shall be proposed and implemented, subject to the approval of the Community Development Director.

Mitigation Measure 12: Any new generator associated with this project shall comply with County Policy 58, such that equipment shall be located within the building envelope (a minimum of 10 feet from the side property lines and 20 feet from the front and rear property lines for the subject zoning district) or no closer than 3 ft. to a property line if the equipment is housed in a cabinet for the purpose of reducing noise impacts on neighboring properties. Each applicant shall demonstrate compliance with this requirement prior to the Current Planning Section's approval of a building permit for a new facility or facility modification.

ead Agency).
NOT have a significant effect on the environment, and e prepared by the Planning Department.
ject could have a significant effect on the environ- ant effect in this case because of the mitigation en included as part of the proposed project. A prepared.
have a significant effect on the environment, and an RT is required.
Ohnilleter
(Signature)
Camille Leung, Planner III  Name. Title

### **ATTACHMENTS**:

### **Project Site**

- A. Vicinity Map
- B. Project Plans (includes all 4 facilities at Full Project Build-Out), dated September 18, 2012. (Notes: Project plans in Attachment H for the AT&T site show 2 antennas and a lease area of 96 sq. ft. The site shown in plans prepared by Verizon show an earlier version of the project which included only 1 antenna pole and a 265 sq. ft. lease space. The Metro PCS site shown is not part of the project as the application is inactive.)
- C. RF Report (includes all 4 facilities at Full Project Build-Out), dated January 28, 2013
- D. CNDDB Database Results
- E. Arborist Report prepared by David L. Babby (Registered Consulting Arborist #399), dated February 23, 2012

### Verizon

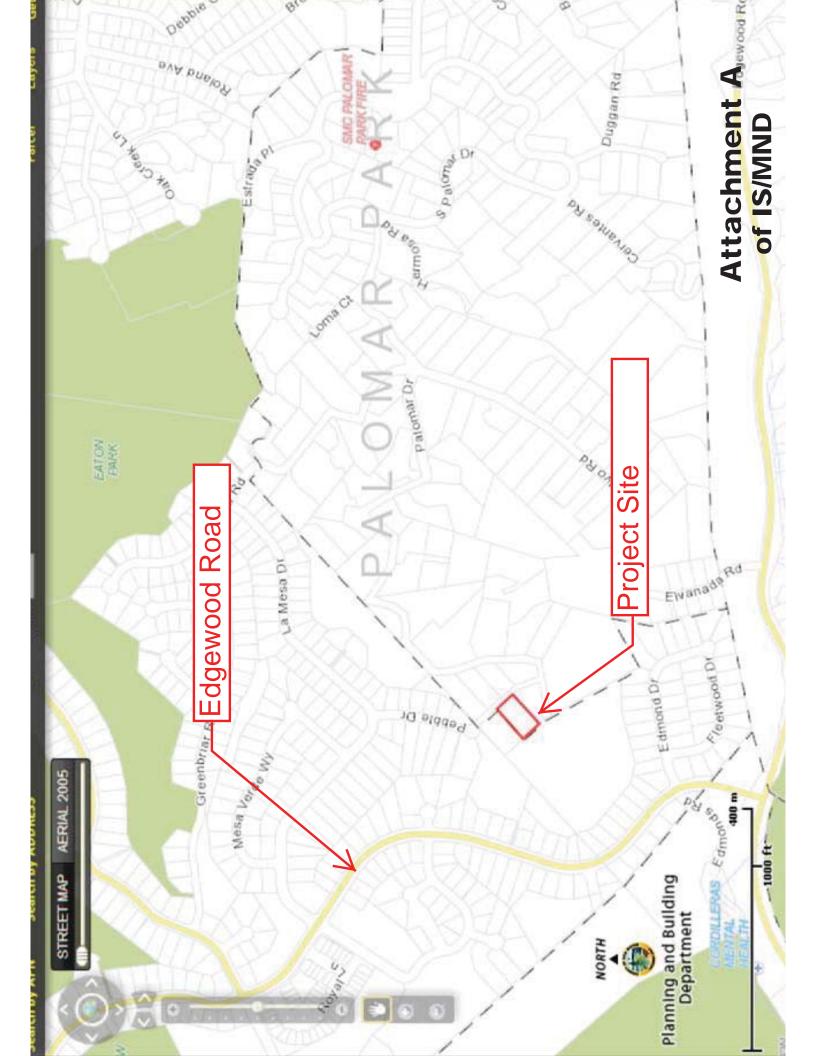
- F. Project Plans for Verizon Proposal, dated July 8, 2011
- G. Visual Simulations for Verizon Proposal, dated October 18, 2012

### AT&T

- H. Project Plans for AT&T Proposal, dated June 20, 2013
- Visual Simulations for AT&T Proposal, dated August 24, 2010. (Note: simulations were prepared for a previous proposal which included a facility on an existing utility pole. No simulations for the current proposal have been provided.)

CML:jlh/fc – CMLX0851\_WJH.DOCX

Note: Attachment C of the IS/MND has been excluded as it is superceded by Attachment G of the staff report.





# EDGEWOOD & CRESTVIEW SITE NAME:

TOTIZOT Wireless

### SITE NUMBER: 123279

MSA Architecture & Planning, I

NSA Wireless, Inc.

REDWOOD CITY, CA 94062 1175 PALOMAR DRIVE SAN MATEO COUNTY



THESE PLANS SHALL NOT BE UTILIZED AS CONSTRUCTION DOCUMENTS UNTIL ISSUANCE OF A BUILDING PERMIT AND ALL SHEETS HAVE BEEN ISSUED "FOR CONSTRUCTION".

PROJECT SUMMARY:

COAX CABLE RUNS UNDERGROUND FROM EQUIPMENT TO PANEL ANTENNAS. EELEPHONE AND ELECTRICAL SERVICE FROM ADJACENT EXISTING JITLY POLE.

PETURE SCHOOL SC

ALL WORK AND METERALS SALL BE PERFORED AND METALLE BY A METALLOWN CONCES AS A ADOPTED BY THE LOCAL GOVERNMEN ALTHORNER OF THE CONCESSINCTED PERMIT WHEN NOT CONFIDENCE DATES.

1: CALIFORNA ADMINISTRATOR CODE
(INCL. TILES 24 & 23) 2010
2: CALIFORNA BULIDING CODES 2010
3: CALIFORNA ELECTRICAL CODES 2010
5: CALIFORNA ELECTRICAL CODES 2010
6: CALIFORNA PULMBING CODES
7: LOCAL BULIDING CODES
8: CALIFORNA PUER CODE 2010
8: CALIFORNA PUER CODE 2010
9: CALIFORNA PUER CODE 2010 EDITION

CODE COMPLIANCE

H2W00D 5164 FRY ROAD VACAVILLE, CA 95687 (707) 448-7332 (707) 448-8190

SURVEYOR; consultant's name address city, state, zip phone; fax:

JABEL
MAXMOM
MECHANICAL
MECHANICAL
MANNIFACURER
MANNIFACURER
MINIMAL
MINIMETER(S)
MATERIAL
NOT 70 SCALE
OUTSIDE DIAMETER

ABBREVIATIONS

FACILIY IS UNMANNED AND NOT FOR HUMAN HABITATION.
HANDLOAPPE ACCESSES IS NOT REQUIRED IN ACCORDANCE WITH
2010 CALIFORNIA BULLING. CODE, TITLE 24, FART 24, VOL. 1,
CHAPTER 118, SECTION 112382. EXCEPTION 1 THE PROJECT CONSISTS OF THE INSTALLATION OF A VERIZON WIRELESS EQUIPMENT CABINETS MOUNTED ON A CONCRETE SLAB ON GRADE WITHIN A WOOD FENCE TO MATCH (E) WOOD FENCE NSTALLATION OF (6) PANEL ANTENIAS MOUNTED ON DIRECT BURIAL (3) 6"X.20" PIPES, (2) GPS ANTENIAS MOUNTED ON WOOD FENCE. PAINTED GREEN TO MATCH SURROUNDINGS.

## ACCESSIBILITY REQUIREMENTS

SEE	VERIZON WIRELESS 2785 MITCHELL DRIVE	WALNUT CREEK, CA 9459 JIM GRAHAM (925) 279—6333	NSA WIRFIESS
APPLICANT/LESSEE	NAME: ADDRESS:	CONTACT: PHONE:	AGENT

INSTALLATION OF (N) LANDSCAPING FOR EQUIPMENT SCREENING. (E)
TREES TO BE REPLACED AS NEIDED, PER ABORIST
PROJECT DESCRIPTION

2000 CRW CANTON PLACE, STE.
500 CRW CANTON PLACE, STE.
501 RAMON, CA 94883
(925) 444-1890
(925) 444-1890
FOCER SHARP – CONST. MANAGER
(510) 918-9169

PROPERTY INFORMATION
OWNER: CURTIS
ADDRESS: 1175 P.

CURTIS L. & ETHEL R. BROOKS 1175 PALOMAR DRIVE REDWOOD CITY, CA 94062 CURTIS L. & ETHEL R. BROOKS (650) 367-8000

HE INFORMATION CONTAINED IN THIS TO TO DOCUMENTS IS PROPRIETARY IN MATURE, ANY USE OR DISCLOSURE THER THAN THAT WHICH RELATES TO STRICILY OCHINED.

09/18/12 100% ZONING APP. 08/30/12 90% ZONING APP.

123279 EDGEWOOD AND CRESTVIEW REDWOOD CITY, CA 94662 SAN MATEO COUNTY

N/A R-1/S-101/DR 051-416-040 TOWER NUMBER: CURRENT ZONING: A.P.N.: NAD: LAT: LONG:

MSA ARCHITECTURE AND PLANNING, INC. 3940. 2011 FIRETT SAN FRANCISCO. A 94114 ROBERT ZEHM. (415) 503-1363 (949) 251-1120

ARCHITECT:
CONSULTANT'S NAME
ADDRESS
CITY, STATE, ZIP
CONTACT:
PHONE:
FAX:

83 (LOCATION 2 PER SURVEY) N 37 28' 41.16" W 122' 16' 44.57" 83 (LOCATION 1 PER SURVEY) N 37' 28" 41.41" W 122' 16' 44.77" 83 (LOCATION 3 PER SURVEY) N 37 28" 40.76" W 122" 16" 43.89"

NOTE: NORTH SHOWN HAS BEEN ESTABLISHED USING COMPASS AND IS APPROXIMATE. ALL ANTENNA AZMINITHS ARE MAGNETIC NORTH. MACHETIC DEVALTION HAS NOT BEEN ACCOUNTED FOR VEHEY TRUE NORTH PRIOR TO INSTALLATION OF ANTENNAS.

PROJECT SUMMARY

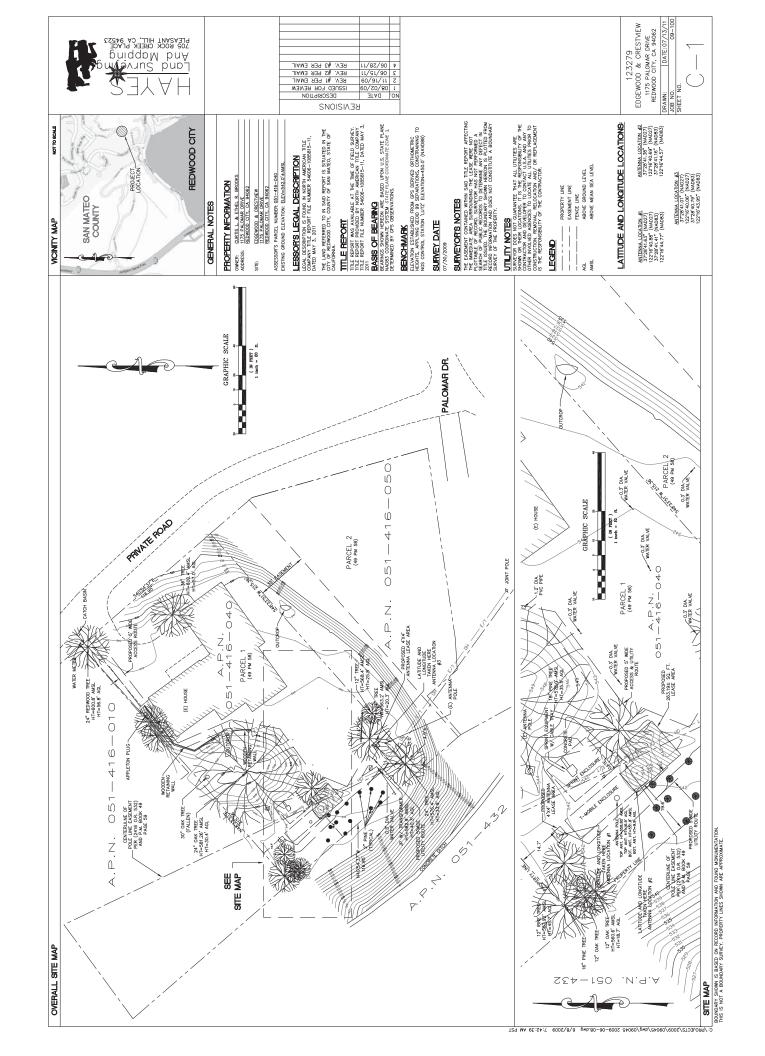
PROJECT TEAM

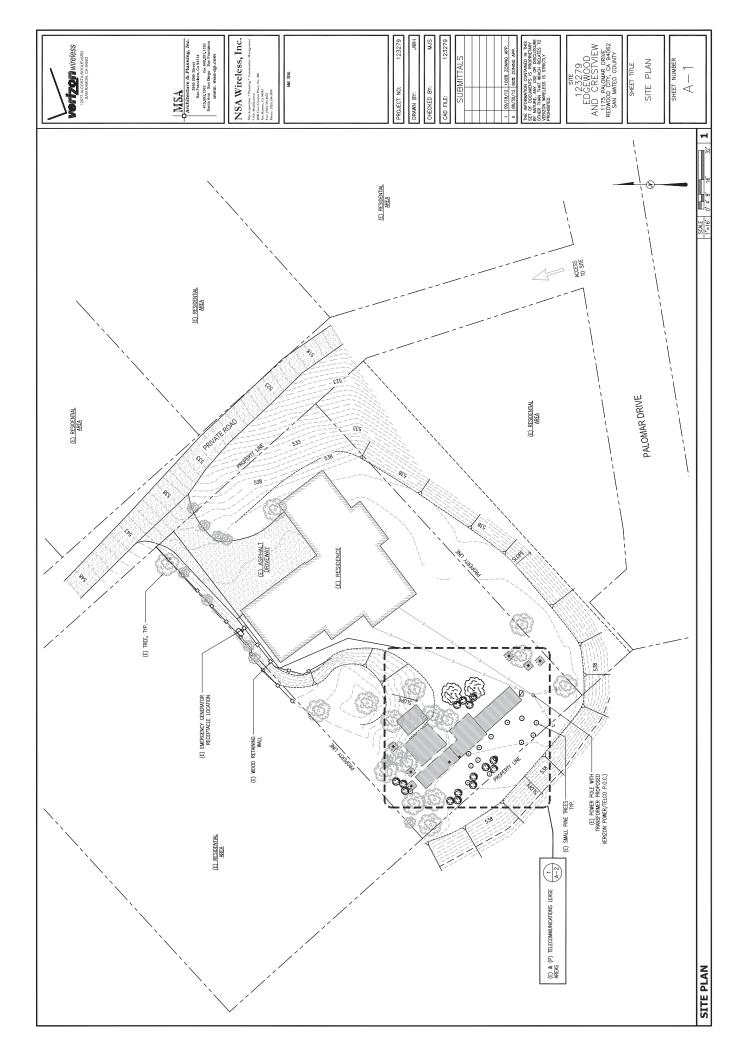
DRIVING DIRECTIONS

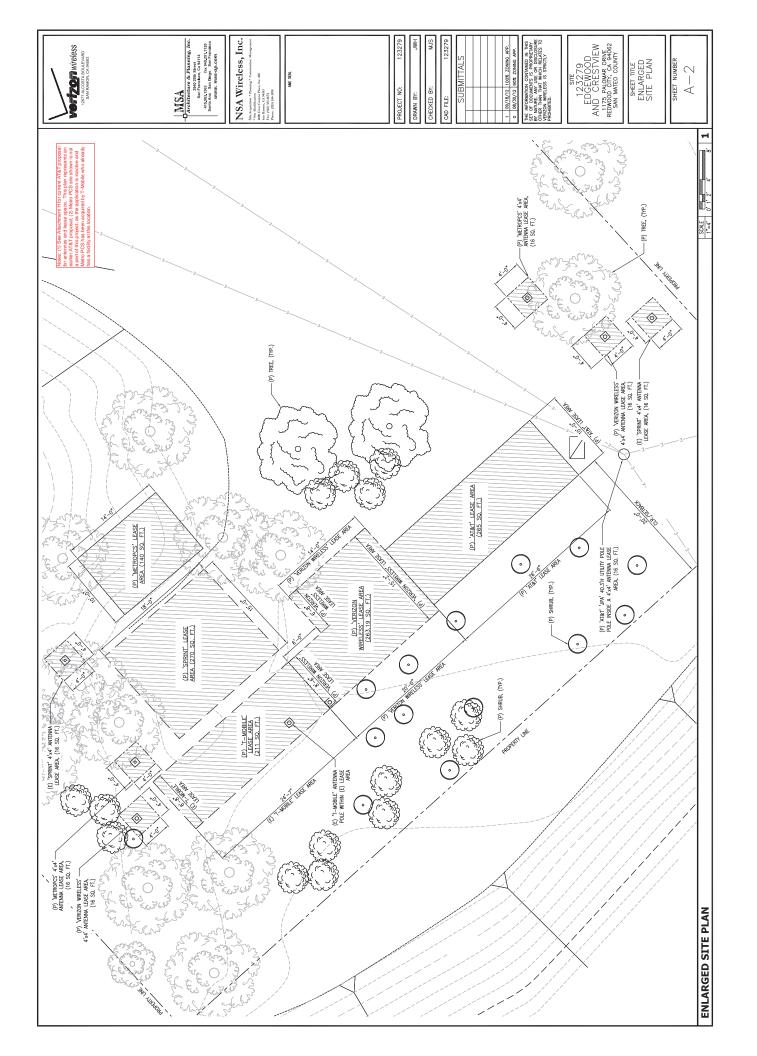
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9	TO THE PERSON OF		S B B A A	(Property of the state of the s		Juff	A BE	S S S S S S S S S S S S S S S S S S S	100	MON PEBBLE-1	TO	NA REDWOOD CITY	SE	VICINITY MAD	VICINIII I'IAT	SITE DIRECTIONS FROM VERIZON WIRELESS WALNUT CREEK OFFICE:	1. START AT 2785 MITCHELL DR. WAINIT CREEK = GO 0.2	2. TURN LEFT ON N WIGET LIN — GO 0.3 MI 3. TURN RIGHT ON YOMACIO VALLEY RD — GO 0.3 MI	4. MAKE SHARP LEFT TURN ONTO I-680 SOUTH TOWARD SAN JOSE - GO	5. TAKE THE I-580 EXIT TOWARD WEST DUBLIN/OAKLAND RD - GO 10.1 MI	6. TAKE LEFT FORK ONTO 1-238 NORTH TO WARD 1-880 - GO 1.8 MI 7. TAKE THE 1-880 SOUTH EXIT TOWARD SAN JOSE/SAN MATEO BR - GO	4.0 MI 8. THE CA-92 EXIT TOWARD SAN MATEO BR - GO 13.3 MI 0. TAKE THE IS-101 COUTU EVET TOWARD CAN INCE - CO 5.9 MI	10. TAKE THE WHIPPLE AVE/REDWOOD CITY EXIT ONTO VETERAN BLVD — GO	11. TURN RIGHT ON WHIPPLE AVE - GO 1.4 MI	13. TURN KIGHI ON ALAMEDA DE LAS POLGAS — GO U.4 MI 13. TURN LEFT ON EATON AVE — GO 0.3 MI	14. IDRN LEFT ON CLIFFORD AVE = GO U.S MI 15. BEAR RIGHT ON PALOMAR DR = GO 1.4 MI	

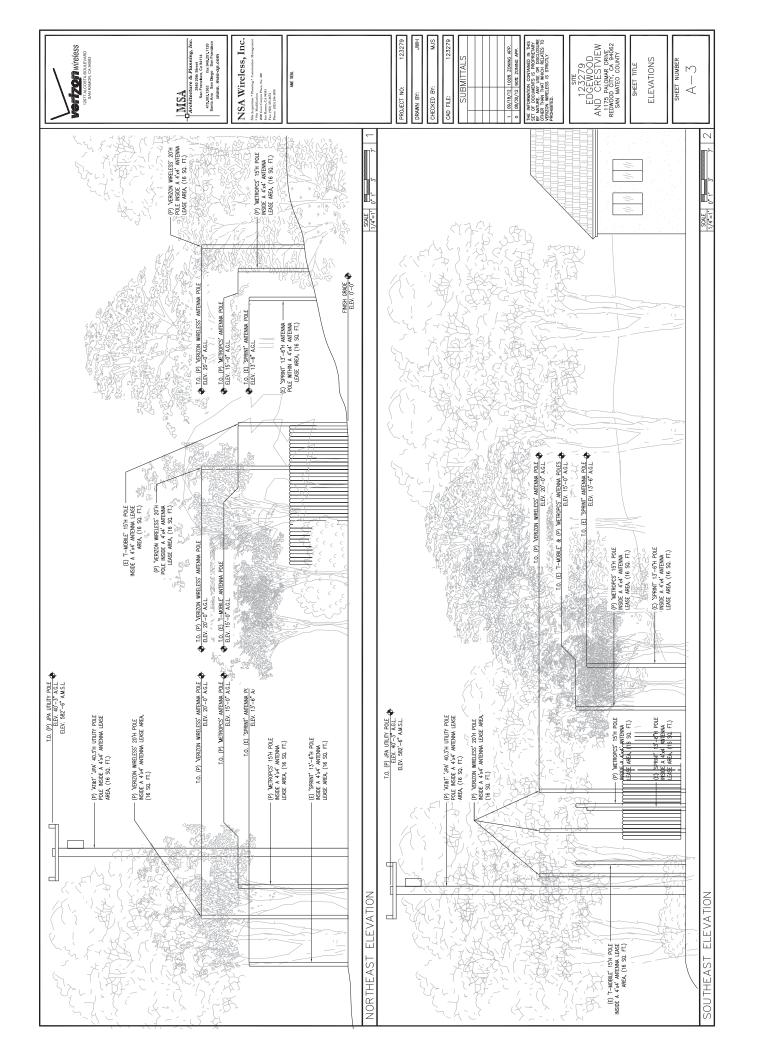
Attachment B of IS/MND

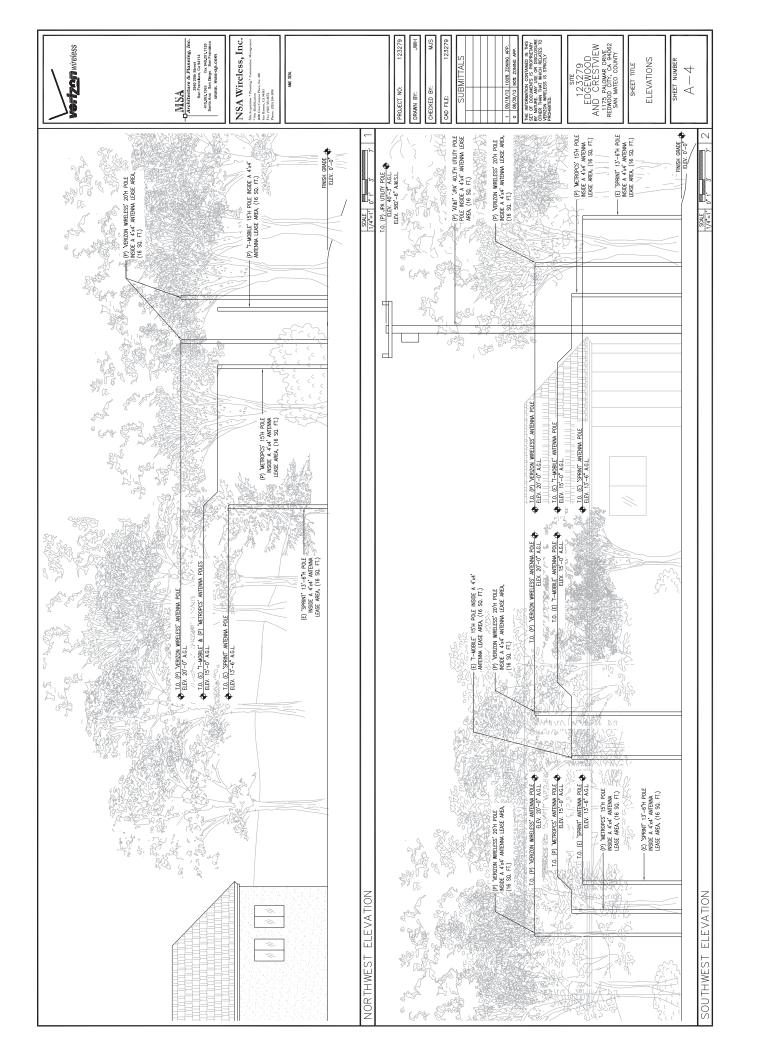
TITLE SHEET SHEET NUMBER 











Brooks CNDDB\_2013

#### **ARBORIST REPORT**

## VERIZON CELLULAR EQUIPMENT 1175 PALOMAR DRIVE REDWOOD CITY, CALIFORNIA

SITE NAME: Edgewood & Crestview SITE NUMBER: 123279

#### Prepared for:

MSA Architecture & Planning, Inc. 301 8<sup>th</sup> Street, Suite 250 San Francisco, CA 94103

#### Prepared by:

David L. Babby
Registered Consulting Arborist #399
Board-Certified Master Arborist #WE-4001B

#### **TABLE OF CONTENTS**

<u>SECTION</u>	TITLE	<u>PAGE</u>
1.0	INTRODUCTION	1
2.0	TREE COUNT AND COMPOSITION	1
3.0	TREE PROTECTION MEASURES	3

#### **EXHIBITS**

<u>EXHIBIT</u>	TITLE
А	TREE INVENTORY TABLE
В	SITE MAP

#### 1.0 INTRODUCTION

I have been retained by MSA Architecture & Planning, Inc. to provide this updated arborist report (from my previous one dated 11/2/09) regarding the proposed installation of cellular equipment near existing trees located at 1175 Palomar Drive, Redwood City (project named Edgewood & Crestview). I revisited the site on 2/14/12, and this report presents my analysis and recommendations.

#### 2.0 TREE COUNT AND COMPOSITION

Twenty-four (24) trees of seven various species were inventoried for this report. They are numbered as 1, 4-7 and 9-27, and the following table identifies their names, numbers, counts and percentage:

NAME	TREE NUMBER(S)	E Œ UNT	% OF
coast live oak	11, 12, 21	3	13%
coast redwood	6, 14, 22	3	13%
silver-dollar gum	1, 19	2	8%
red-flowering gum	17	1	4%
Italian cypress	4, 5	2	8%
Monterey pine	7, 9, 10, 13, 15, 16, 20, 23-27	12	50%
valley oak	18	1	4%

Total 24 100%

<u>Specific information</u> regarding each tree is presented within the table in **Exhibit A**, and the trees' approximate <u>locations and numbers</u> can be viewed on the map in **Exhibit B** (a copy of Sheet L-4, *Arborist Plan*, dated 7/8/11).

During a previous site visit performed in 2009, I identified 18 very small trees of approximately five-gallon size that were planted in the backyard in proximity to the existing and proposed equipment; they include 14 coast redwoods (Sequoia sempervirens) and four coast live oaks (Quercus agrifolia). Of these, 16 are located between the equipment and top of the hillside bank, and two (both redwoods) are situated on each side of tree #12. All but one tree have broke and/or died, and the surviving one, a coast live oak, has significant trunk damage likely caused by deer.

My site examination reveals that the cause of the trees' decline or demise was likely caused by [1] a lack or complete absence of irrigation to the rootballs, and any water supplied by the drip emitters being insufficient, and [2] deer damage to trunks and irrigation lines. To provide the greatest opportunity for establishing new trees for this site, the future planting design should incorporate the following:

- a) A four- to six-foot tall circular wire fence or other effective barrier should be established around the perimeter of the trees' canopies to restrict the deer from accessing the trunks and branches.
- b) The irrigation system should contain one or two bubblers per tree, with the end placed on top of the rootball (versus in a sleeve) at around the one-half or threequarters of the distance between the trunk and rootball edge. The bubblers should also be staked to the ground.
- c) An eight-inch tall, circular berm should be formed around the perimeter of the root ball, and consist of soil.
- d) Irrigation should be placed on an automatic timer, applying approximately 10 gallons of water per inch of trunk diameter every week during the months of March thru November, and every two weeks during any dry winter months (this can be increased or decreased as needed so that the first 24 inches of ground surrounding

the rootball becomes thoroughly wet, but not oversaturated, and the water drains and the soil dries up for a few days or more before water is reapplied).

e) A two- to three-inch layer of wood-chip mulch should be spread on top and 12 inches beyond the root ball (but not piled against the trunks).

Since 2007, three trees have been removed and one has fallen over. The removed trees include #2 and 3 (Italian cypress), and #8 (a dead Monterey pine). The fallen tree, which remains on-site, is #11, and was a large, nearly dead coast live oak prior to falling.

Two standing Monterey pines, #9 and 10, are nearly dead and should be removed as soon as possible, regardless of the proposed project, due to the significant safety threat they present to the adjacent home and residents.

#### 3.0 TREE PROTECTION MEASURES

Recommendations presented within this section are intended to serve as guidelines for achieving the viable mitigation and protection of retained trees. They should be carefully followed, incorporated into the construction plans, and I should be consulted in the event any cannot be feasibly implemented.

- 1. The concrete slab proposed within 12 feet from tree #16's trunk should be established on top of existing soil grade with no more than four-inch vertical soil cut, including for base material, edging and forms.
- 2. Fencing should be installed prior to any activities for the purpose of restricting access within tree protection zones. For this project, orange-plastic fencing or chain link panel appears sufficient, and I can be consulted as to the location and placement prior to construction or trenching commencing.

- 3. Surface scraping and grading beyond the trench and equipment area should be avoided where beneath tree canopies.
- 4. The future trench for the underground coax should be dug as far as possible from the trunks of trees #20 and 23 (i.e. along the northeast edge of the easement).
- 5. Trenching within five feet from tree #20's trunk and 15 feet from tree #23's trunk must be manually performed using shovels; this should also apply to all other trees where beneath their canopies, and should be performed under my supervision. Roots encountered during the process with diameters of two inches and greater should be retained and left intact. Within one-hour of becoming exposed, moistened burlap should be wrapped around the roots, and remain continually moist until the trench is backfilled. Personnel shall not step or walk on the exposed roots.
- 6. Fiber rolls installed for erosion control beneath tree canopies should require a maximum embedment of two inches.
- 7. Spoils created during trenching should be placed on a tarp and/or full sheets of plywood. Great care should be taken to not pile soil on unpaved soil beneath the trees' canopies or against the trees' trunks.
- 8. Two weeks prior to trenching, the root zones of trees adjacent to construction and trenching should be thoroughly soaked. The same should occur two weeks after trenching begins, and repeated every six weeks the following year during the months of May thru October.
- 9. Prior to commencing activities, I recommend a four-inch layer of coarse wood chips is manually spread on top of existing soil grade beneath the canopies of trees #14-16, 20, 23 and 24 (excluding where equipment will be installed). The wood chips should not be piled against the trunks.

10. Digging for fence posts within 12 feet of tree #16's trunk should be manually performed using a post-hole digger. Roots encountered with diameters of two inches and greater should be retained and the hole moved to either side.

11. Access on unpaved sections beneath the trees' canopies must be restricted to foottraffic and wheelbarrows only. In the event the ground has become saturated, plywood should be laid on the soil surface prior to construction activities.

12. Materials must not be placed against the trees' trunks. Except where construction is to occur, materials should be stored or piled beyond the trees' canopies.

13. A cleaning pit should be identified prior to construction commencing and established beyond the trees' canopies. Please note that equipment must not be cleaned beneath the canopies, nor shall harmful products be applied or disposed of (such as cement, paint, chemicals, oil, gasoline and herbicides).

14. Drainage for the site shall not be modified in a manner that would discharge water beneath the canopies or towards the trunks.

15. Any existing, unused pipes or lines below ground and beneath the canopies should remain buried and be abandoned.

16. Great care should be taken by all construction personnel to avoid damaging the branches and trunks.

17. Any tree pruning required for clearance should be performed by me or under my supervision, and the work performed in accordance with ANSI A300-2001 standards.

Prepared By:

David L. Babby

Registered Consulting Arborist #399® Board-Certified Master Arborist #WE-4001B Date: February 23, 2012



#### **EXHIBIT A:**

#### TREE INVENTORY TABLE

#### TREE INVENTORY TABLE

silver-dollar gum (Eucalyptus polyanthemos)  Comments: Has been signficantly reduced in height and width.  REMOVED  Comments: Was an Italian cypress with an 8" trunk diameter.  REMOVED  Comments: Was an Italian cypress with an 8" trunk diameter.  Italian cypress (Cupressus sempervirens)  6 100% 100% Good	5
Comments: Has been signficantly reduced in height and width.  2 REMOVED Comments: Was an Italian cypress with an 8" trunk diameter.  3 REMOVED Comments: Was an Italian cypress with an 8" trunk diameter.  Comments: Was an Italian cypress with an 8" trunk diameter.  Italian cypress (Cupressus sempervirens) 6 100% 100% Good	-
Comments: Was an Italian cypress with an 8" trunk diameter.  3 REMOVED Comments: Was an Italian cypress with an 8" trunk diameter.  Italian cypress (Cupressus sempervirens) 6 100% 100% Good	3
REMOVED Comments: Was an Italian cypress with an 8" trunk diameter.  Italian cypress (Cupressus sempervirens) 6 100% 100% Good	
Comments: Was an Italian cypress with an 8" trunk diameter.  Italian cypress 4 (Cupressus sempervirens) 6 100% 100% Good	
Italian cypress 4 (Cupressus sempervirens) 6 100% 100% Good	
4 (Cupressus sempervirens) 6 100% 100% Good	
	5
Comments:	
Italian cypress 5 (Cupressus sempervirens) 6 100% 100% Good	5
Comments:	
coast redwood 6 (Sequota sempervirens) 34 75% 50% Fair	2
Comments:	
Monterey pine 7 ( <i>Pinus radiata</i> ) 26 40% 50% Poor	2
Comments: Branch tip dieback indicative of pine pitch canker infecti	
8 REMOVED	-
Comments: Tree has been removed; it was a dead Monterey pine.	
Monterey pine 9 (Pinus radiata) 22 20% 30% Poor	3

Comments: Extremely sparse canopy. Tree is dying and should be removed. Heavy limbs overhanging roof.

Project Site: 1175 Palomar Drive, Redwood City; #123279 Prepared for: MSA Architecture Planning, Inc. Prepared by: David L. Babby

#### TREE INVENTORY TABLE

TREE	TREE NAME	Estimated Trunk Diameter (n.)	Health Condition (100%=Bect. 0%=Worst)	Structural Integrity (£00%=Best: 096=Worst)	Overall Condition (Good/Fail/Pool/Dead)	Intensity of Impacts (1=Highest, 5=towest)
10	Monterey pine ( <i>Pinus radiata</i> )	24	10%	30%	Poor	3
	Comments:	Extremely sp	arse canopy.	Tree is dying	and should b	e removed.
11	coast live oak (Quercus agrifolia)	37 Tree has faile	0%	0%	Dead/ Fallen	¥
	Comments:	ree nas rane	ed and is lying	g on the groun	id.	
12	coast live oak (Quercus agrifolia)	27, 4	60%	20%	Poor	5
	Comments:	Significant de	есау.			
13	Monterey pine (Pinus radiata)	14	40%	50%	Poor	5
	Comments:	Sparse canop	у.			
14	coast redwood (Sequoia sempervirens)	14, 10, 8, 7, 5	50%	30%	Poor	3
	Comments:	Contains five very sparse d	w. m.		e same stump	Canopy is
15	Monterey pine (Pinus radiata)	18	70%	30%	Fair	2
	Comments;		factor that in	grow with a v creases the ris one to failure.	sk of limb fail	
16	Monterey pine (Pinus radiata)	18	70%	30%	Fair	1
	Comments:	Located bene	ath high-volta	age electrical	lines, .	
17	red-flowering Gum (Corymbia ficifolia)	14, 12, 11, 9, 5	80%	30%	Fair	2
	Comments:	Multiple trun	ks and a weal	structure.	85	
18	valley oak (Quercus lobata)	12	100%	70%	Good	5

Project Site: 1175 Palomar Drive, Redwood City; #123279 Prepared for: MSA Architecture Planning, Inc. Prepared by: David L. Babby

#### TREE INVENTORY TABLE

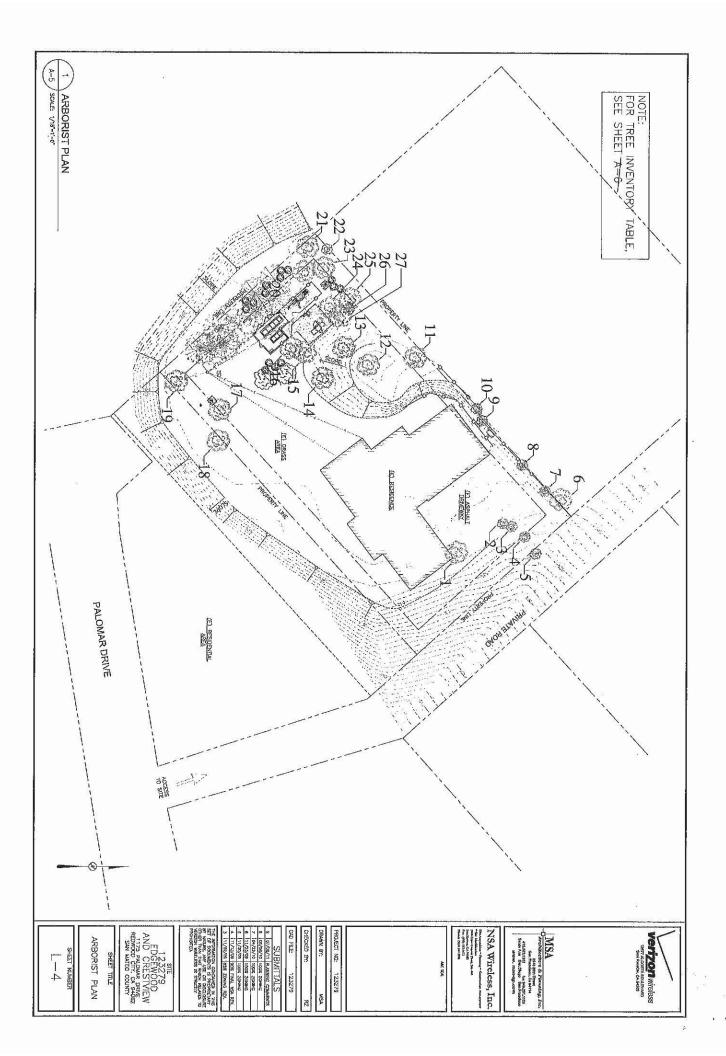
TREE	TREE NAME:	Estimated Trunk Diameter (in.)	Health Condition (100%=Best, 0%=Worst)	Structural Integrity (100%=Best, 0%=Worst)	Overall Condition (Good/Fair/Pool/Dead)	Intensity of Impacts (1=Highest, 5=Lowest):
19	silver-dollar gum	15 14	70%	200/	Fair	
19	(Eucalyptus polyanthemos )  Comments:	15, 14 Beneath high	-voltage elect	30%   rical wires.	rair j	5
<del></del>						
20	Monterey pine (Pinus radiata)	7.5	80%	50%	Fair	2
	W 1856W				beneath surro	- 10 Page 10 P
						-
21	coast live oak (Quercus agrifolia)	14, 11	60%	50%	Fair	4
<u> </u>	Comments:		0070	3070	1 4411	
				3		
22	coast redwood (Sequoia sempervirens)	21	80%	50%	Good	5
	Comments:	<del></del>			3004	
23	Monterey pine (Pinus radiata)	23	60%	75%	Fair	1
2.3	Comments:	23	0076 ]	1370	Tan	
	-			· · · · · · · · · · · · · · · · · · ·	T	
24	Monterey pine (Pinus radiata)	9	50%	50%	Fair	2
L			-voltage elect	· · · · · · · · · · · · · · · · · · ·		
				: * T		
25	Monterey pine ( <i>Pinus radiata</i> )	22	50%	30%	Poor	4
L			-voltage electr		1001	
	Salara Develope and Leaving and		7007,070	30 4 10 17 (N 90 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		/
26	Monterey pine (Pinus radiata)	9.5	50%	30%	Poor 😘	5
			-voltage electr		7	<i>354</i>
			···	o 188	· · · · · · · · · · · · · · · · · · ·	
27	Monterey pine (Pinus radiata)	10.5, 5.5	50%	30%	Poor,	5
		Beneath high	·		1	

Comments: Beneath high-voltage electrical lines.

Project Site: 1175 Palomar Drive, Redwood City; #123279 Prepared for: MSA Architecture Planning, Inc. Prepared by: David L. Babby

**EXHIBIT B:** 

**SITE MAP** 





# EDGEWOOD & CRESTVIEW SITE NAME:

TOTIZOTI wireless

### SITE NUMBER: 123279

3940 20th Street
San Franckco, Ca 94114
415-003-193
418-003-193
Santa Ans San Dago San Francisco
www.msa-ap.com

MSA Architecture & Planning, I

NSA Wireless, Inc.

REDWOOD CITY, CA 94062 1175 PALOMAR DRIVE SAN MATEO COUNTY



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Under ground Service Alert of Central/Northern California

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2. CALFORNIA BULIDING CODES 2010
4. CALFORNIA ELECTRICAL CODES 2010
5. CALFORNIA MECHANICAL CODES 2010
6. ANSI / EM-222 80
7. LOCAL BULIDING CODES
8. CITY / COUNTY ORDINANCES
9. CALFORNIA FIRE CODE 2010 EDITION

CODE COMPLIANCE

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ABBREVIATIONS

PROJECT TEAM

FACILIY IS UNMANNED AND NOT FOR HUMAN HABITATION.
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2010 CALFORNIA BULLINK CODE, TITLE 24, FART 24, VOL. 1,
CHAPTER 118, SECTION 11238.2 EXCEPTION 1 THE PROJECT CONSISTS OF THE INSTALLATION OF A VERIZON WIRELESS EQUIPMENT CABINETS MOUNTED ON A CONCRETE SLAB ON GRADE WITHIN A WOOD FENCE TO MATCH (E) WOOD FENCE. INSTALLATION OF (6) PANEL ANTENIAS MOUNTED ON DIRECT BURIAL (3) 6"X20" PIPES, (2) GPS ANTENIAS MOUNTED ON WOOD FENCE. PAINTED GREEN TO MATCH SURROUNDINGS.

## ACCESSIBILITY REQUIREMENTS

VERIZON WIRELESS
2785 MITCHELL DRIVE
WALNUT CREEK, CA 94598
JIM GRAHAM
(925) 279-6333 APPLICANT/LESSEE
NAME:
ADDRESS: AGENT NAME: ADDRESS: CONTACT: PHONE:

INSTALLATION OF (N) LANDSCAPING FOR EQUIPMENT SCREENING. (E) TREES TO BE REPLACED AS NEIDED, PER ABORIST PROJECT DESCRIPTION

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MAN WINGELESS 2000 CROW CANYON PLACE, STE. 2000 CROW CANYON PLACE, STE. SAN RAWN, CA. 94583 CRO-40-180 (SC) 444-180 (SC) 453-180-180 (SC) SSS-184P - CONST. MANAGER (510) 516-3169

PROPERTY INFORMATION
OWNER: CURTIS I
ADDRESS: 1175 PA

CURTIS L. & ETHEL R. BROOKS 1175 PALOMAR DRIVE REDWOOD CITY, CA 94062 CURTIS L. & ETHEL R. BROOKS (650) 367-8000

83 (LOCATION 1 PER SURVEY) N 37' 28" 41.41" W 122' 16' 44.77" N/A R-1/S-101/DR 051-416-040 TOWER NUMBER: CURRENT ZONING: A.P.N.: NAD: LAT: LONG:

MSA ARCHITECTURE AND PLANNING, INC. 3940. 2011 STREET SAN FRANCISCO, CA 94114 ROBERT ZEHM (415) 503-1363 (949) 251-1120

ARCHITECT:
CONSULTANT'S NAME
ADDRESS
CITY, STATE, ZIP
CONTACT:
PHONE:
FAX:

83 (LOCATION 2 PER SURVEY) N 37 28' 41.16" W 122' 16' 44.57" 83 (LOCATION 3 PER SURVEY) N 37 28" 40.76" W 122" 16" 43.89"

H2WOOD 5164 FRY ROAD VACAVILLE, CA 95687 (707) 448-7332 (707) 448-8190

SURVEYOR; CONSULTANT'S NAME ADDRESS CITY, STATE, ZIP PHONE:

NOTE: NORTH SHOWN HAS BEEN ESTABLISHED USING COMPASS AND IS APPROXIMETE. ALL ANTERNA, AZMUTHS, ARE MAGNETIC NORTH, MAGNETIC DEVATION HAS NOT BEEN ACCOUNTED FOR. YERRY TRUE NORTH PROR TO INSTALLATION OF AMERINAS. PROJECT SUMMARY

DRIVING DIRECTIONS

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OFFICE:
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DIRECTIONS FROM VERIZON WIRELESS WALNUT CREEK OFFICE.

THE INFORMATION CONTAINED IN THIS SET OF DOCUMENTS IS PROPRIETARY BY UNLURE, ANY USE OR BISCLOSURE OTHER THAN THICH RELEAS TO PROHIBITED.

123279 EDGEWOOD AND CRESTVIEW REDWOOD GITY, CA REDWOOD GITY, CA SAN MATEO COUNTY

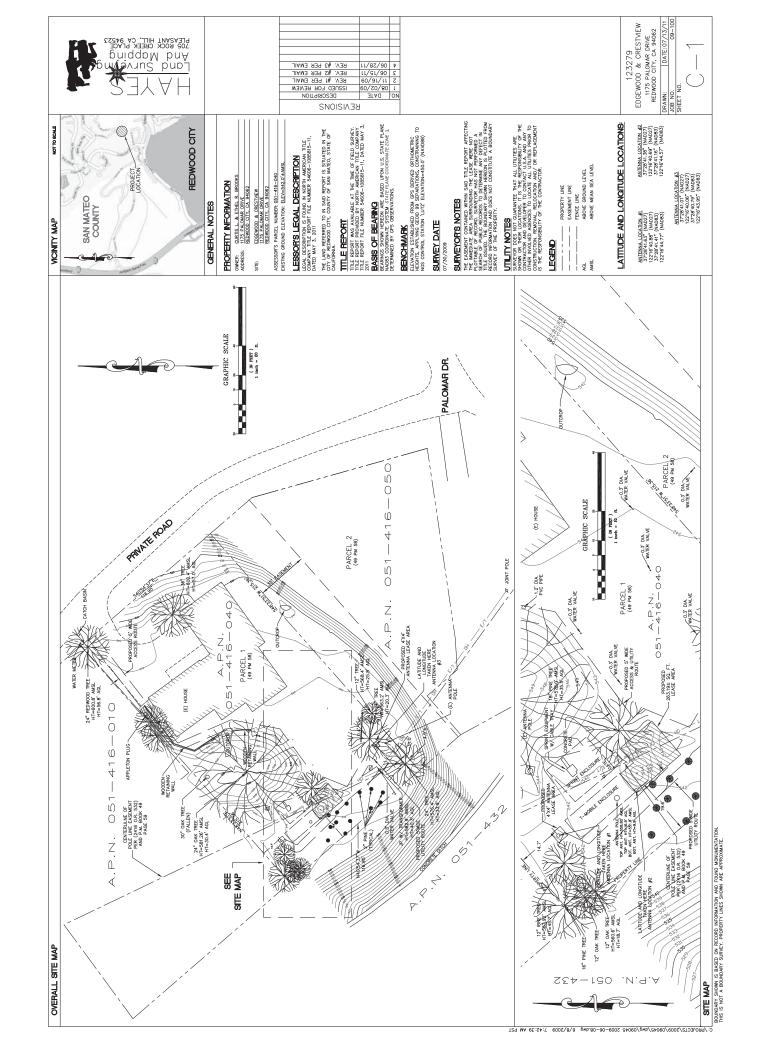
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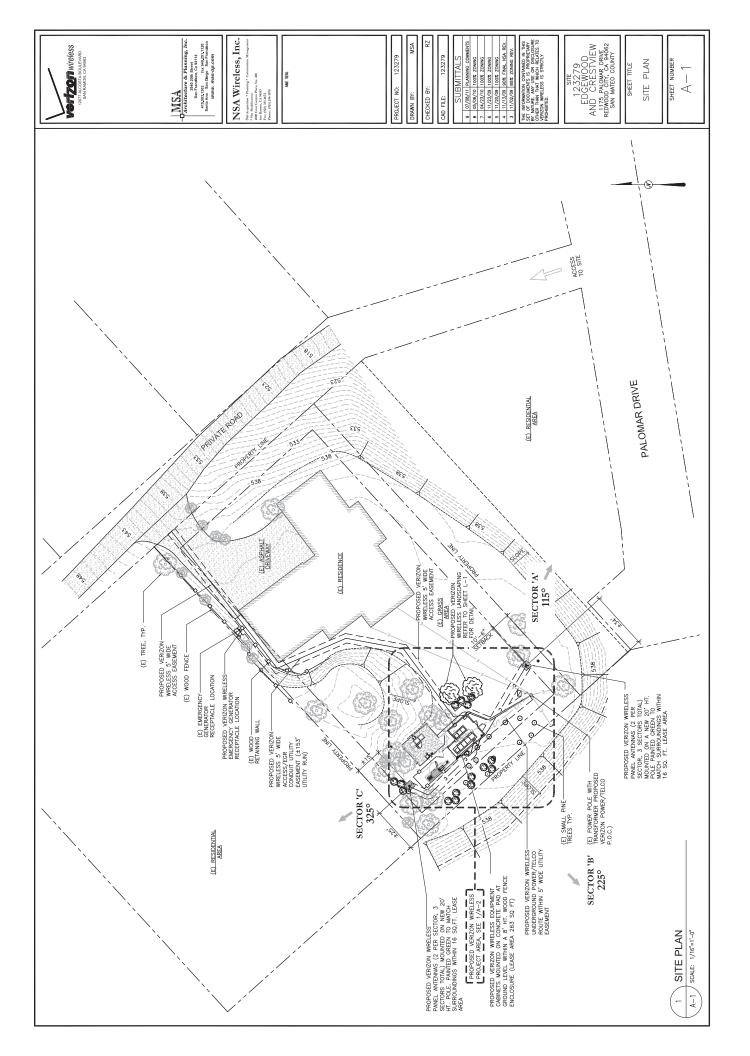
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04/23/10 10:00X ZONING
11/23/09 10:00X ZONING
11/20/09 10:00X ZONING
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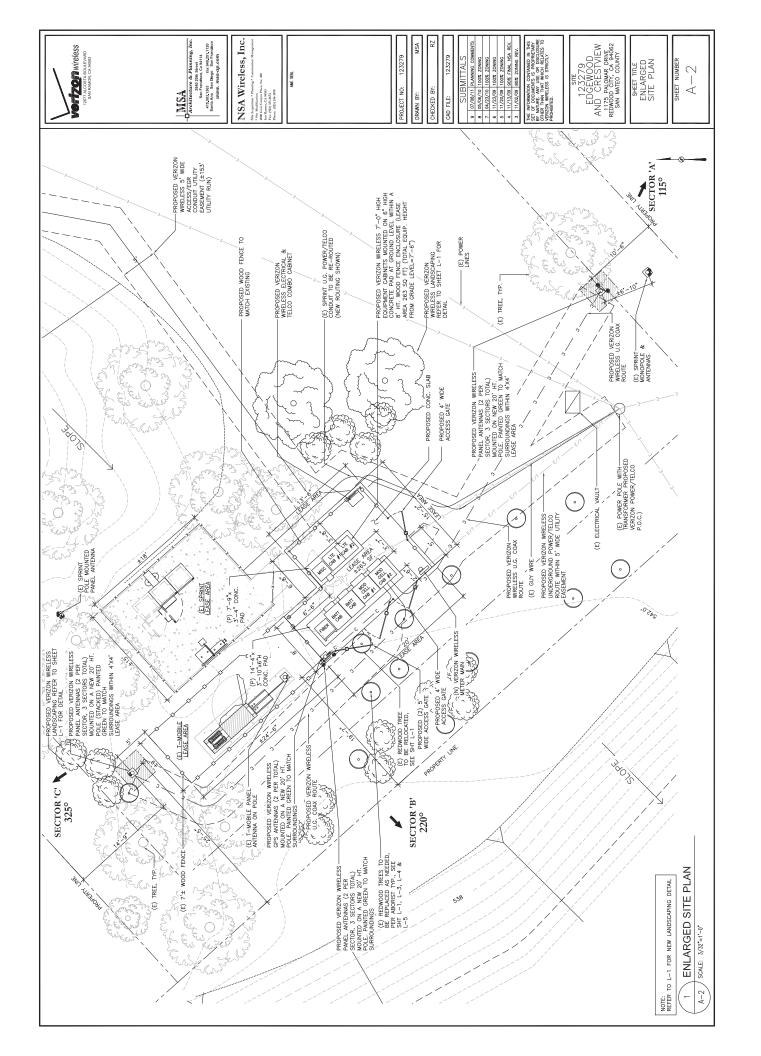
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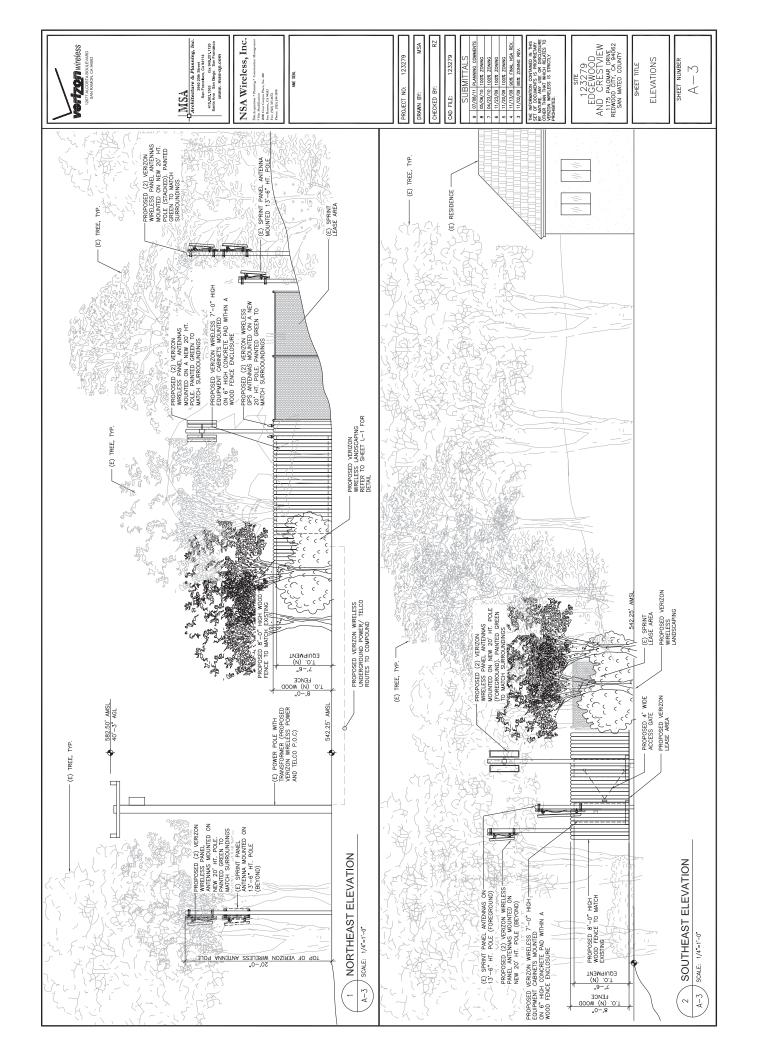
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4	F-1	LANDSCAPE PLANS	
	۲2	IRRIGATION PLAN	
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	1-5	ARBORIST DETAILS	
	EC-1	EROSION CONTROL PLAN	
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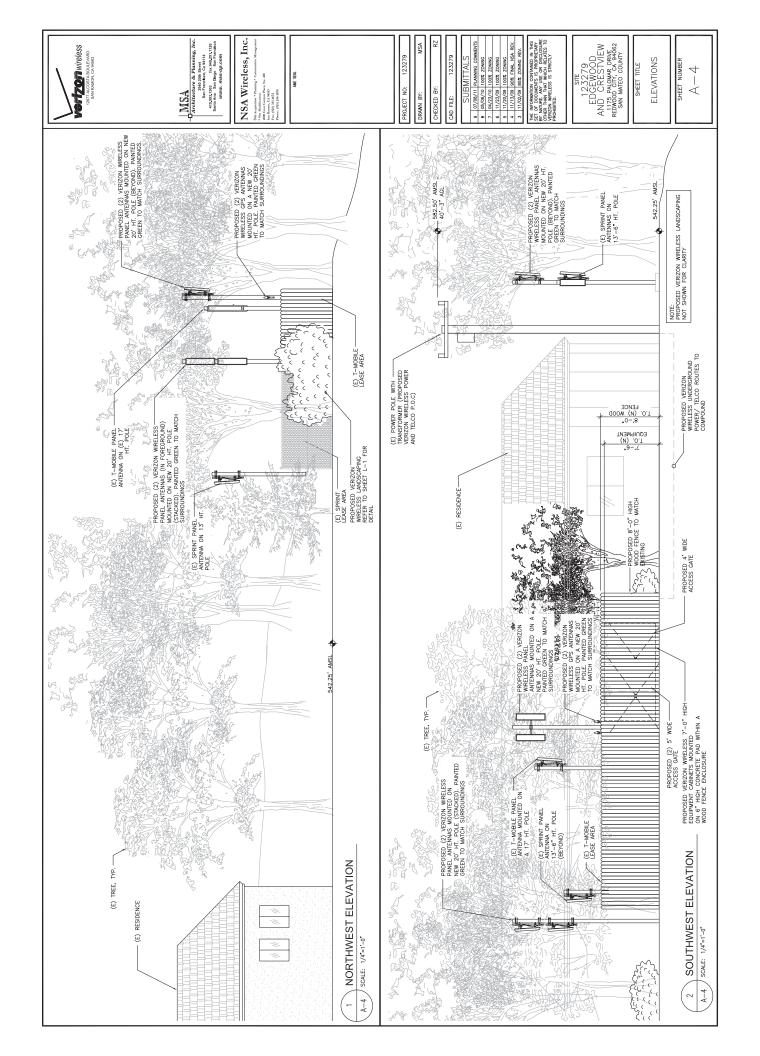
Attachment F of IS/MND

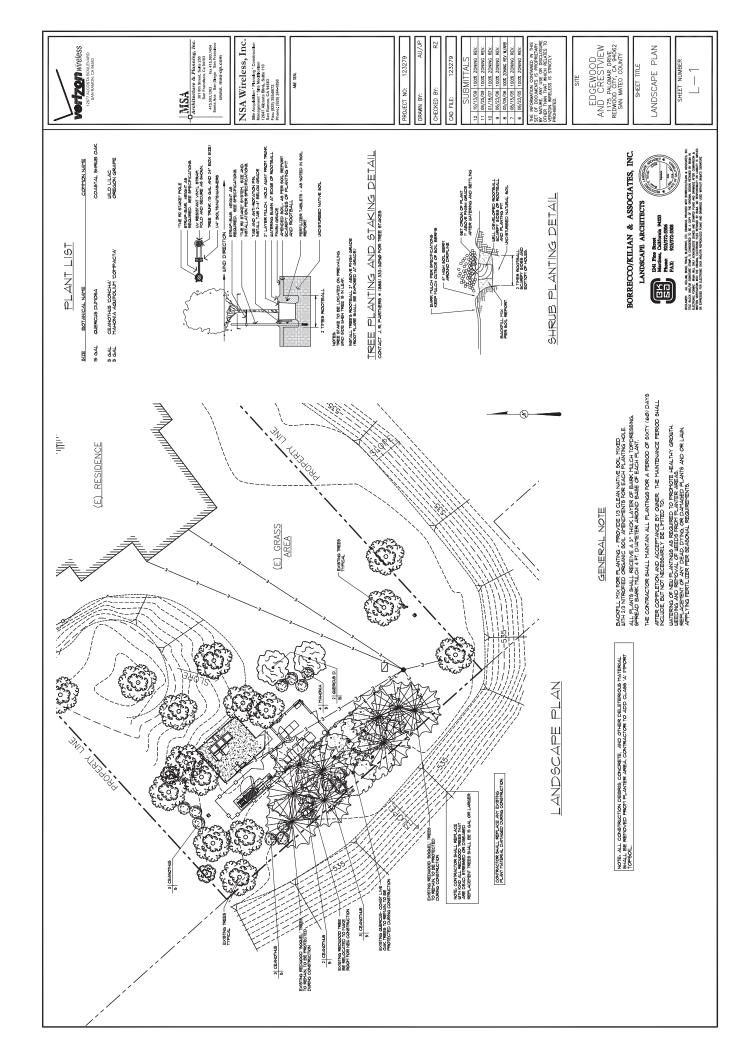


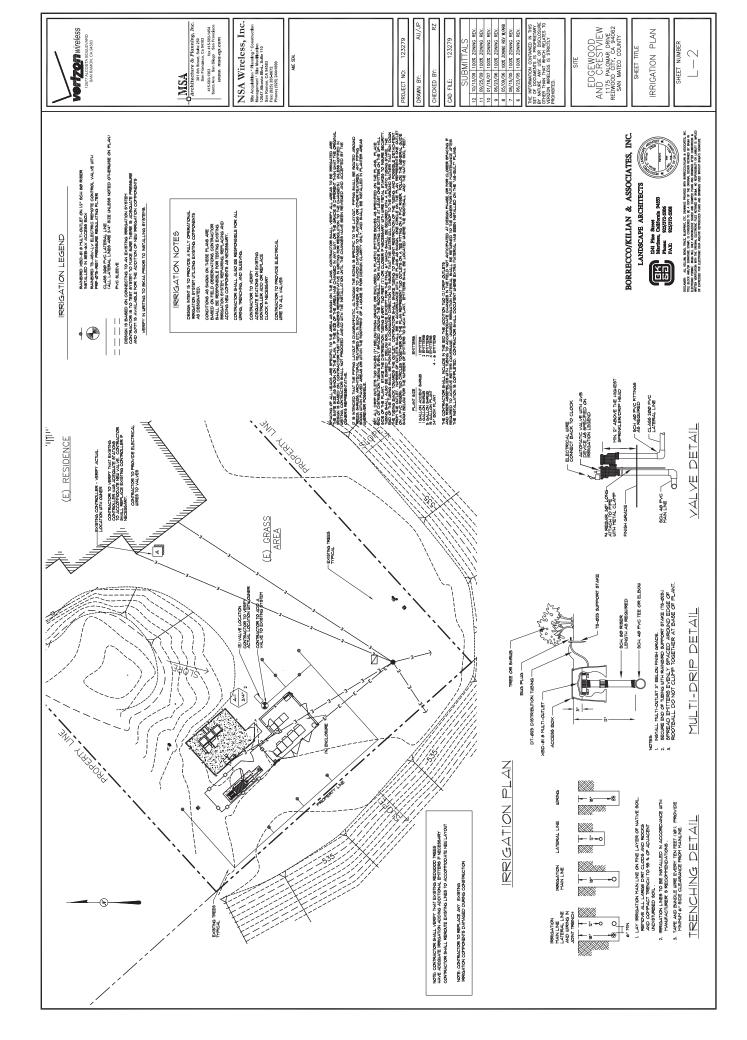


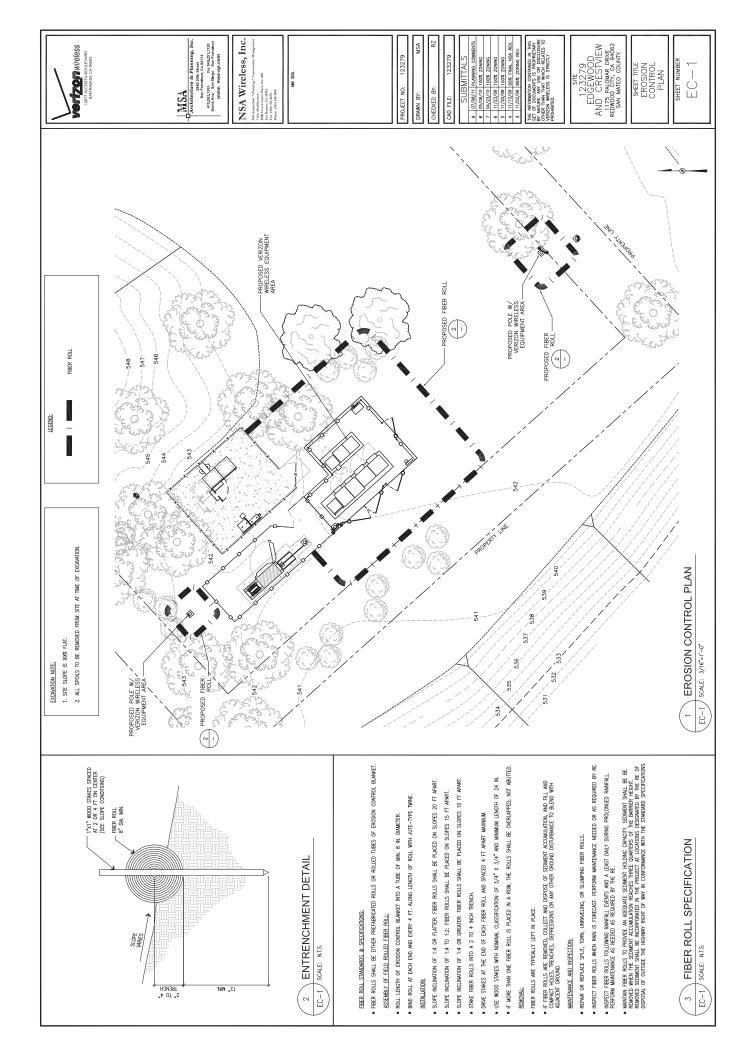


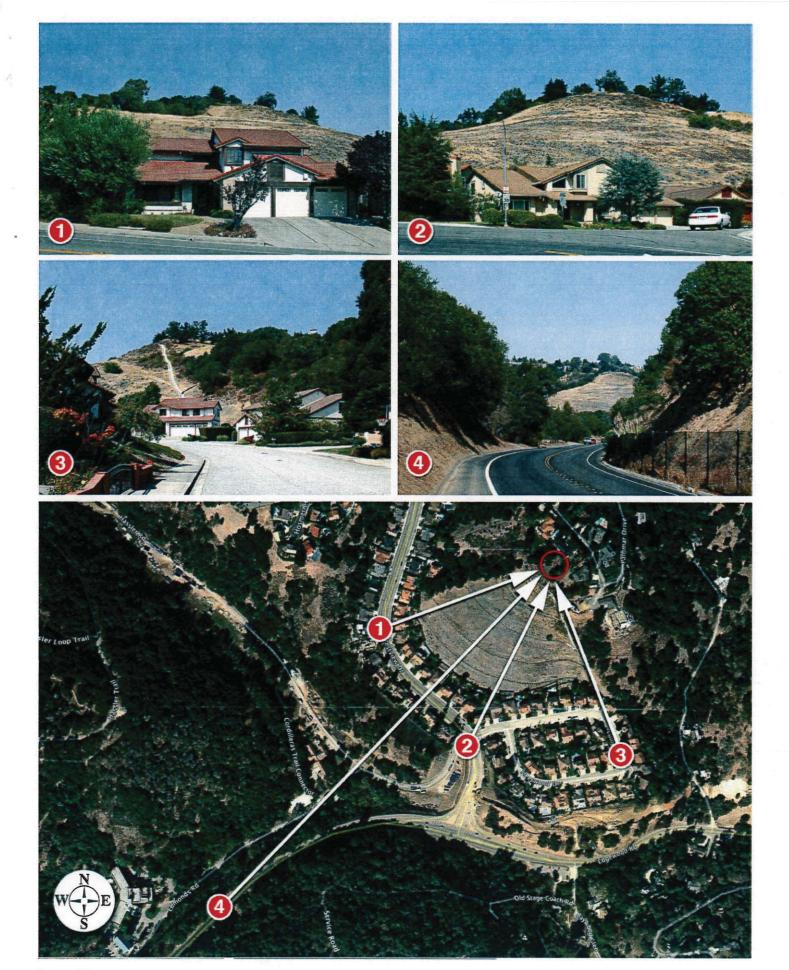




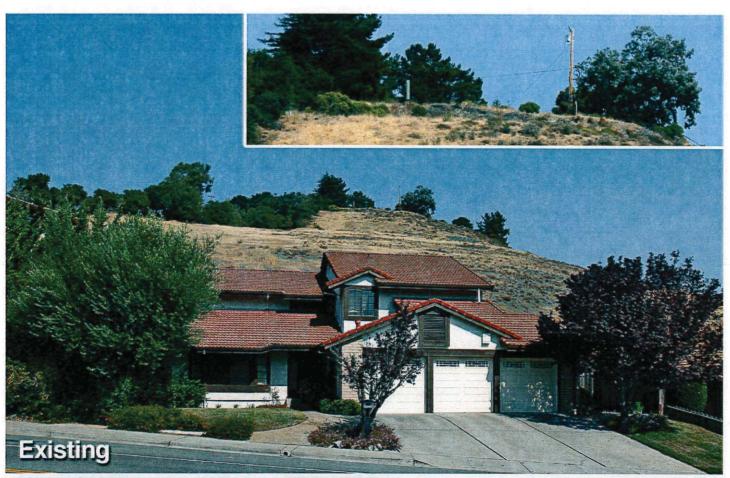


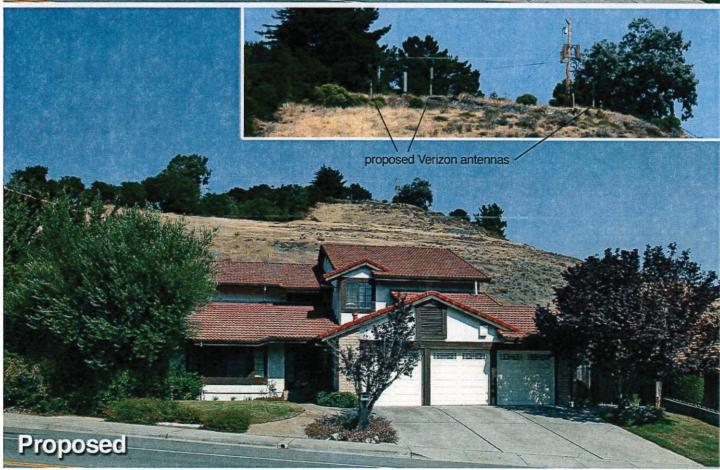




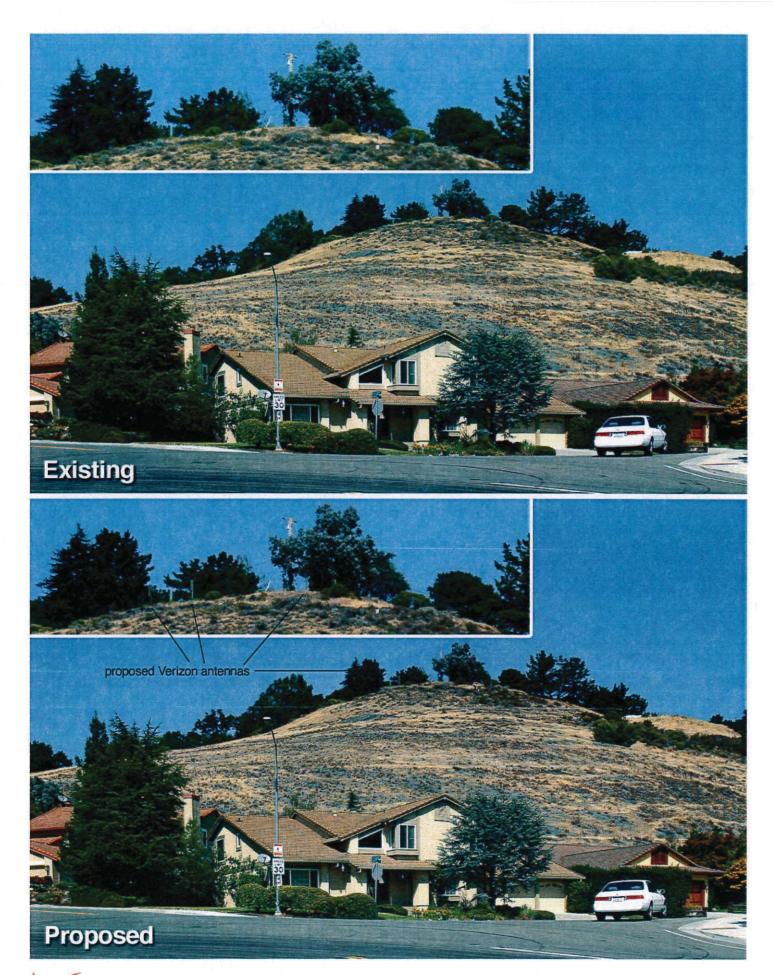




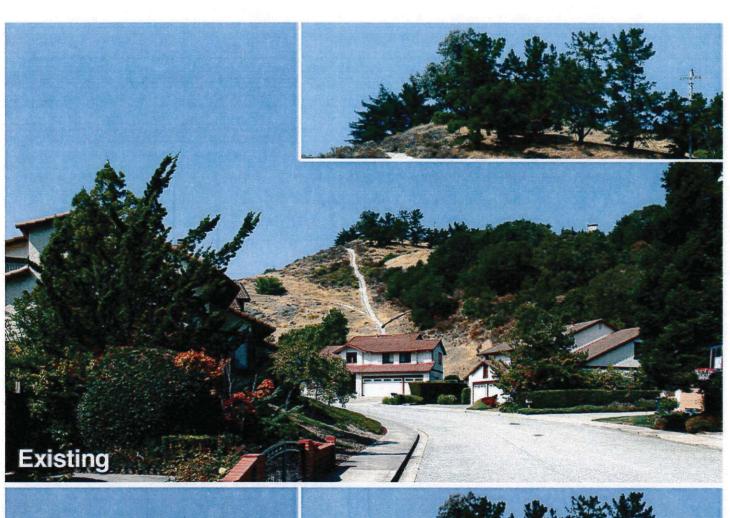


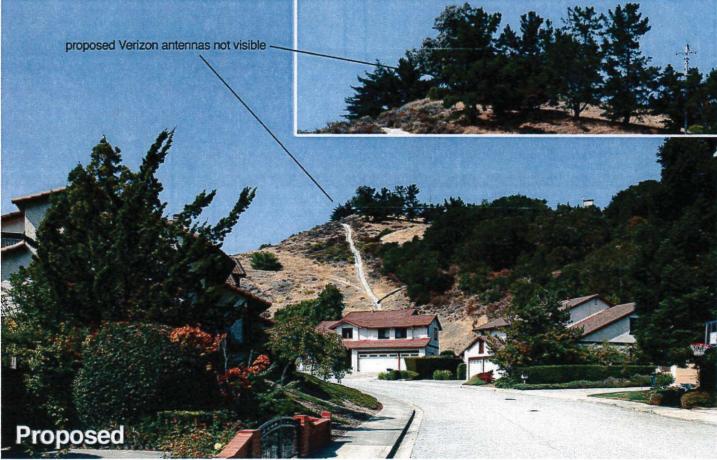


















## Attachment H of IS/MIND



OF CENTRAL/NORTHERN CALIFORNIA

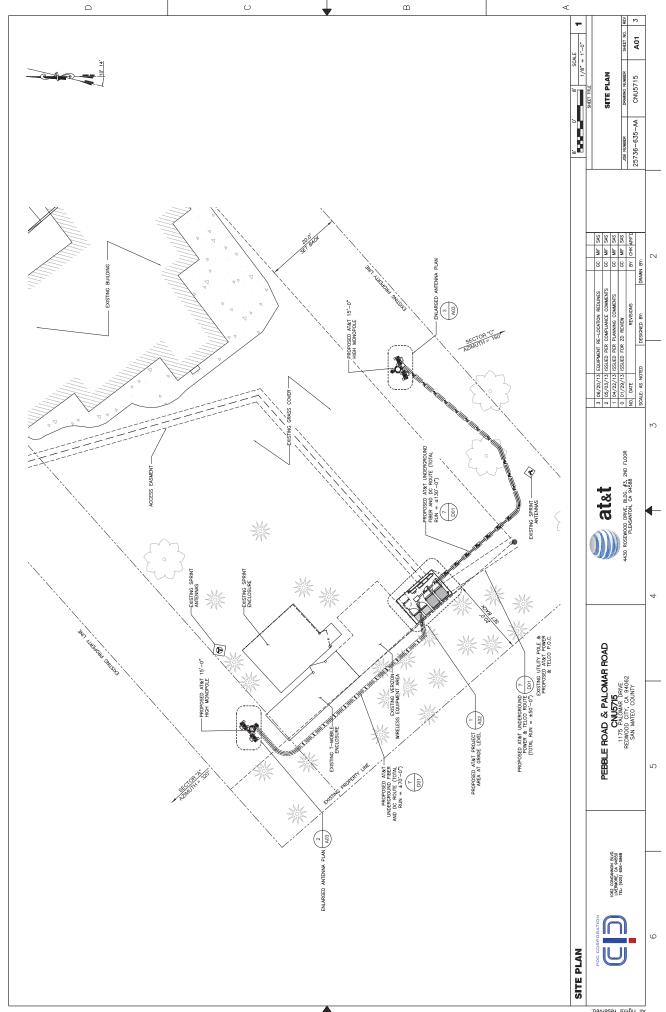
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AT LEAST TWO WORKING
DAYS BEFORE YOU DIG

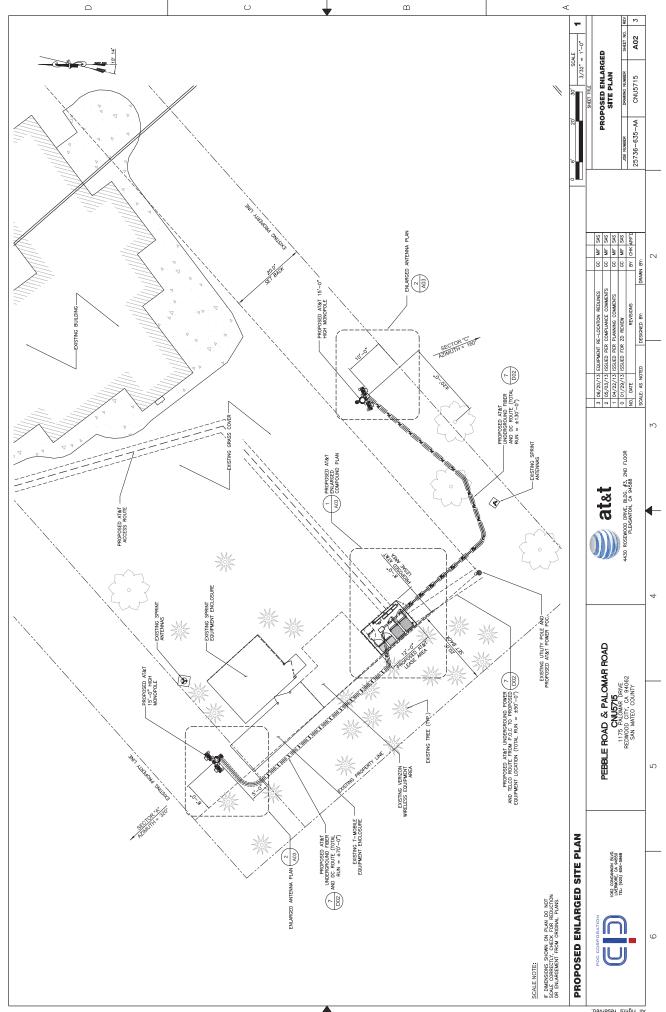
#### Acceptance does not constitute approval of design details, calculations, analysis, test methods or materials developed or selected by the subcontractor and does not relieve subcontractor from full compliance obligations. Not Accepted - Please resolve comments and resubmit థ A/E DOCUMENT REVIEW STATUS Accepted - With minor or no comments, construction may proceed ENG CONST COMPLIANCE Date Status Code Reviewed Status By

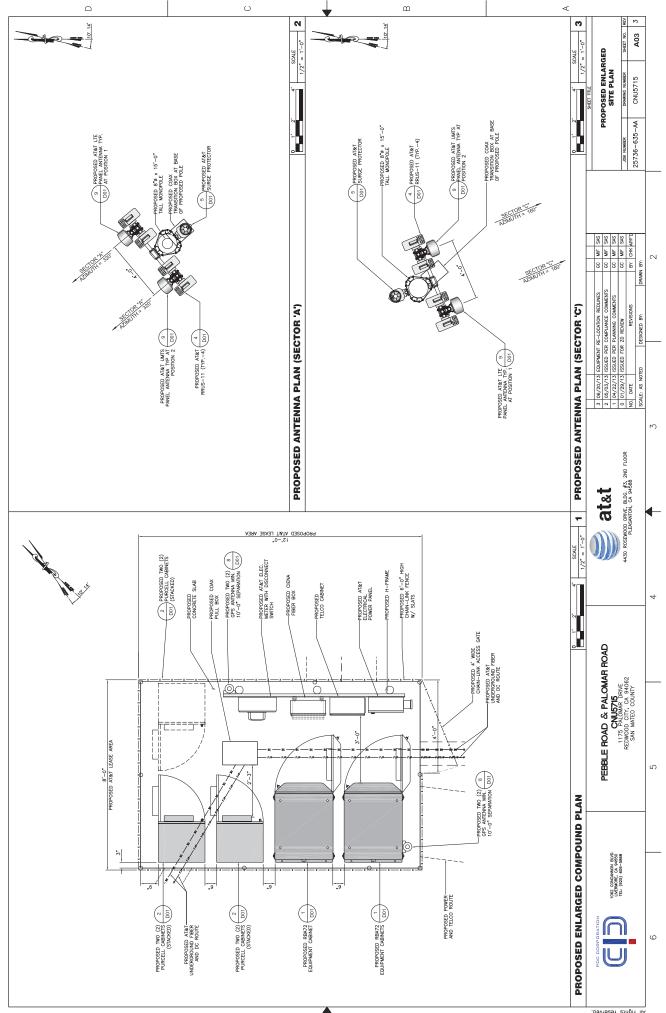
SITE NAME: PEBBLE ROAD & PALOMAR ROAD SITE NUMBER: CNU5715

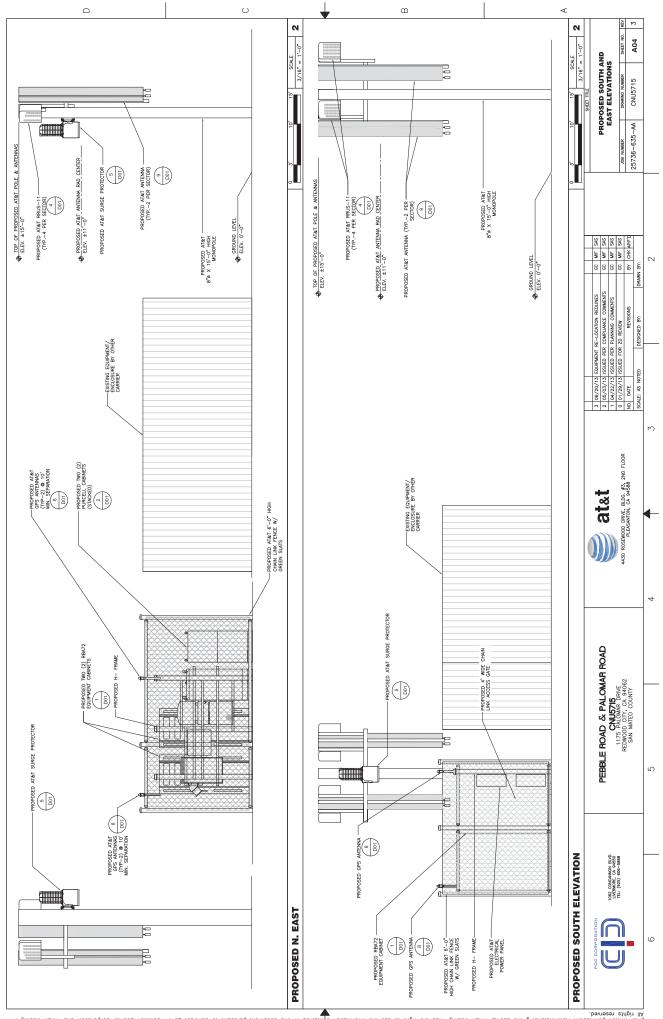
REDWOOD CITY, CA 94062 1175 PALOMAR DRIVE

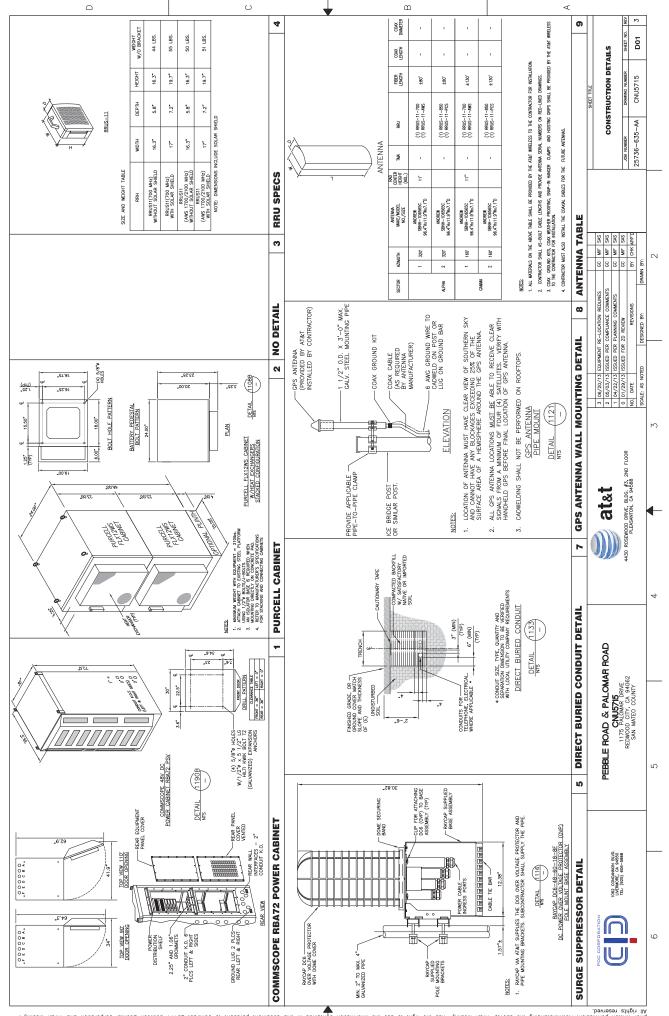
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PROJECT DESCRIPTION	THIS IS AN APPLICATION FOR A NEW, UNMANNED ATAST SERVICES FACULTY, CONSISTING OF THE INSTALLATION AND OPERATION OF ANTENINAS AND ASSOCIATED EQUIPMENT ATAST IS PROPOSING TO INSTALL OUTDOOR EQUIPMENT ON GROUND LENEL, FOUR (4) PANEL MEMINES ARE TO BE INSTALLED ON PROPOSED MANOPLEZES, EDIN (16) MONO REMORE LUNK (RRIGE-11). AND THO (2) SHARE PROPOSING DIN ADDITIONS, AND THO (2) GAS ANTENINGS.	PROJECT INFORMATION	1175 PALOMAR DRIVE RETWOOD CITY, CA 94062 CURTEL BROOKS RETRY SHOWED DRIVE RESPONDED THE A 94062 A 7400 RESERVOOD DRIVE, BLDC. 3 FLESANTON, CA 94068 RESPONDED TO 1000 RESPOND	/ 122' 16' 43.54" W (NAVD 88)	±15' AGL ±15' AGL	COUNTY OF SAN MATEO 051-416-040 R10510	12'-0" X 8'-0" TELECOMMUNICATIONS FACILITY	SITE QUALIFICATION PARTICIPANT	NAME SOHAL A, SHAH (EOR) PDC		ROBERT PUNSALANG AT&T TOM JOHNSON TRILL	CURTIS L. BROOKS		GC MIF SAS BY CHK APP'D 255 DRAWN BY:
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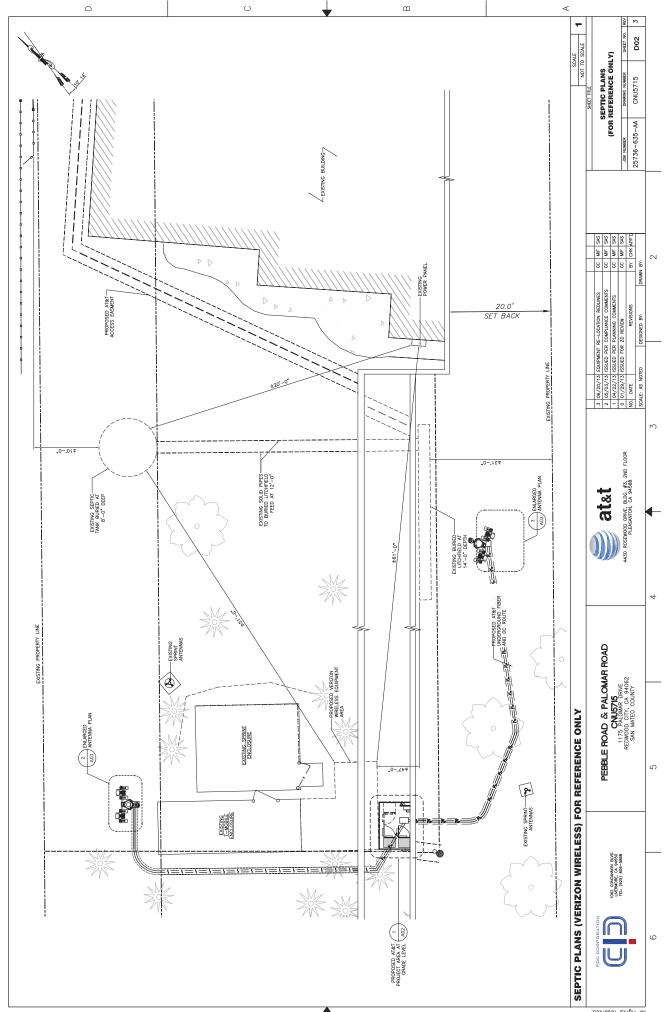








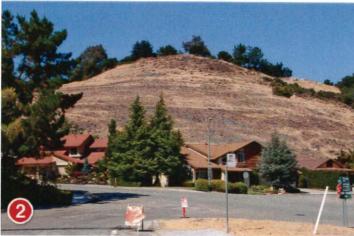




#### Attachment I of IS/MND

Note: AT&T has not provided visual simulations matching its most current proposal shown in Attachment H. These simulations are based on an earlier proposal involving no new poles and antennas on an existing utility pole.





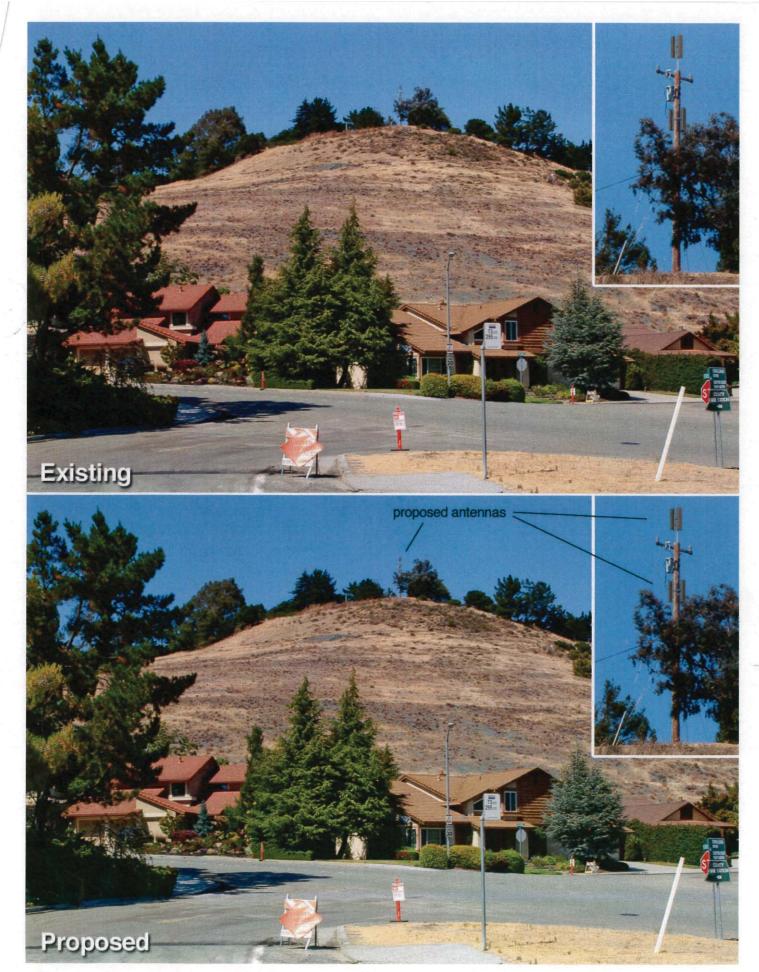


Redwood City, CA 94082











#### Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of Verizon Wireless and AT&T Mobility, personal wireless telecommunications carriers, to evaluate this base station expansion (Proposed Site No. 123279 "Edgewood & Crestview" for Verizon and proposed Site No. CNU5715 for AT&T) at 1175 Palomar Drive in Redwood City, California, for compliance with appropriate guidelines limiting human exposure to radio frequency ("RF") electromagnetic fields.

### **Executive Summary**

Verizon and AT&T propose to install directional panel antennas on two new steel poles to be sited behind the residence located at 1175 Palomar Drive in Redwood City. The proposed operations will, together with the existing base stations at the site, comply with the FCC guidelines limiting public exposure to RF energy.

#### **Prevailing Exposure Standards**

The U.S. Congress requires that the Federal Communications Commission ("FCC") evaluate its actions for possible significant impact on the environment. A summary of the FCC's exposure limits is shown in Figure 1. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health. The most restrictive FCC limit for exposures of unlimited duration to radio frequency energy for several personal wireless services are as follows:

Wireless Service	Frequency Band	Occupational Limit	Public Limit
	5,000–80,000 MHz	5.00 mW/cm <sup>2</sup>	1.00 mW/cm <sup>2</sup>
BRS (Broadband Radio)	2,600	5.00	1.00
WCS (Wireless Communication	2,300	5.00	1.00
AWS (Advanced Wireless)	2,100	5.00	1.00
PCS (Personal Communication)	1,950	5.00	1.00
Cellular	870	2.90	0.58
SMR (Specialized Mobile Radio	855	2.85	0.57
700 MHz	700	2.40	0.48
[most restrictive frequency range	e] 30–300	1.00	0.20

#### **General Facility Requirements**

Base stations typically consist of two distinct parts: the electronic transceivers (also called "radios" or "channels") that are connected to the traditional wired telephone lines, and the passive antennas that send the wireless signals created by the radios out to be received by individual subscriber units. The transceivers are often located at ground level and are connected to the antennas by coaxial cables. A



small antenna for reception of GPS signals is also required, mounted with a clear view of the sky. Because of the short wavelength of the frequencies assigned by the FCC for wireless services, the antennas require line-of-sight paths for their signals to propagate well and so are installed at some height above ground. The antennas are designed to concentrate their energy toward the horizon, with very little energy wasted toward the sky or the ground. This means that it is generally not possible for exposure conditions to approach the maximum permissible exposure limits without being physically very near the antennas.

### **Computer Modeling Method**

The FCC provides direction for determining compliance in its Office of Engineering and Technology Bulletin No. 65, "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radio Frequency Radiation," dated August 1997. Figure 2 describes the calculation methodologies, reflecting the facts that a directional antenna's radiation pattern is not fully formed at locations very close by (the "near-field" effect) and that at greater distances the power level from an energy source decreases with the square of the distance from it (the "inverse square law"). The conservative nature of this method for evaluating exposure conditions has been verified by numerous field tests.

### **Site and Facility Description**

Based upon information provided by Verizon, including zoning drawings by Connell Design Group, LLC, dated December 29, 2014, that carrier proposes to install six Andrew directional panel antennas – three Model DBXNH-6565A-VTM and three Model LNX-6513DS-VTM – on a new 25-foot steel pole, configured to resemble a broadleaf tree, to be sited behind the residence located at 1175 Palomar Drive in Redwood City. The antennas would be mounted with up to 3° downtilt\* at an effective height of about 22 feet above ground and would be oriented in pairs toward 145°T, 225°T, and 325°T. The maximum effective radiated power in any direction would be 11,200 watts, representing simultaneous operation at 3,330 watts for AWS, 3,750 watts for PCS, 2,170 watts for cellular, and 1,950 watts for 700 MHz service.

Based upon information provided by AT&T, including zoning drawings by Connell Design Group, LLC, dated August 14, 2014, that carrier proposes to install six CCI OPA-65R-LCUU-H6 directional panel antennas on a second new 25-foot steel pole, configured to resemble a broadleaf tree, to be sited about 20 feet east of the proposed Verizon pole. The antennas would be installed with up to 6° downtilt in the PCS, AWS, and WCS frequency bands and with up to 12° downtilt in the 700 MHz and cellular bands. The antennas would be mounted at an effective height of about 22 feet above ground and oriented in pairs toward 130°T, 225°T and 320°T. The maximum effective radiated power

<sup>\*</sup> Assumed for the purposes of this study.



HAMMETT & EDISON, INC. CONSULTING ENGINEERS

in any direction would be 12,100 watts, representing simultaneous operation at 3,050 watts for WCS, 3,220 watts for AWS, 3,230 watts for PCS, 1,000 watts for cellular, and 1,600 watts for 700 MHz service.

Located on other poles at the site are similar antennas for use by MetroPCS, Sprint, and T-Mobile. For the limited purpose of this study, the transmitting facilities of those carriers are assumed to be as follows:

Operator	Service	Maximum ERP	Antenna Model	Downtilt	Height
Sprint	PCS	1,000 watts	Andrew FR9016-DP	4°	13 ft
T-Mobile	PCS	255	RFS APXV18-206516	0	$14\frac{1}{2}$
MetroPCS	PCS	1,890	Allgon 7721	0	13

#### **Study Results**

For a person anywhere at ground, the maximum RF exposure level due to the proposed Verizon operation by itself is calculated to be 0.092 mW/cm<sup>2</sup>, which is 17% of the applicable public exposure limit and the maximum RF exposure level due to the proposed AT&T operation by itself is calculated to be 0.37 mW/cm<sup>2</sup>, which is 39% of the applicable public limit. The maximum calculated cumulative level at ground, for the simultaneous operation of all five carriers, is 50% of the public exposure limit. The maximum calculated cumulative level at the second-floor elevation of any nearby residence<sup>†</sup> is 38% of the public exposure limit. It should be noted that these results include several "worst-case" assumptions and therefore are expected to overstate actual power density levels.

#### **No Recommended Mitigation Measures**

Due to their mounting locations, the Verizon and AT&T antennas would not be accessible to the general public, and so no mitigation measures are necessary to comply with the FCC public exposure guidelines. It is presumed that the several carriers will, as FCC licensees, take adequate steps to ensure that their employees or contractors receive appropriate training and comply with FCC occupational exposure guidelines whenever work is required near the antennas themselves.

#### Conclusion

Based on the information and analysis above, it is the undersigned's professional opinion that the base station expansion proposed by Verizon Wireless and AT&T Mobility at 1175 Palomar Drive in Redwood City, California, will comply with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the

<sup>†</sup> Including the houses on adjacent parcels, based on photographs from Google Maps.



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environment. The highest calculated level in publicly accessible areas is less than the prevailing standards allow for exposures of unlimited duration. This finding is consistent with measurements of actual exposure conditions taken at other operating base stations.

#### **Authorship**

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration No. E-20309, which expire on March 31, 2015. This work has been carried out under her direction, and all statements are true and correct of her own knowledge except, where noted, when data has been supplied by others, which data she believes to be correct.

E 20309

Exp. 3-31-2015

Andrea L. Bright, P.E.

707/996-5200

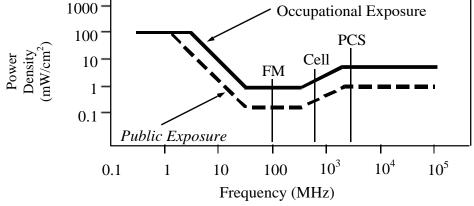
February 4, 2015

#### **FCC Radio Frequency Protection Guide**

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The FCC adopted the limits from Report No. 86, "Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields," published in 1986 by the Congressionally chartered National Council on Radiation Protection and Measurements ("NCRP"). Separate limits apply for occupational and public exposure conditions, with the latter limits generally five times more restrictive. The more recent standard, developed by the Institute of Electrical and Electronics Engineers and approved as American National Standard ANSI/IEEE C95.1-2006, "Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz," includes similar limits. These limits apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

As shown in the table and chart below, separate limits apply for occupational and public exposure conditions, with the latter limits (in *italics* and/or dashed) up to five times more restrictive:

Frequency	Electro	magnetic F	ields (f is fr	requency of	emission in	MHz)	
Applicable Range (MHz)	Field S	Electric Field Strength (V/m)		Magnetic Field Strength (A/m)		Equivalent Far-Field Power Density (mW/cm <sup>2</sup> )	
0.3 - 1.34	614	614	1.63	1.63	100	100	
1.34 - 3.0	614	823.8/f	1.63	2.19/f	100	$180/f^2$	
3.0 - 30	1842/ f	823.8/f	4.89/ f	2.19/f	$900/ f^2$	$180/f^2$	
30 - 300	61.4	27.5	0.163	0.0729	1.0	0.2	
300 - 1,500	3.54√f	1.59√f	$\sqrt{f}/106$	$\sqrt{f/238}$	f/300	f/1500	
1,500 - 100,000	137	61.4	0.364	0.163	5.0	1.0	



Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits, and higher levels also are allowed for exposures to small areas, such that the spatially averaged levels do not exceed the limits. However, neither of these allowances is incorporated in the conservative calculation formulas in the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) for projecting field levels. Hammett & Edison has built those formulas into a proprietary program that calculates, at each location on an arbitrary rectangular grid, the total expected power density from any number of individual radio sources. The program allows for the description of buildings and uneven terrain, if required to obtain more accurate projections.



## RFR.CALC<sup>™</sup> Calculation Methodology

#### Assessment by Calculation of Compliance with FCC Exposure Guidelines

The U.S. Congress required (1996 Telecom Act) the Federal Communications Commission ("FCC") to adopt a nationwide human exposure standard to ensure that its licensees do not, cumulatively, have a significant impact on the environment. The maximum permissible exposure limits adopted by the FCC (see Figure 1) apply for continuous exposures from all sources and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health. Higher levels are allowed for short periods of time, such that total exposure levels averaged over six or thirty minutes, for occupational or public settings, respectively, do not exceed the limits.

#### Near Field.

Prediction methods have been developed for the near field zone of panel (directional) and whip (omnidirectional) antennas, typical at wireless telecommunications base stations, as well as dish (aperture) antennas, typically used for microwave links. The antenna patterns are not fully formed in the near field at these antennas, and the FCC Office of Engineering and Technology Bulletin No. 65 (August 1997) gives suitable formulas for calculating power density within such zones.

For a panel or whip antenna, power density  $S = \frac{180}{\theta_{BW}} \times \frac{0.1 \times P_{net}}{\pi \times D \times h}$ , in mW/cm<sup>2</sup>,

and for an aperture antenna, maximum power density  $S_{max} = \frac{0.1 \times 16 \times \eta \times P_{net}}{\pi \times h^2}$ , in  $mW/cm^2$ ,

where  $\theta_{BW}$  = half-power beamwidth of the antenna, in degrees, and

P<sub>net</sub> = net power input to the antenna, in watts,

D = distance from antenna, in meters,

h = aperture height of the antenna, in meters, and

 $\eta$  = aperture efficiency (unitless, typically 0.5-0.8).

The factor of 0.1 in the numerators converts to the desired units of power density.

#### Far Field.

OET-65 gives this formula for calculating power density in the far field of an individual RF source:

power density 
$$S = \frac{2.56 \times 1.64 \times 100 \times RFF^2 \times ERP}{4 \times \pi \times D^2}$$
, in mW/cm<sup>2</sup>,

where ERP = total ERP (all polarizations), in kilowatts,

RFF = relative field factor at the direction to the actual point of calculation, and

D = distance from the center of radiation to the point of calculation, in meters.

The factor of 2.56 accounts for the increase in power density due to ground reflection, assuming a reflection coefficient of 1.6 ( $1.6 \times 1.6 = 2.56$ ). The factor of 1.64 is the gain of a half-wave dipole relative to an isotropic radiator. The factor of 100 in the numerator converts to the desired units of power density. This formula has been built into a proprietary program that calculates, at each location on an arbitrary rectangular grid, the total expected power density from any number of individual radiation sources. The program also allows for the description of uneven terrain in the vicinity, to obtain more accurate projections.

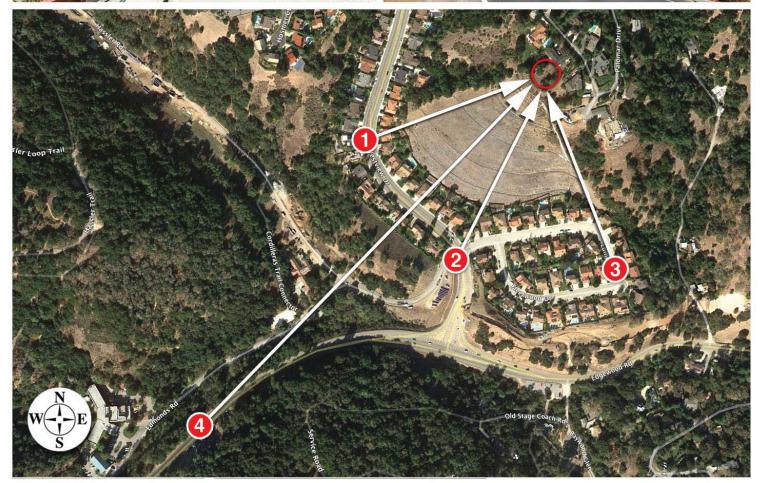












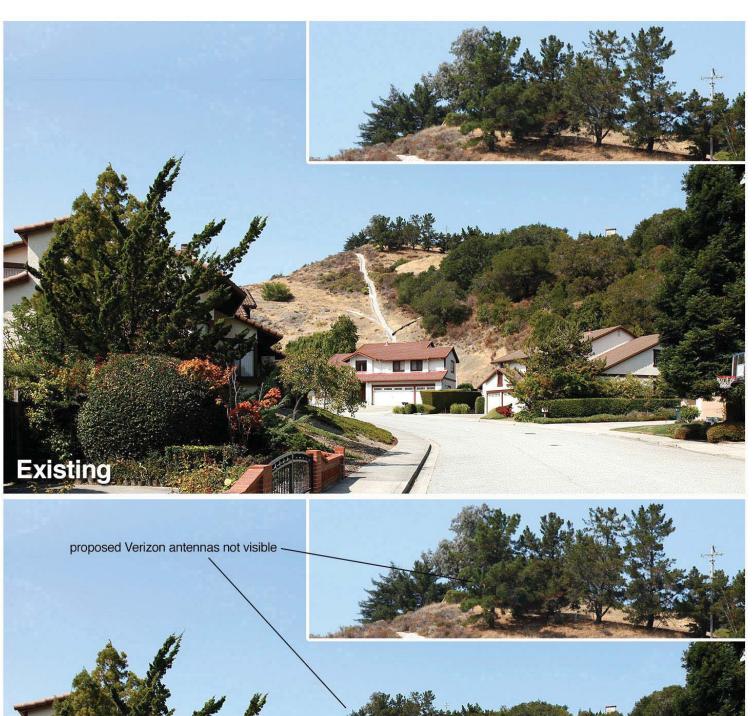






View #1















Verizon Wireless 2785 Mitchell Dr. Bldg. 9 Walnut Creek, CA 94598

January 5, 2015

Camille Leung San Mateo County Planning 455 County Center Redwood City, CA 94063 (650) 599-7311

RE: RF information for re-submittal of Case No.:PLN2005-00801.

Ms. Leung:

As Radio Engineer for the Proposed Verizon Project located at 1175 Palomar Drive, I am familiar with the location of the proposed antennas site. I have provided a coverage map that shows our coverage objectives.

I have also reviewed the Palomar Property Owner of Alternative sites in the area. Below are response for each on why they are not viable alternatives for Verizon:

- Water Tower 1 in Pulgas Ridge Park –
   Location is not suitable to provide coverage for residents in area of Edgewood and Crestview without creating severe interference to the entire peninsular towards the Bay.
- Water Tower 2 above cordilleras Mental Health Center –
   Due to hilly terrain, this location will only provide slight improvement on
   Edgewood Road and does not provide sufficient coverage for residents on the hills to the northeast and southwest.
- Water Tank 3, 602 Glennlock –
   This area is too far south to meet desired coverage objective.
- Co-located site in the SF water District right of way, Edgewood and Crest view –
   Will not meet coverage objective
- Small Cell on a utility pole on Edgewood Drive –
   Small cell does not provide sufficient coverage to meet coverage objective.

I will be available at the hearing to answer any further questions about the coverage objectives. Thank you.

Sincerely,

Brian Ung Radio Engineer Verizon Wireless

(925) 279-6348

Brian.Ung@verizonwireless.com

February 10, 2014

Camille Leung Project Planner San Mateo County Planning and Building Department 455 County Center, Second Floor Redwood City, CA

RE: Mitigated Negative Declaration, File No. PLN 2005-00306, New Verizon and AT&T Wireless Telecommunications Facilities at the Brooks Residential Property

Dear Ms. Leung,

The following comments on the proposed Mitigated Negative Declaration for the proposed wireless telecommunications facilities at 1175 Palomar Park are divided into three sections: Whether an EIR or Mitigated Negative Declaration is Required, the Inadequacy of the Mitigated Negative Declaration and Need to Amend and Reissue, and Specific Corrections and Comments on the Discussion or Mitigations Proposed.

# I. Whether An EIR or Mitigated Negative Declaration is Required The Initial Study/Mitigated Negative Declaration (the "document") explains:

if there are one or more "Potentially Significant Impact" entries when the determination [that a particular physical impact may occur], an EIR is required. A "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level." (pp 3-4, emphasis added.)

The county has sought to fulfill the California Environmental Quality Act (CEQA) requirements by defining and incorporating mitigation where a potentially significant problem has been identified. Almost all of the document has done this successfully. However, with regard to its discussion of land use and planning, the county does not properly identify and require specific mitigations. (see pages 25-27) First the county document correctly states that the proposed project has significant impacts and conflicts with General Plan Policy 4.27 (Ridgelines and Skylines) unless the number of new poles is reduced to three and tree forms are used. The Mitigated Negative Declaration states that "the construction of 3 new poles that are camouflaged in tree-like forms would blend with the existing ridgeline silhouette and forested environment and would mitigate conflict with" policy 4.27 and that "the construction of more than 3 of these tree-like forms could reduce their camouflaging effect....increasing visual impacts." Tree forms have been

used for years now by carriers and we know these are technically feasible, and Mitigation 11b sets forth the requirement to use treeforms.

However, Mitigation 11c is flawed as stated. It now reads:

Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11b in order to minimize scenic impact, unless doing so would directly result in a gap in service, in which case alternative means of reducing scenic impact shall be proposed and implemented, subject to the approval of the Community Development Director. (pp. 26-7)

If the sentence above had stopped with "scenic impact" in line 3, then the document could claim to have mitigated impacts with specific requirements and an EIR would not be required. But, by adding the last three lines above, a way of avoiding this mitigation is introduced and no specific alternative means of reducing impact are adopted. CEQA does not allow the lead agency to identify a potentially significant impact, and then punt its mitigation to reduce it to a level of less than significant to a future Community Development Director. Without specific required measures the County cannot legally find that "the environmental impact of the project is less than significant", and a full Environmental Impact Report would be required. Punting unspecified future screening measures to the Community Development Director is not good enough, particularly in light of the long history of unenforced landscaping plans, dead trees, inadequate irrigation and limited physical space. Either the county needs to require the applicant to fund a third-party consultant to prepare a full EIR under county direction, OR the mitigation 11c needs to be changed to read

Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11b in order to minimize scenic impact.

Given the discussion on pages 25-27, it seems as if the county may have added the problematic final lines without recognizing how they would invalidate the Mitigated Negative Declaration as an adequate CEQA document. They should be removed.

# II. Inadequacy of the Mitigated Negative Declaration and Need to Amend and Reissue

The California Environmental Quality Act of 1970 (CEQA) requires the agency to evaluate all reasonably foreseeable impacts of the project and avoid segmentation of an approval. Guidelines require that the project description be consistent and comprehensible for the reviewing public. This document is inadequate on both counts, although the fault may well lie with the applicants (Verizon and AT&T) more than the Planning Department. Nonetheless, the planning department should not be issuing an inadequate Mitigated Negative Declaration because the applicants have

refused to provide needed submittals. Rather they should refuse to issue the document until applicants have provided necessary materials.

This site has received numerous proposals for modification and expansion over the last 8 years from the existing operators (T-Mobile and Sprint) and other companies including Metro PCS, AT&T, and Verizon, proposals that collectively would have given rise to an industrial antenna farm of approximately 7 antenna poles and 16 transmitters. This long history of interest in the site supports the conclusion that further efforts to expand the site are reasonably foreseeable. It is therefore reasonably foreseeable that there will be a number of proposals for this site. The county should be examining at least two additional carriers at this site in the mitigated Negative Declaration. It would be incorrect to examine only Verizon, and then another carrier a few months later, and then another after that. Such segmentation is not allowed by CEOA.

The document describes the project as involving the addition of two new carriers (Verizon and AT&T) for a total of 4 facilities, 8 antenna poles, 4 equipment pads and enclosed equipment cabinets comprising over 936 square feet of leased space and, with easements for access, at least an additional 800 square feet of new impervious surface. (Note that many single family residences do not have a footprint as large as 1736 square feet.) Verizon is described as proposing three 20 foot high antenna poles and AT&T two 15 foot high poles. However, there is evidence in the document that indicates there may be additional carriers, indeed Metro PCS has a pending application, and the site plans and elevations, Radio Frequency analysis, and visual analysis are not consistent with the project described.

- (1) On page 2 of the document, footnote 3 states that Metro PCS has a pending application and has not confirmed that it is withdrawing the application. Even if MetroPCS does withdraw, it is reasonably foreseeable that another carrier may propose a similar facility. The County's Wireless Telecommunications Ordinance explicitly sought to require an applicant to provide a 10 year build-out plan.
- (2) Throughout the document there are inconsistencies on the number of carriers and poles which need to be corrected in a reissued document.
  - a. For example, on page 27, in discussion of point 10d, the FIVE carriers maintenance activities are discussed.
  - b. Hayes Land Mapping (exhibit C-1) and MSA's Site Plan and Elevations (exhibit A-1 to A-4), both part of Verizon's proposal, do not include any of the equipment proposed by AT&T. AT&T did provide a site plan and elevations in June 2013 so those plans should have been incorporated. AT&T's exhibits include some (but not all) proposed Verizon equipment, and incorrectly label it as "existing". The number of poles shown for Verizon is wrong in AT&T's drawings. Since the number of poles and the ability to adequately screen the poles

- requires mitigation and limits, the correct representation of the poles matters, and the inconsistencies throughout the report render the document inadequate.
- c. The Verizon visual simulations do not incorporate the poles proposed by AT&T. Some of those poles appear to be rather close to Verizon's proposed poles; indeed those poles in the northwest corner of the property appear to be almost on top of each other. Their omission is confusing at best and misleading to the public at worst.
- d. Attachment I explicitly acknowledges that AT&T's simulations do not match its current proposal but are 3 ½ years out of date (August 2010) and match an earlier proposal which involved no new poles. Given the very reasonable concern about an excess of poles on a ridgeline which cannot be adequately screened, these simulations are more misleading to the public than omitting them entirely.
- (3) Verizon's Radio Frequency report submitted by Hammett and Edison (Attachment C) incorporates existing and proposed equipment for FIVE companies: T-Mobile, Sprint, MetroPCS, Verizon, and AT&T. But the equipment being assumed in the study (the directional panels and poles) does not match what is being proposed, leaving doubts as to whether the FCC guidelines are being met or not. The front page alerts the public to this inadequacy: "Note: A Metro PCS site is included in this report but is not a part of this project. Also, this report does not reflect the current AT&T proposal shown in Attachment H. This report analyses an earlier proposal involving no new poles and new antennas on an existing utility pole." Although the warning is appreciated, the lack of an adequate RF analysis means a new analysis must be done and a new Mitigated Negative Declaration issued for public comment.
- (4) The document mailed to interested neighbors in Palomar Park has site plans and elevations (Sheets A-1 to A-4) for Verizon with labels that cannot be read because they are blacked out due to the copying in black and white. Thus there are pieces of equipment shown, but what is existing or proposed and whether the drawings are complete cannot be understood.

Throughout the various reports, many elevations and plans are dated from sometime in 2009 through 2013, and thus incorporate different versions of proposed expansions of this site. These inconsistencies render the analysis of impacts fatally flawed. The Mitigated Negative Declaration needs to be amended and reissued with a consistent project description and analysis. That means the applicant needs to pay for and submit revised site plans and elevations, RF analysis and visual simulations that are consistent with the proposed project. A new landscaping plan is also needed, as discussed in Section III (1) b.3.

It is quite possible that the applicant(s) have balked at spending money on new analyses, which is not the fault of the Planning Department. Over the past eight years we have seen a great deal of unresponsive and even bullying behavior from carriers who think they do not need to pay attention to local ordinances and process. But, if the applicants are not providing corrected materials needed for an adequate Mitigated Negative Declaration, then the correct action is for the Planning Department to inform the Applicant that they cannot move forward with a document that is inadequate under CEQA. Verizon cannot complain that it doesn't have information on AT&T's plans as there are recent plans from AT&T that are now in the public domain that it can incorporate. The requirements of CEQA to examine what is reasonably foreseeable and the County's own wireless telecommunications ordinance require more than an examination of only one applicant's proposed equipment at a time.

## Ill. Specific Corrections and Comments on the Discussion and Mitigations Proposed

- (1) Arborist Report by David Babby 2/23/2012 and Mitigations Relating to Landscaping (#2-5)
  - a. The Arborist Report incorrectly assumes that certain trees along the NW property line are on the Brooks property. The Hayes Land Survey submitted by the applicant shows that one of the pine trees (identified as Tree # 10 in the Arborist report) is on our property (1354 Pebble Drive) not on Curtis Brooks' property. Tree #9 with an estimated 22 inch diameter trunk appears to have a trunk that crosses the property line itself and is therefore co-owned (the exact centerpoint of the tree may be on the Brooks property—it is hard to tell—but the size of the trunk means that the trunk itself crosses the property line). Both trees are approximately 60 to 75 feet tall with 22 to 24 inch meter trunks, and although they are admittedly not in terrific health, they do provide grace and separation between the two properties, and they are in better shape than when the arborist saw them. In the summer of 2013, Mr. Brooks trimmed off limbs that were overhanging his property and which he felt posed a risk to his roof. It is inappropriate for the county to require in Mitigation Measure #2 the removal of trees not on the applicant's property or which are co-owned, and which are <u>not even near</u> the proposed wireless telecommunications equipment. The only project element that is near these trees is an emergency generator receptacle, which should be moved further away to the northeast anyway; it appears to be planned too close to the northern property line. (Again, the scale of the drawings in the material available for review makes this hard to determine precisely.)
  - b. Apart from the two pines just discussed and a fallen tree, the proposed project calls for the further removal of 3 significant trees

(for AT&T's plan), the removal of 18 smaller trees which have died, and the installation of 36 replacement trees (27 by Verizon and 9 by AT&T.) Mr. Brooks and the wireless communication carriers have a very long history of failed plantings at this site. The Arborist Report is scathing in identifying "a lack or complete absence of irrigation to the rootballs and any water supplied by drip emitters being insufficient" (page 2). We think planting 36 5 gallon trees are likely to fail again, and it is frankly hard to understand how 36 new trees are going to be established on the crowded site, as more and more land is given over to what is essentially an industrial use. The arborist report does not discuss the addition of 36 trees, or even 27, but merely discusses mitigation measures for existing trees to be retained. Verizon's submitted landscaping plan by Borrecco/Kilian was done in October 2009 and does not show how 36 trees (or even 27) can be added to the site. Since visual issues on this ridgeline property are major concerns, Verizon should provide a plan and a certified arborist report that shows how 36 (or even 27) trees can be added to the site without harming existing trees and while being aesthetically pleasing, and in the event the arborist cannot recommend the addition of 36 5 gallon trees, how a fewer number of larger trees could be added and properly nurtured. Otherwise the mitigations proposed to screen the industrial equipment will never be successful—they are merely empty words.

- c. Mitigation Measure #4 requires a \$4000 surety deposit for both performance and maintenance of planted trees, plus annual reports by a certified arborist. We commend the county on this requirement, especially the annual reports, but think that the deposit amount is woefully low for 36 trees, installation, fencing, irrigation, and maintenance. Water costs are also very high; for a similar property size, we have bills in excess of \$600/month in the summer. Given these costs for 36 trees and a very long history of neglect of the county's required landscaping conditions, we recommend a \$10,000 surety deposit.
- (2) Aesthetics and County Wireless Telecommunications Facilities Ordinance (Section 6510)

In section 1, Aesthetics, the document states that "the project is subject to the Wireless Telecommunication Regulations (Section 6510 of the Zoning Regulations)" and is "for the purposes of CEQA...in substantial conformance with Section 6510." No further information is provided that would allow the public to understand or contest this assertion. The County spent considerable effort and time on developing a fair and balanced Wireless Telecommunication Facilities Ordinance and , in residential zones, it includes requirements for the applicant to provide a 10 year build-out plan, evidence of contact with other carriers, an

examination of the feasibility of co-location at other existing facilities of other carriers, and a detailed alternatives analysis. There is good reason to doubt that the 10 year plan requirement has been met given the inconsistencies and incompleteness of the analysis of the proposed project in the document. The county's assertion without evidence is inadequate. In a revised and reissued Mitigated Negative Declaration, the information provided by the applicant and its adequacy to meet the CEQA "substantial conformance" requirement needs to be discussed in adequate detail.

- (3) Aesthetics, Land Use Planning and Mitigations 11 a, b, and c
  In sections 1 (aesthetics), section 4 (biological resources), and section 10
  (Land Use Planning), the county correctly identifies that the proposed project significantly conflicts with County General Plan Policy
  4.27 (Ridgelines and Skylines). The document states that the "project will result in development on a ridgeline that would degrade the existing visual character or quality of the site and its surroundings" and proposes Mitigation Measures 11 a, b, and c to address this issue. We appreciate the county's commitment to protect ridgelines, but do not believe the mitigation measures as worded go far enough.
  - a. Mitigation Measure 11a should be reworded to require what is already required by section 6510, the Wireless Telecommunications Facilities Ordinance: a detailed alternatives analysis that shows there are no feasible alternatives or combinations of alternatives that "eliminate or substantially reduce significant gaps in the applicant carrier's coverage or network capacity." The requirement to "consider alternative building sites which are not on a ridgeline" is simply too vague as to what is required.
  - b. We appreciate and support the County's requirement in Mitigation 11b to use pine or redwood tree forms to better conform the project to the ridgeline.
  - c. Mitigation 11c should be revised to read "Reduce the total number of antenna poles proposed for new installation to a maximum of 3 poles at the site meeting Mitigation Measure 11b in order to minimize scenic impact." This has been discussed at length under section 1. above, and the reasons why this revision is needed to continue without a full EIR. However, it should also be noted that it is improper to provide a convenient out for any gap in service in any county mitigation, as that could allow a carrier to argue its loss of a single residence or section of road could constitute a gap which allows them to avoid the requirement. Clearly, whenever possible gaps in service are at issue, a carrier should have to meet the similar standard of the Wireless Telecommunications

Facilities Ordinance (6512.5, item 16) which requires proof that they are unable to "eliminate or substantially reduce significant gaps" not just any gap. Nonetheless, we believe no out is appropriate at all for this Mitigation 11c, as discussed at length already.

### In Summary:

- 1. Either a full EIR needs to be prepared at the applicant's cost or Mitigation 11c has to be revised as discussed above.
- 2. The Mitigated Negative Declaration needs to be amended and reissued with a consistent project description for 2 or more carrier additions, with consistent site layouts, elevations, RF analysis, visuals, and a landscaping plan that shows the required 36 new trees are possible. If the applicant refuses to provide updated materials, then the county has no obligation to issue an environmental document or proceed further.
- 3. There are a number of smaller points that should be corrected in a reissued Mitigated Negative Declaration, as spelled out above.

It is frustrating for both the citizens and county staff that not all wireless carriers have provided adequate project descriptions and supporting materials. Please demand of applicants that they comply with CEQA requirements and county ordinances.

We appreciate the county's patience with this long letter, and we look forward to reviewing the amended document.

Sincerely yours,

Alicia Torre and Jonathan Nimer

Sally Einspahr 1165 Palomar Dr Redwood City, CA 94062

February 9, 2014

Camille Leung Project Planner Planning and Building Department 455 County Center, Second Floor Redwood City, CA 94063 cleung@smcgov.org

REF: Verizon/ATT – 1175 Palomar Dr, Redwood City, CA

Dear Camille:

I oppose any expansion of 1175 Palomar Dr., Redwood City, CA cell site. By adding 5 more antenna sites to this property is creating an industrial use of a residential property.

Palomar Park has long been a neighborhood of well established single family homes. It remains a coveted area in which to live on the SF Peninsula, with its peaceful rural atmosphere in the mist of busy city life. To let big business destroy that atmosphere is a crime by big business and by the county who would let it happen.

Verizon and AT&T have not complied with the San Mateo County Zoning Regulations for Wireless Telecommunication Facilities.

#### **Section 6510 - San Mateo County Zoning Regulations states:**

New wireless telecommunication facilities shall not be located in areas zoned Residential, unless the applicant demonstrates, by a preponderance of the evidence, that a review has been conducted of other options, and no other sites or combination of sites allows feasible service or adequate capacity and coverage. This review shall include, identification of alternative sites within 2.5 miles of the proposed facility. 6512.5 # 11 states: and provide and explanation of why co-location of these existing sites is not feasible.

No report has been attached to the Neg Dec. Merely saying there are no other feasible sites is not good enough. They must supply a written detailed analysis.

Palomar Park Homeowners have continued to supply cell companies with 3 sites that are not in residential areas, which would handle their needs. The cell companies continue to ignore the suggestion because it would cost more money on their part. They list sites that are obviously not suitable or even out of the area.

Section 6512.5-#10 - San Mateo County Zoning Regulations states-

For projects that are technically capable of accommodating additional facilities, a description of the planned maximum 10 year build out of the site is required. Cell companies need to provide

#### Camille Leung

#### written evidence that this information has taken place.

No mention of a 10 year build out plan for the applied property is listed in the Neg Dec. How many more companies will continue to apply with how many more poles and antennas will be placed on this project? Cell companies need to provide a detailed alternative analysis that shows no feasible alternative non residential site or combination of non residential sites are available to eliminate or substantially reduce significant gaps in the applicant carrier's coverage or in network capacity.

# The CEQA requires the agency evaluate all reasonable foreseeable impact of the project and avoid segmentation.

Given the history of this site expansion is not the question, but a reality. The applicants have not even tried to produce such a report with all carriers listed. This has been asked for time and time again in all the hearings.

Why was the County not provided with a visual simulation showing the full scope (8 antenna poles) plus those of other carriers who are waiting in the wings for this project plus the 10 yr build out plan? **CEQA does not allow for segmentation**. Therefore, this Neg Dec needs to be rewritten with the full scope of plans for this property by all carriers.

County needs to examine all carriers at one time not just Verizon. What little AT&T information provided for this report was inconsistent with documentation supplied.

#### **SECTION 6565.16 STANDARDS FOR DESIGN IN PALOMAR PARK state:**

## A #2 SITE PLANNING – MINIMIZE ALTERATION OF THE NATURAL TOPOGRAPHY

Installing an "Antenna Farm" is altering the natural topography

# A #3 RESPECT THE PRIVACY OF NEIGHBORING HOUSES AND OUTDOOR LIVING AREAS

Having to look at a 20' cell is not respecting the privacy of the neighborhood. All new utilities are required to be underground so why would the neighborhood want to have an "Antenna Farm" with unsightly towers.

#### Mitigated Negate Declaration: File No PLN 2005-00306

#### #3. Project will not degrade the aesthetic quality of the area.

With that addition of 5 new antenna poles to an already existing 3 poles on the applied property it turns that property into an industrial use of residential property. Essentially - an "Antenna Farm". No one wants to look at their view from their home and see a 20' tower with cell panels. It not only degrades the aesthetic quality of the area by turning the area into industrial property with no regard for the residential neighborhood.

# #5. d – Create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Industrial use projects, such as "Antenna Farms", in residential neighborhoods will bring property values down. It will degrade the quality of the environment by forcing the homeowner to declare the 8+ cell towers in the area when putting one's home up for sale. With a declaration such as that, it's a huge burden to place on neighboring property land values.

#### **Mitigation Measure 11:**

#### a. Consider alternative building sites which are not on a ridge line.

Palomar Park Homeowners have provided available sites which were never considered by the cell companies. The sites suggested were on public lands and would meet the needs of the companies. Mitigation Measure 11, Section 10, b, requires the cell companies to search out areas that are not on ridge line or conform the project to a ridge line environment---This report is not included. **Why??** County's report should be reissued with full reports that are missing.

# In order to comply with County General Plan 4.27 ----applicants shall use structural design alternatives for new antenna poles---pine or redwood tree form ---

The state of California is facing the worst drought since they have been keeping records and the companies want to remove perfectly good trees and plant more live trees which will require a great deal of water to get started. Their past track records show the trees never live for more than a few months. County states -tree removal will dramatically increase the visibility of the project from adjacent residential areas, public roads, and will degrade the existing visual character of the ridge line in an urban setting. AND project could

Reduce the total number of antenna poles proposed for new installation to a maximum of 3 in order to minimize the scenic impact.

With the State drought and the fact that a tree forms could reduce the amount of poles to

3 on the project – County should force the use of the tree forms in this project and any other projects of this sort because of the State water situation plus the Ridge Line Rules.

County's statement --- "by using tree forms --- unless doing so would directly result in a gap in service". Tree forms have been used for years with no complaint of gap in service. The carriers can use a combination of sites if there is actually a gap in service. However, there has been no proof of a gap in service reported by the carriers if these forms are used. This statement by County should be stricken from the Neg Dec.

Page 4

Camille Leung

#### Mitigation 4:

#c. Property owner shall comply with the following requirements regarding tree

#### replacement.

Property owner and cell companies have a long history of failed survivor rate in regard to planted trees. Frankly, cutting down full grown trees and replacing them with only 5 gal. size is a bad idea. The trees will most likely fail again before they reach any kind of size to hide the structures. The arborist report dates back to 2009 and does not show how 36 new trees can be added to the site. Why wasn't an up to date report placed in report? A lot has changed on that property since 2009.

A \$4,000 deposit for performance and maintenance of planted trees is an inadequate amount and should be raised to \$10,000 in order to care for the trees properly.

#### **Mitigation 9: Erosion**

County should note, if the trees are watered properly this excessive amount of water could cause the hill to slide since there has been no water to that area for years. Palomar Park has a history of mud slides in the past. When it rains the hill in front of my house sloughs off when the ground gets saturated with water. My back hill, which is made of the same material as the project, has been known to slough off after or during heavy rains.

Will the wireless companies pay to have the hill stabilized if there is damage from a slide? There should be a bond posted with the County by each carrier, because mud slides are expensive to repair correctly.

#### Hazards and Hazardous Materials #8. k.

County should investigate the matter of erosion and where that water is going to run before they start pumping water into the dry ground for the new trees. Thus exposing people and structures to significant risk of loss on the down hill side of the property. Report claims "No Risk", but having lived in the hills for 40 years this is the first concern we all have when there is suddenly a major change in water drainage in the hills.

#### **FCC Radio Frequency Report**

Equipment being assumed in the study (directional panels and poles) does not match what is being proposed. This leaves doubts if FCC guidelines are being met, especially if other carriers move into the site.

The Applicant/applicants need to submit revised joint site plans with elevations, RF analysis and visual simulations that are consistent with this proposed project and show how additional carriers are applied to the property. County and people in the neighborhood need to see the full scope of what an "Antenna Farm" will look like when it's built to capacity. County needs to stop the piecemeal process and force all the carriers to set down and explore plans together for the next 10 years before permits are issued. Please amend and reissue the Mitigated Negative Declaration because of inconsistencies.

#### Camille Leung - Palomar Park-Cell Towe Site

From:

Bob Guenley <br/>
<br/>
bguenley@benchmark.com>

To:

CLeung@smcgov.org

Date:

4/24/2014 6:48 AM

Subject: Palomar Park-Cell Towe Site

CC:

saleinspahr@aol.com

#### Dear Ms. Leung:

I have lived in Palomar Park since 1978 and consider it a special place on the Peninsula because of the rural atmosphere all residents enjoy. I don't think commercial/industrial activities belong in any residential neighborhood, & am particularly concerned about the cell site at 1175 Palomar Drive since I live directly across the street from that property. With the exception of the current cell sites, Palomar Park is generally the same as it was in 1978, a quiet & peaceful area where people can take leisurely walks on the streets & enjoy the native trees, foliage & wildlife. This type of atmosphere is becoming more difficult to find in the Bay Area & San Mateo County, & allowing cell sites in a residential area is a step toward degrading this atmosphere, which I believe is unnecessary & inappropriate. If cell sites are allowed in Palomar Park does this set a precedence for other commercial/industrial development in Palomar Park or other rural areas in San Mateo County? I am saddened to imagine this, but I can easily imagine other commercial enterprises using this to change the atmosphere in another community, & at that point when does the commercial/industrial development in residential areas end?

I am opposed to the addition of more cell sites in Palomar Park, & would like to see the existing cell towers removed. All too frequently I see numerous commercial vehicles at 1175 Palomar Drive & I don't believe that type of activity should take place in a residential area.

Thank you for your time & attention to this issue, & please feel free to email or call me if you have any questions about this matter.

Sincerely,

**Bob Guenley** 1150 Palomar Drive Redwood City, CA 94062 Phone: (650) 234-4015 Fax (650) 261-1210 bguenley@benchmark.com

### Camille Leung - Cell Towers at 1175 Palomar Drive

From:

"Thomas M. Nachbaur" <tmnach@yahoo.com>

To:

CLeung@smcgov.org; tmnach@yahoo.com

Date:

4/26/2014 9:19 PM

Subject: Cell Towers at 1175 Palomar Drive

CC:

palomarnews@gmail.com

56 Loma Road Palomar Park, CA 94062-3848 April 26, 2014

Board of Supervisors c/o: Camille M. Leung, cleung@smcgov.org County of San Mateo 400 County Center Redwood City, CA 94063-1662

Re-Proposed Build-out plan for non-compliant cell tower site at 1175 Palomar Drive, in unincorporated Palomar Park, San Mateo County

Dear Honorable Supervisors:

As residents of Palomar Park for 40 years, we object to the presence of wireless antenna towers in our RESIDENTIAL community. Cellular sites are industrial facilities, which are incompatible with residential areas. The towers and their requisite outbuildings are eyesores. The location of the Cellular Communication Site, 1175 Palomar Drive, is at the end of a long, privately maintained road. Construction and support of this site adds unnecessary wear to a private road, which Palomar Park residents must repair.

Further, research has shown that radio transmission from cell towers poses a serious health threat to humans, animals, and trees. "Over 100 scientists and physicians at Boston and Harvard Universities Schools of Public Health have called cell phone towers a radiation hazard." (emwatch.com)

This site provides NO cellular coverage for the residents of Palomar Park and only fill-in coverage for Edgewood, Cordilleras, and Crestview. Studies on file with the Planning and Building Department show that this service can be provided through a combination of existing sites and other locations.

We trust that you, our elected representatives, will honor the precedent set by your previous decisions and reject the expansion of this permit. In fact, you should take this opportunity to cancel all cell tower permits at this residential location.

Sincerely,

Thomas M. Nachbaur, M.D., M.P.H.

Susan L. Nachbaur

From:

Chris Myers <chris@strawberrypear.com>

To:

CLeung@smcgov.org; chris@strawberrypear.com

Date:

4/30/2014 12:56 AM

Subject:

Commercial/Industrial Cell Site in Residential Palomar Park

Chris Myers 1021 Palomar Dr Palomar Park, CA 94062 April 29, 2014

Board of Supervisors c/o: Camille M. Leung, cleung@smcgov.org County of San Mateo 400 County Center Redwood City, CA 94063

Re-Proposed Build-out plan for non-compliant cell tower site at 1175 Palomar Drive, in unincorporated Palomar Park, San Mateo County

Dear Honorable Supervisors,

I am writing to voice my most strenuous objection to the continued presence of a commercial/industrial site in our residential community. The cell towers and associated equipment at 1175 Palomar Dr do not belong in residentially zoned Palomar Park. This industrial site should never have been placed within our residentially zoned community in the first place. In fact, residents never were asked for their input, and this site would not exist at all had the County done proper due diligence in examining the matter when it first arose. Any expansion of this site only adds insult to injury making an already bad and improper situation worse.

It is a totally unacceptable installation of a commercial/industrial site within Palomar Park, and it is most egregiously wrong because we as residents along the outer portion of Palomar Dr pay for and maintain from our own pockets the entire road section along which the trucks and vehicles drive to access this site. I personally HAVE PAID and continue to PAY FOR AND MAINTAIN the road which the companies owning the equipment at this site use to access and maintain the site.

The presence of this site degrades my property value, for which I have received no compensation. So, not only do I and other residents have to ourselves pay the expense of repairing and maintaining this non-county road on behalf of the commercial entities that use this industrial installation in my neighborhood, but on top of that every time this illegal installation of a commercial/industrial site is built out further, I lose even more from the value of my home itself. This is at best insulting and a zoning violation, and it is most likely illegal.

How many potential home buyers visit our section of Palomar Dr only to find out about this industrial installation and then turn away having read the studies showing the health hazards posed by these kinds of cell-tower transmissions at such industrial installations? It isn't just my own property value that is degraded, it is the same loss in equity for all property owners on this stretch of Palomar Dr. This all results from the installation of a commercial/industrial site within our residential community.

It is infuriating and fundamentally wrong, that I and and other residents must pay to maintain the very roads used by these commercial interests. The result is

that we are in fact PAYING FOR AND THEREBY FACILITATING the presence of this illegal industrial site while at the same time ITS VERY PRESENCE DEGRADES OUR PROPERTY VALUES AND HEALTH.

As if the problem were not bad enough, this site is not even necessary for the commercial interests that use it. There are cell-coverage studies on file with the Planning and Building Department which show that this service can be provided through a combination of existing sites and other locations. Why aren't the companies using this site required to justify their continued presence? Did these companies EVER demonstrate that this site in our residential community was necessary for any reason other than their own convenience and profit? Surely without any justification from the corporate interests for the continued presence of this site, the County has every right to terminate all licenses and permits that exist already (however they may have been obtained in the first place).

I strongly urge that you, as my elected representatives, honor the precedent set by your previous decisions and reject the expansion of this permit. In fact, it is time for the County to correct its past mistakes and take action now to cancel all existing cell tower permits and allowances for commercial/industrial activity at this residential location.

Please remove this site from Palomar Park.

Sincerely,

Chris Myers

From:

<noladavis314@yahoo.com>

To: Date: CLeung@smcgov.org 5/12/2014 6:16 PM

Subject:

Cell towers in Palomar Park

Dear Ms Leung

I am writing to tell you I am very much opposed to any more cell towers or extra cell equipment in Palomar Park. I am a long time resident at 314 Palomar dr. I don't want ANY cell phone towers in our area.

Nola Davis (650) 367-7894

Sent from my iPad