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ATTACHMENT 3

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Narrative in Support of
APPLICATION FOR A WIRELESS COMMUNICATION FACILITY

Submitted to the City of Santa Rosa
Planning Commission
December 17th, 2020

1. Proposal Summary Information

Applicant:	Crown Castle Towers 06-2 LLC Jacob Sparks – (979) 551-5148 2055 S. Stearman Drive Chandler, AZ 85286
Representative(s):	Beacon Development LLC Jason F. Osborne – (415) 529-8868 3 Rovina Lane Petaluma, CA 94952
Property Owner:	Jim Fisher 1236 Cleveland Avenue Santa Rosa, CA 95401
Site Address:	1236 Cleveland Avenue Santa Rosa, CA 95401
Exact Location:	38° 26' 53.16" N, 122° 43' 34.49" W (NAD 83)
APN #:	012-061-032
Site ID:	855667
Request:	Approval of a Conditional Use Permit for a wireless communication facility
Legal Description:	Being a portion of the land described in the grant deed recorded May 15, 2008 as document No. 2008045116, Sonoma County records, State of California.
Zoning:	CG – General Commercial
Project Valuation:	\$175,000.00

2. Introduction

Crown Castle, a wireless communications infrastructure company operating in the City of Santa Rosa, owns and operates the wireless communication facility located at 135 Ridgway Ave., Santa Rosa, California 95401 ("Existing Site"). The Existing Site accommodates AT&T and Verizon wireless services and has provided wireless communications coverage in the area for the last 17 years. The original permits were exempt from local planning and building review due to the Existing Site being located on State of California owned property.

Crown Castle is one of the largest providers of shared communications infrastructure in the United States, with approximately 40,000 cell towers comprising of approximately 91,000 carrier installations. Crown Castle's extensive infrastructure serves as the backbone of the nation's communication network. The Existing Site is a critical component of that network, providing network continuity for the public interest, emergency 911-call services, and reliable long-term stability for AT&T and Verizon service levels in the City of Santa Rosa and the surrounding community.

3. Project Goals

The goal of the proposed Crown Castle wireless communication facility is to relocate the existing carriers (AT&T and Verizon) from the existing structure located at 135 Ridgway Ave., Santa Rosa, California 95401, to the newly proposed facility at 1236 Cleveland Ave., Santa Rosa, CA 95401. The proposed facility will provide continued multiband services for AT&T and Verizon to the community for emergency, business, and personal use.

This proposal describes the scope of the proposed project by providing specific information regarding the project location, zoning, and specifications, in relation to the City of Santa Rosa's code requirements pertaining to wireless communication facilities.

It is Crown's desire to work with the City to ensure that the project is consistent with the City's development guidelines and its surroundings while maintaining the existing wireless communications coverage that is critical for emergency, business, and personal use.

4. Nature of Request

Crown Castle seeks a Conditional Use Permit from the City of Santa Rosa's Planning Commission to build a new, replacement, wireless communication facility located at 1236 Cleveland Ave., Santa Rosa, CA 95401. The purpose of this facility would be to maintain existing coverage.

5. Property Description

The subject property is zoned CG – General Commercial within the Retail and Business Services general plan. APN# 012-061-032. The property is 0.66 acres.

6. Project Description

This is an unmanned communication facility consisting of the installation of an 888 sq. ft. multi carrier equipment compound, with an 83 ft. monopine consisting of the installation and operation of antennas and associated equipment. This project is located on private property and will

continue to provide wireless coverage to the local community. The Existing Site and associated equipment will be decommissioned once the new facility is fully operational. The new installation will not adversely affect the surrounding area and will have no impact on traffic other than during construction activities.

In addition to AT&T and Verizon, the new monopine will have the ability to co-locate additional carriers to provide service to area users and residents and fill in coverage and capacity gaps within their respective networks. The proposed wireless communication facility will provide services to the community quickly, effectively, and efficiently.

Existing Structure



The proposed site will be relocated 0.22 miles to the south from 135 Ridgway Ave. The current communication facility will be decommissioned, and a new permanent site is needed to ensure AT&T and Verizon can continue to deliver their high-speed wireless broadband services to their customers in this area. Crown Castle is proposing to relocate the current site 0.22 miles to the south of the Existing Site. The new wireless facility will provide coverage for the residents living

near Hwy-101, as well as the surrounding community in Santa Rosa. The new wireless facility also serves a critical role in coverage that is necessary for emergency services along Hwy-101.

Proposed Site Without New Tower



Crown proposes to construct a new, replacement 83 ft. monopine. The proposed structure can accommodate additional carriers to provide more wireless services to the area for emergency, business, and personal use.

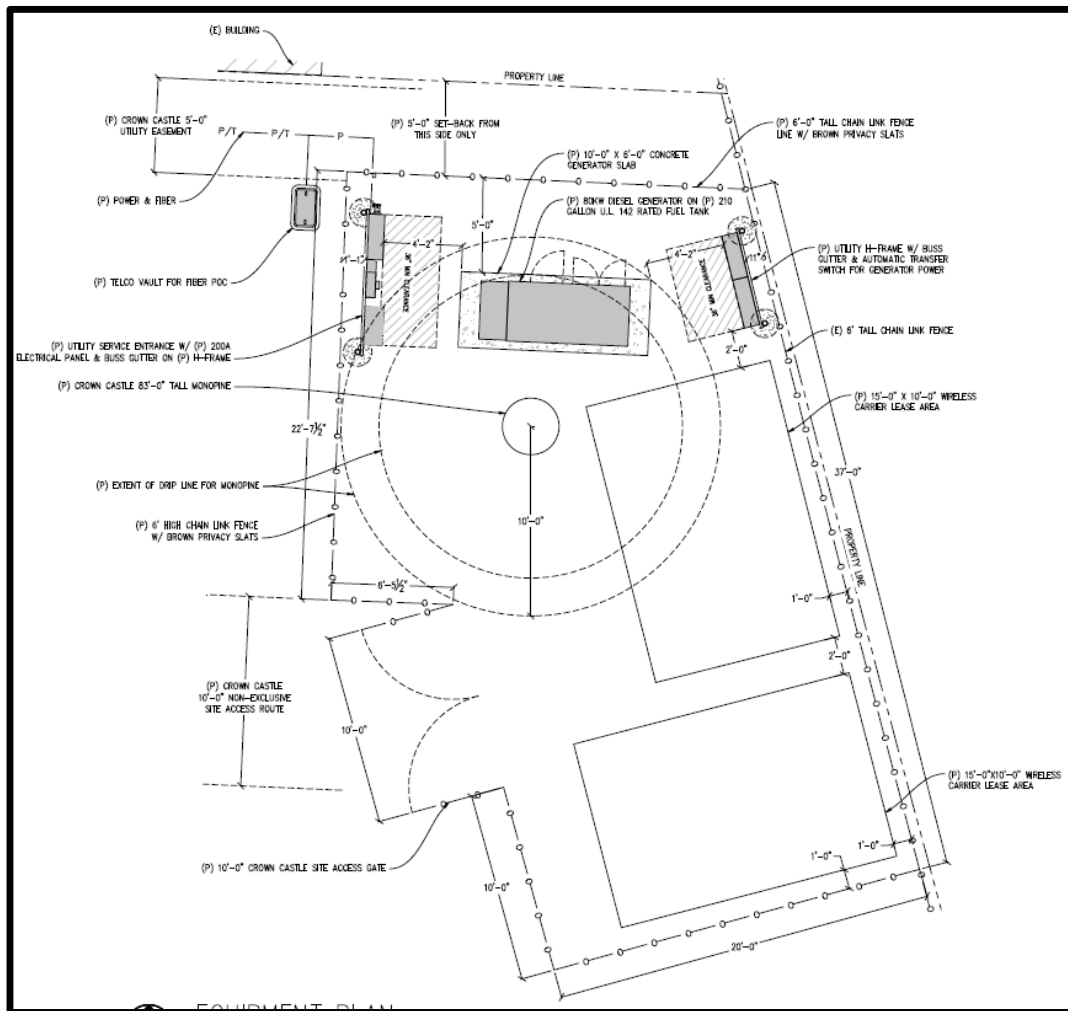
The location of the proposed site is near the existing communication facility as there is minimal flexibility when relocating existing communication sites because they are “tied” to their neighboring communication sites as part of a network. The proposed location will allow for the carriers to closely mimic their current network coverage without disrupting service levels and avoiding the creation of new coverage gaps.

Proposed Site with New Tower



The proposed heights of the carrier's antenna installations on the monopine are 65 ft. and 75 ft. from ground level. Typically, each carrier/customer has its own shelter/cabinet(s) as well as their own electric meter and fiber source in the leased compound. The available ground space in the immediate area will allow for future carriers to be collocated. The newly proposed structure, antennas, and all hardware will be painted to match the green foliage of the monopine, creating a unified natural look.

Proposed Equipment Compound



The structure will follow City building codes and design standards as directed by the City of Santa Rosa's Planning Commission.

Project Data Table

Site Development Regulations	Existing Structure	Proposed Structure
Current Height	84'	83'

Setback to Property Lines	N - 7', S - 490', E - 280', W - 75'	N - 17', S - 155', E - 15', W - 138'
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7. Site Justification

It is critical Crown pursues the least intrusive means possible to fill a significant gap in coverage. The search area in which a site can be relocated is limited, because each site is a link in a chain of sites and cannot move very far in any direction once the network has been established. Moving too far one way or another would cause interference or create a gap in coverage. The proposed location at 1236 Cleveland Ave., Santa Rosa, CA 95401, is the least intrusive candidate in an acceptable range for a replacement structure to match the coverage of the existing structure.

The reason for this proposed relocation request is due to the current site lease nearing its expiration. Its Crown Castle's obligation to protect its customers from loss of coverage in this area. Therefore, moving the existing site to the proposed location is the least intrusive means to preserve the area's coverage. The proposed site is just over 0.24 mi. southeast of the existing site.

Wireless communications are the primary mode of communication for Americans in the twenty-first century. That fact is adequately demonstrated by the latest surveys in the industry, which reveal that over 50% of American homes rely solely on wireless devices. Over 90% of households have at least one mobile phone. In a recent report, the "National 911 Program," which is an office housed within the National Highway Traffic Safety Administration, found that "76% of consumers are using cellular phones to make 911 calls." Wireless communications are a critical part of a community's health, safety and welfare.

With the proposed location and the proposed tower height, AT&T and Verizon will be able to maintain their current coverage and possibly increase their overall footprint with upgraded equipment. This will allow our carriers to increase the quality of their coverage and increase capacity in the area. The proposed structure will support AT&T and Verizon's dual-band radio technology. This technology will offer LTE services. AT&T will be able to install the appropriate equipment for their First Responder Network Authority (FirstNet). Their mission is to deploy, operate, maintain, and improve the first high-speed, nationwide wireless broadband network dedicated to public safety. The proposed new antenna equipment will readily accept the next generation of wireless technology – 5G.

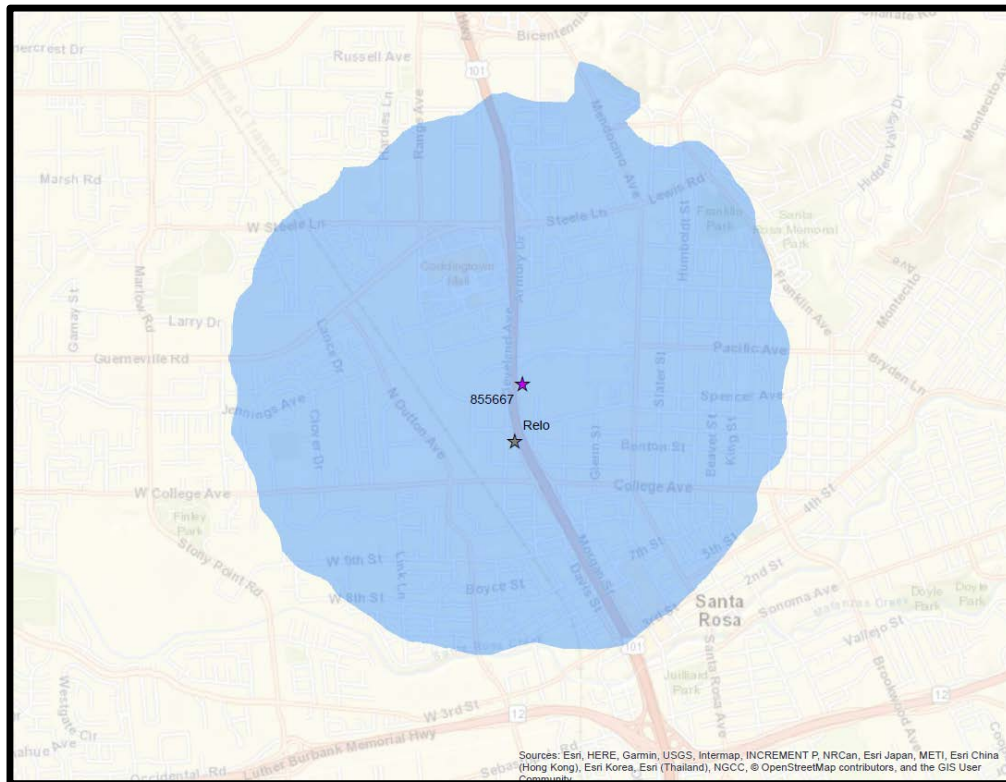
In order to further pursue the least intrusive means for the proposed communication facility, as required, the new structure will be stealth to blend in with the surrounding vegetation and foliage. The photo simulations provided show the proposed structure is designed to be stealthed as a pine tree. The existing structure, as is, does not have any stealthing techniques applied. The proposed facility will be more camouflaged than the existing site. It is Crown's goal to preserve the surrounding scenery.

8. Coverage Information

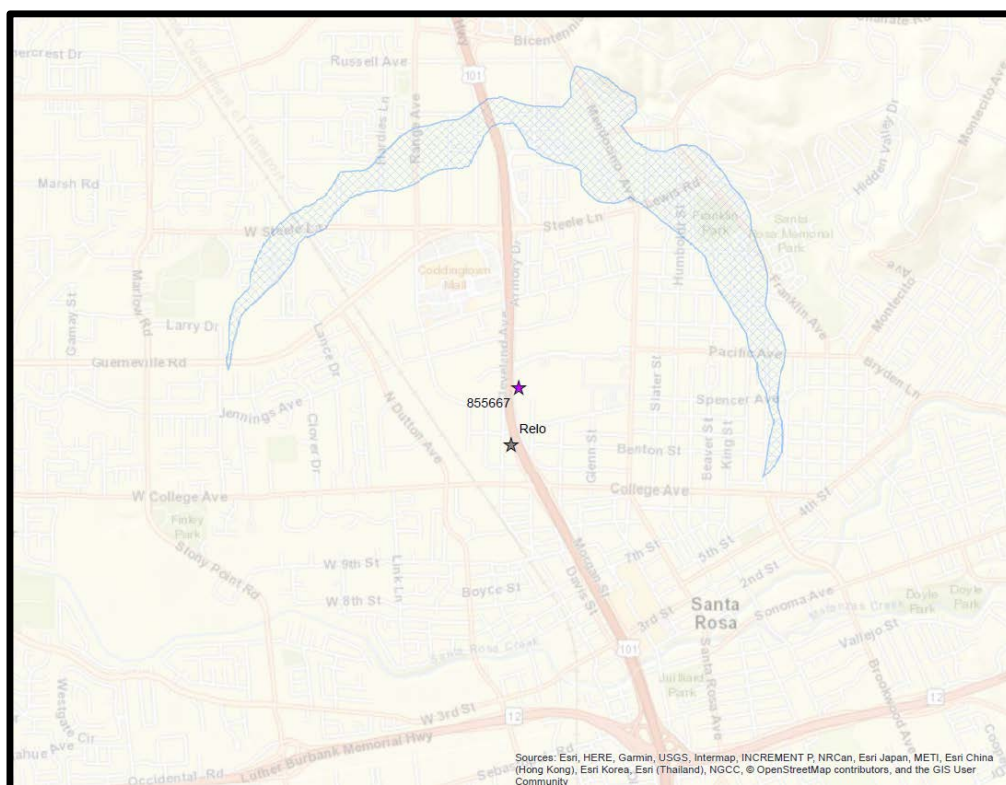
Currently, the existing structure covers the community within Santa Rosa and primarily Hwy-101 to ensure adequate coverage and capacity to the public. Without the newly proposed wireless facility, citizens of Santa Rosa will lose significant coverage along Hwy-101 and the surrounding community. The surrounding road network serves a major corridor for daily traffic in this area. The crossroads of Hwy-101 and College Ave. sees 160,000 vehicles per day on average (2017 Caltrans AADT report). The proposed site will best maintain the current coverage and will allow

for additional co-location opportunities. Signal propagation coverage maps below, show coverage with and without the proposed site for this area.

Existing Coverage – Map: AT&T

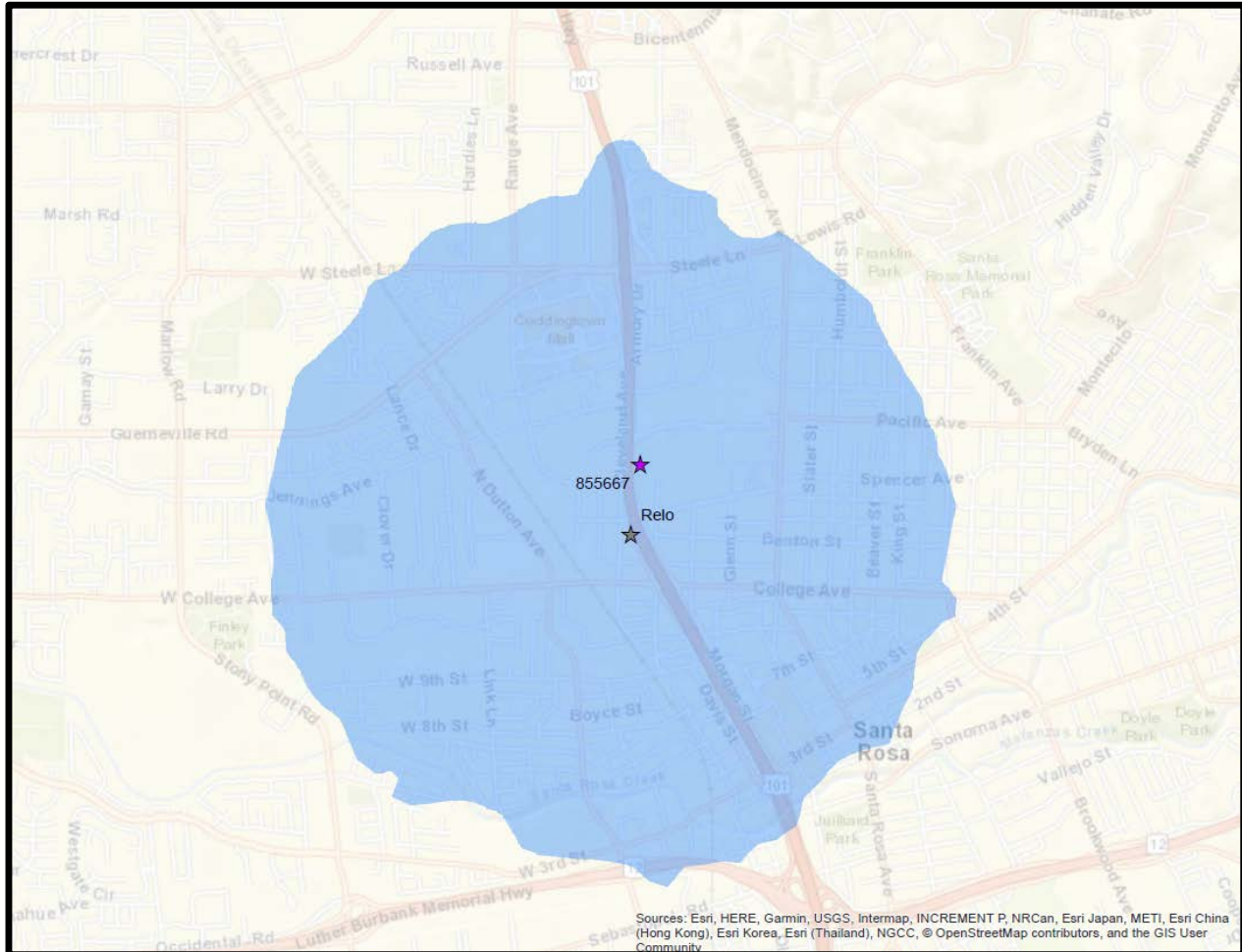


Without Coverage – Map: AT&T



(Coverage from neighboring AT&T sites is just outside the map extents, so coverage is completely lost)

Proposed Coverage – Map: AT&T

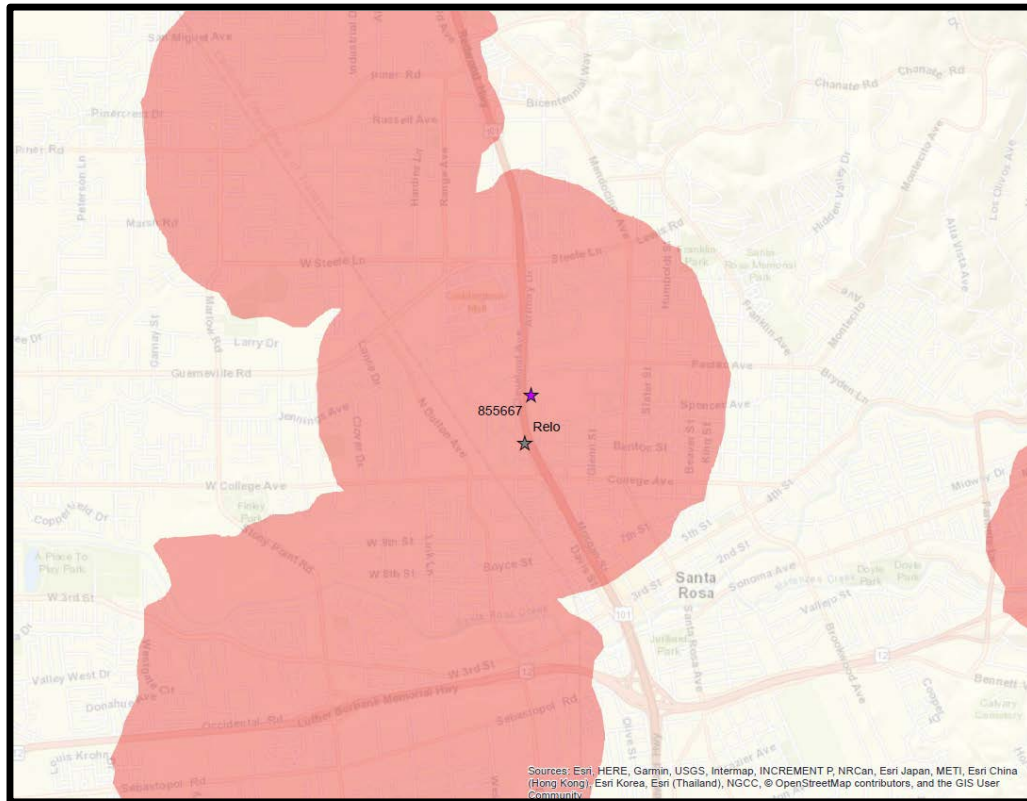


The proposed location of the new wireless facility will allow continual coverage of the area for AT&T. In the case for AT&T, roughly 4.5 square miles of Santa Rosa and the surrounding highway corridors would have zero coverage if the proposed site is not approved. This causes an enormous risk for everyday travelers and first responders traveling along that stretch of zero coverage.

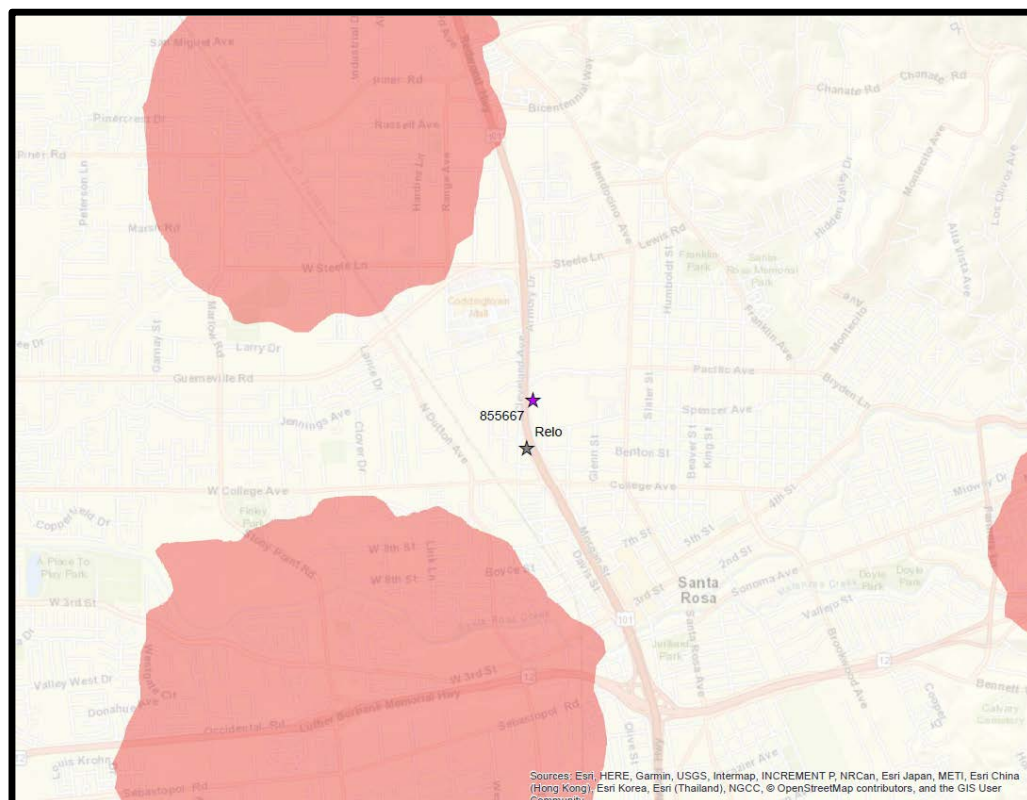
As previously mentioned, the surrounding road network serves a major corridor for daily traffic in this area. The crossroads of Hwy-101 and College Ave. sees 160,000 vehicles per day on average (2017 Caltrans AADT report).

The proposed structure would support AT&T's "FirstNet" emergency network. The First Responder Network Authority (FirstNet) mission is to deploy, operate, maintain, and improve the first high-speed, nationwide wireless broadband network dedicated to public safety. This network prioritizes first responders, and allows cross functional departments (i.e. police, firefighters, paramedics) to communicate through one shared channel.

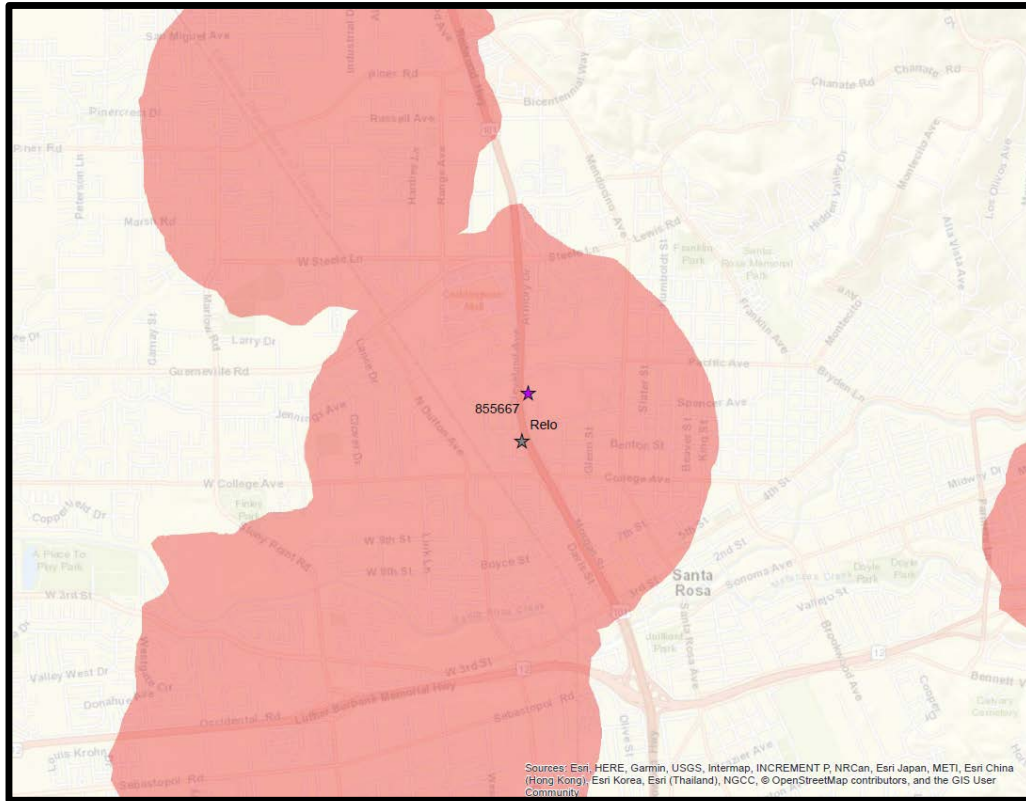
Existing Coverage – Map: Verizon



Without Coverage – Map: Verizon



Proposed Coverage – Map: Verizon



The proposed location of the new wireless facility would allow continual coverage of the area for Verizon. In the case for Verizon, roughly 3 square miles of Santa Rosa and the surrounding highway corridors would have zero coverage if the proposed site is not approved. This causes an enormous risk for everyday travelers and first responders traveling along that stretch of zero coverage.

Surrounding Santa Rosa residents that subscribe to Verizon's services would have zero coverage within that 3 square miles.

9. Zoning

The proposed site is in the City of Santa Rosa's jurisdiction. The parcel is zoned CG – General Commercial. Within the City of Santa Rosa's code, chapter 20-44.060 states all commercial telecommunication facilities, other than exempt or minor facilities are permitted within the CG zone subject to a Conditional Use Permit and Design Review.

The following codes were key requirements that created the need for direct responses.

Chapter 20-44.030 Development criteria for all facilities.

A. The antenna shall be accessory to the primary use of the property which is not a

telecommunications facility.

- *Response: The proposed communications facility is in accessory to the property on which it is located. The property is currently utilized as a water treatment facility.*

C. Telecommunications towers shall not be located within any setback area required by the applicable zoning district.

- *Response: The proposed communications facility is not located within any setback area required by the CG zoning district.*

G. The facility shall be as small as possible and the minimum height necessary without compromising reasonable reception and/or transmission.

- *Response: The proposed communications facility is the minimum height necessary to maintain AT&T and Verizon's existing coverage. There is no increase to overall height from the existing structure to the proposed structure. Additionally, the equipment compound has been designed to consume as little ground space as possible, while allowing space for future co-locations.*

Chapter 20-44.060 Commercial telecommunications facilities.

Section F

1. Innovative design solutions that minimize visual impacts should be utilized.

- *Response: The existing structure is not currently camouflaged, but the proposed structure will be camouflaged as a pine tree, referred to as a monopine.*

8. Telecommunication facilities should be designed and painted a color that blends with the surrounding natural or manmade features.

- *Response: The proposed communications facility and all accessory equipment installed on the structure will be painted to blend into the ascetics of a pine tree.*

14. Co-location of commercial telecommunication towers and the use of the same site by multiple carriers are required where feasible and found to be desirable.

- *Response: The proposed communications facility will allow for future co-locations*

16. All utility lines serving the facility should be undergrounded.

- *Response: The proposed communications facility's utilities will be underground. This includes power and fiber to the facility.*

19. All major commercial telecommunication facilities shall be located at least 75 feet from any habitable structure, except for a habitable structure on the property in which the facility is located.

- *Response: The proposed communications facility is not within 75 feet of any habitable structure.*

Zoning Project Data Table

Direction	Existing Zoning	Existing Use
Proposed Site	CG	Retail and Business Services
North	CG	Retail and Business Services
East	Hwy-101	Highway Corridor
South	CG	Retail and Business Services
West	CG	Retail and Business Services

Sonoma County Zoning Map



We have justified the need to place the proposed structure at 1236 Cleveland Avenue. due to our Carrier's need for coverage in the area.

Based on carrier coverage needs, permittable zoning districts, available ground space, and landowners' interest there were no other viable solutions that provided the coverage needed to eliminate or substantially reduce significant gaps in AT&T and Verizon's coverage network.

10. Statement of Operations

This facility will be an unmanned facility operating 24 hours a day, 7 days per week, 52 weeks per year. The facility is unmanned, entirely self-monitored and connects directly to a central office where sophisticated computers alert personnel to any equipment malfunction or breach of security.

Upon completion of construction, fine-tuning of the facility may be necessary, meaning the site will be adjusted once or twice a month by a service technician for routine maintenance. Periodic

testing and maintenance to keep the facility operational will require a service vehicle to access the property occasionally.

No goods are sold on this facility location, materials to be used for construction are outlined on the zoning drawings. This new wireless facility will blend into the surrounding area as it will be painted to jurisdictional requirements. There will be no advertising of the facility but there will be owner, safety, and required signing as set forth by the FCC and local jurisdiction.

11. Compliance with Federal Regulations

Crown Castle (as the owner of the facility) will not only comply with all FCC rules governing construction requirements, technical standards, interference protection, power and height limitations, and radio frequency standards, but ensure our respective tenants do as well. In addition, the company will comply with all FAA rules on site location and operation. We have also provided an EMF Study which reflects our adherence to FCC guidelines for RF exposure.

12. Federal Regulations Applicable to This Application

Federal law and the FCC's rules implementing the law require that this permit application be processed to a final decision by this jurisdiction without delay. Specifically, because this application proposes to install new equipment on a new tower outside the public rights of way, this application must be approved or denied within one hundred fifty (150) days from its submission, today.¹

Moreover, pursuant to FCC regulations, this application is deemed complete 30 days after today, unless written notice is provided to the applicant.² If the application is incomplete, within the next 30 days written notice must be provided specifying any items missing to make the application complete.³ For each item missing, the written notice must specify the code provision, ordinance, application instruction, or otherwise publically-stated procedure that requires the submission of the information.⁴

The Telecommunications Act limits the authority of local jurisdictions by, among other restrictions, requiring approval within a reasonable period of time. In submitting this application, Crown Castle expressly reserves all of its Federal and State Rights, including, without limitation, its rights under federal and state law to challenge the requirement for a discretionary permit for its proposed installation. Neither the act of submitting the application nor anything contained therein shall be construed as a waiver of any such rights.

¹ *In re Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review*, Declaratory Ruling, 24 FCC Rcd. 13994 ¶¶ 32, 45-46 (2009) ("FCC Shot Clock Order"); *In the matter of Acceleration of Broadband Deployment By Improving Wireless Facilities Siting Policies*, Report and Order, FCC 14-153, WT Docket No. 13-238, ¶ 272 (FCC Oct. 21, 2014) ("Wireless Infrastructure Order") (clarifying that DAS nodes that involve installation of new poles trigger the 150 day shot clock).

² *Wireless Infrastructure Order* at ¶¶ 257, 259.

³ *Wireless Infrastructure Order* at ¶¶ 259-260.

⁴ *Id.*

13. Conclusion

Crown Castle is seeking approval of a conditional use permit for a new communication facility within the General Commercial zone. Crown has designed the equipment compound to be consistent with the development code and the uses in the CG zoning district. The close proximity to the existing site will ensure AT&T and Verizon will maintain their existing coverage.

- The proposed site will not cause an adverse impact on adjacent property or properties in the area.
- The proposed site will not cause a significant increase in vehicular or pedestrian traffic in the adjacent areas;
- The proposed site will not cause the emission of odor, dust, gas, noise, vibration, smoke, heat or glare at a level exceeding ambient conditions;
- The proposed site will not contribute in a measurable way to the deterioration in the neighborhood or area or contribution to the lowering of property values.

Please send all written requests for additional information regarding this application to the following individuals:

JACOB SPARKS

Site Development Project Manager
CCRE – Northern California Market
T: (941) 309-4617 | M: (979) 551-5148

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