

PROJECT NARRATIVE & JUSTIFICATION
NEW TELECOMMUNICATIONS FACILITY CONDITIONAL USE PERMIT APPLICATION
PSTC SROSA01 (AT&T CCL02094) – NORTHPOINT

Submitted to City of Santa Rosa
Planning and Economic Development

Applicant: Public Safety Towers, LLC

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Property Owner: Giffen Avenue Property, LLC
106 4th St.
Santa Rosa CA 95404

Project Address: 2715 Giffen Ave.
Santa Rosa CA 95407

Description & Tax Lot: 38.417544, -122.750464, APN: 010-450-008-000

Zoning Classification: IL (Light Industrial)

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1. PROJECT OVERVIEW

PSTC is proposing to build a new wireless communications facility (“Facility”), SROSA01 (CCL02904) – Northpoint, at the above noted project address. This Facility will include space for up to (3) carriers – one of which will be AT&T. This Facility is intended to add FirstNet coverage as well as improve data throughput and overall service quality, for AT&T, in the area around the proposed site to ensure sufficient, continuous and uninterrupted outdoor, in-vehicle, and in-building wireless service resulting in fewer dropped calls, faster data speeds, and improved access to additional wireless services that the public now demands.

2. PUBLIC SAFETY TOWERS OBJECTIVES & SERVICES

Founded in 2019, Public Safety Towers, LLC (“PSTC”) provides critical communication infrastructure solutions to wireless network gaps affecting the ability of numerous public safety entities to coordinate in the event of an emergency. Our mission is to integrate the needs of the community with those of emergency responders to deliver strategically placed, commercially viable wireless infrastructure.

While PSTC approaches every tower as public safety-first infrastructure, we are only able to do so because we also engage with the commercial operators. Without a concerted effort to maximize commercial cellular collocations, our business model would not allow us to sufficiently discount the rates of public safety tenants (our mission). As such, we have a dedicated carrier marketing team who proactively solicits and encourages collocation from all operators. We have established, and regular, communications with each of the operators’ relevant market teams for any tower in development.

3. PROPOSED PROJECT DETAILS

Information regarding the proposed Facility and PSTC’s response to Staff concerns:

20-44.060 *Telecommunication facilities shall be as small as possible and the minimum height necessary without compromising reasonable reception or transmission*

PSTC Response PSTC is proposing an 80ft faux tree (85ft top of tree, 80ft top of steel/antennas) all surrounded by a 6ft CMU wall secured by a 12ft wide locked access gate. Wall will be designed (painted and textured) to match the surrounding area.

While 80ft does exceed the height limit for the underlying zone, this height is necessary for the proper function of the facility. An 80ft tower, at this location, gives AT&T/FirstNet the centerline required (at 76ft) to meet the needed demand for the area as shown in the accompanying coverage maps.

The coverage maps also show how said coverage is slightly diminished at each lowered level (65’, 55’). In addition to the diminished coverage at each lower level, the proposed tower now becomes less attractive to additional carriers for collocation. When future carriers arrive at this location with the need for

coverage, there would not be a collocatable tower due to the significantly reduced centerline they would receive.

The additional height required at this location is not only needed to meet coverage objectives for AT&T/FirstNet and future collocators, but is needed to clear existing structures in the area (trees and buildings). These structures would, essentially, block the signal for the carriers on the tower and would render one entire location (sector) useless. Where the existing buildings are not nearly as tall as the trees, they do, however, take up a much larger footprint. Part of needing the height required in this location is so that AT&T/FirstNet are to clear structures through height, but also be able to clear wide building footprints in the area.

Approving an 80ft tower for PSTC, in this location, to not only AT&T/FirstNet in terms of coverage, but also, for any future carriers and their ever-growing need for coverage and capacity at this location.

*Additional
Details*

PSTC's current proposal sits in the center of AT&T/FirstNet's search ring which would then provide the ideal coverage solution for the area. In addition, no other providers have reliable coverage in this area making this a very attractive location for collocation.

4. AT&T NETWORK SERVICES & OBJECTIVES

4.1. Demand for Wireless Services in Santa Rosa

Wireless demand is growing, and robust wireless networks are essential to businesses and residences throughout the City of Santa Rosa. Approximately 70% of all U.S. households are wireless only;¹ in California, 87% of 911 calls come from wireless devices². Additionally, since 2007, data usage on AT&T's network has grown 730,000%.³ As such, AT&T is upgrading and expanding its wireless communications network in the City of Henderson to support the latest 5G and 4G LTE technology. 5G and 4G stand for "5th Generation" and "4th Generation" and LTE stands for "Long Term Evolution." These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality. This technology is the next step in increasing broadband speeds to meet the demands of users and the variety of content accessed over mobile networks, and it is necessary to facilitate capabilities that are being designed into the latest devices. 5G is the next generation of wireless technology expected to deliver latency and capacity enhancements that will enable revolutionary new capabilities for consumers and businesses.

¹ Per the National Center for Health Statistics, Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2022, Released December 2022

² <https://www.911.gov/issues/911-stats-and-data/>

³ <https://www.business.att.com/content/dam/attbusiness/briefs/3G-faq-messaging.pdf>

This proposed facility is intended to improve coverage and capacity in industrial and residential areas surrounding the subject site. AT&T/FirstNet will fill gaps from existing sites; specifically, the proposed site will improve data throughput and quality that is critical to providing the best mobile experience.

4.2 FirstNet

In addition to providing customers with reliable coverage, fast speeds, and excellent quality, the proposed project will include facilities to support the Nationwide Public Safety Broadband Network ("**FirstNet**"). In its partnership with the First Responder Network Authority, AT&T is responsible for building, maintaining, and upgrading the FirstNet network for the next 25 years. In order to support FirstNet, AT&T is upgrading its existing wireless sites and building new wireless facilities throughout the United States, including the City of Santa Rosa. AT&T's upgrades include deployment of the new frequency band ("**Band 14**") supporting the FirstNet network. In 2012, the U.S. Congress set aside Band 14 for use by first responders. FirstNet Built with AT&T is designed to be reliable, functional, safe, and secure, and it will provide optimal levels of operational capacity at all times. During the 2017 Tubbs Fire, wireless communications systems were saturated; as a result, first responder communications were impacted greatly.

FirstNet's benefits include:

- Always on, 24x7 **priority and preemption** for First Responders across data and voice communications;
- A physically separate and highly secure network core that is fully dedicated to FirstNet – utilizing end to end encryption and keeping public safety and emergency management traffic separate from commercial traffic thus preventing the need for first responders from needing to compete for access to consumer/commercial wireless access; and
- A dedicated fleet of portable network deployable assets to support first responder and emergency manager connectivity for planned events, emergencies, in extremis, and other mission requirements.