

From: [Roberts, Eric](#)
To: [Kevin Gallagher](#)
Cc: [Baptiste, Erica](#); [Powell, Greg](#)
Subject: 849 Keokuk - Tolling Agreement
Date: Thursday, November 11, 2021 2:26:24 PM
Attachments: [Please DocuSign Petaluma St Vincent Extensio.pdf](#)

Hi Kevin,

Thank you for your patience – see the attached signed tolling agreement extending the shot clock deadline through March 23, 2022. Please do not hesitate to reach out with any other questions.

Best,
Eric

Eric Roberts, AICP

Assistant Planner
City of Petaluma | Community
Development
office. 707-778-4317 |
eroberts@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: [Roberts, Eric](#)
To: [Kevin Gallagher](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); rich.busch@wirelesscounsel.com; [Danly, Eric](#); [Brady, Dylan](#); [Hines, Heather](#)
Subject: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Thursday, October 21, 2021 4:49:59 PM

Kevin,

Thank you for your email with the proposed tolling agreement. The City appreciates the offered tolling agreement and is interested in entering into a tolling agreement with AT&T. First, in an effort to ensure that the tolling agreement provides both parties with sufficient time to prepare and process the application, staff would like to make you and AT&T aware of several issues with the application that must be addressed before an approval can be issued.

Based on City staff's review of the application materials, the following information and materials from the City's publicly stated application requirements are still missing, incomplete, or insufficient:

1. **Missing equipment in Site Plans:** The submitted site plans are incomplete pursuant to the requirements in Petaluma Municipal Code ("PMC") § 14.44.130.A and the Telecommunications Facility Application Checklist. The site plans fail to identify the equipment to be installed in the existing indoor equipment rack for this proposed facility. Please provide revised complete plans that clearly identify what equipment will be installed inside the interior room, including manufacturer, model number and dimensions, including the volume for all non-antenna equipment. Without this information, the City cannot verify that the proposed facility is a qualifying "small wireless facility" as defined by the FCC and that the corresponding small wireless facility shot clock applies as alleged by AT&T.
2. **Noncompliant proposed facility design:** The proposed facility design does not appear to comply with several requirements of the PMC including:
 - a. PMC § 14.44.090.J requires the materials for the facility to be "of a color and type that blends with the surroundings to the greatest extent possible"
 - b. PMC § 14.44.170 requires all facilities to be "designed to blend into the surrounding environment to the greatest extent feasible"
 - c. PMC § 14.44.170.G requires components to be painted with a "flat" paint to "minimize their visibility to the greatest extent feasible"
 - d. PMC § 14.44.170.I requires special design where particularly sensitive elements such as "community features" may be impacted by the facility. This proposed facility is located in a Community Facility zone and the property serves the community as a high school, necessitating special design
 - e. PMC § 14.44.190 requires all facilities to "be located as to minimize their visibility";

f. PMC §_14.44.190.E requires facilities on a site without existing telecommunication facilities to “blend with the surrounding existing natural and manmade environment in such a manner as to be effectively unnoticeable”

g. PMC § 14.44.280.A requires facilities to be “located, designed and screened to blend with the existing natural or built surroundings as to reduce visual impacts to the extent feasible considering the technological requirements of the proposed telecommunication service and the need to be compatible with neighboring residences and the character of the community”

h. PMC § 14.44.280.B requires the facility to be “designed to blend with any existing supporting structure” and “not substantially alter the character of the structure or local area”

The proposed facility currently consists of bare equipment mounted on the pole extending out of the roof and does not blend into the structure/building on which it is mounted. The current plans also do not indicate whether or how the proposed facility would be painted.

Concealing the roof-mounted antenna and equipment to resemble a typical building feature such as a vent pipe rising out of the rooftop and painting the concealed facility a flat color consistent with the existing building would seem to be an apparently easy way to blend the proposed facility with the surrounding buildings and minimize the proposed facility’s visibility in compliance with the requirements of the PMC. Staff remains open to alternative concealment strategies that AT&T may wish to propose. Note, the site plans and photo simulations must be revised accordingly with any design changes to the proposed facility.

3. **Alternative site analysis:** The submitted application materials do not include the alternative site analysis required by PMC §§ 14.44.130.A and 14.44.210.A and the Telecommunications Facility Application Checklist. AT&T’s Project Support Statement is insufficient to meet this alternative site analysis requirement because it contains only bare conclusions not factually supported. A meaningful comparative analysis and such technical information and other factual justification are necessary to document the reasons why alternative site locations are unacceptable, infeasible, unavailable or not consistent with the standards in the PMC or Implementing Zoning Ordinance. This analysis is required to make the findings in Petaluma Implementing Zoning Ordinance § 24.030.H because PMC § 14.44.210.A requires the decision making body to receive and approve the alternative analysis described above.

4. **Service area maps and network maps:** The submitted application materials do not include the service area maps and network maps required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. The small coverage range of this proposed facility alleged on both the Telecommunications Facility Application Checklist and AT&T’s Project Support Statement are insufficient to show AT&T’s current and predicted service coverage in the area for all active frequencies that this proposed facility would utilize.

5. **Master plan:** The submitted application materials do not include the master plan for all of AT&T's related facilities within the City limits, plus one-quarter mile from the City's urban limit line, showing all existing sites or candidate sites under consideration as required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. This requirement is applicable to all proposed wireless facilities regardless of proposed or alleged coverage range.

6. **Recent title report for the property:** The submitted application materials do not include the title report for the property required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. AT&T's statement that it does not believe there is ambiguity as to the ownership of the property because the location has operated as a Catholic school for a long period of time is insufficient to fulfill this requirement.

7. **Documentation identifying AT&T's legal access to the site:** AT&T's General Application Form is signed by a Mr. Patrick W. Daly as Principal of St. Vincent de Paul High School as the property owner. Without a title report, the City cannot verify the property owner, and in turn, cannot verify if Mr. Daly is the property owner or has the requisite authority to sign this application form on behalf of the property owner.

If Mr. Daly is not the property owner, supporting documentation from the property owner that Mr. Daly has been delegated authority to sign such application forms on the owner's behalf (e.g., a signed letter of authorization or evidence that Mr. Daly's official position within the Church empowers him to bind the property owner) is required.

If Mr. Daly does not have the requisite authority but another individual does, please provide supporting documentation from the property owner about that individual's authority and new application forms signed by such individual.

Application forms signed by the property owner or supporting documentation from the property owner authorizing another representative to sign the application forms will fulfill this requirement identifying AT&T's legal access to the site required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist.

8. **Neighborhood Outreach and Public Notification:** As we have previously discussed by email, AT&T has not yet conducted the neighborhood outreach and public notification required for projects requiring public hearings pursuant to City Council Resolution No. 2018-107 N.C.S.

9. **Telecommunications Carriers & Providers Registration Form:** Pursuant to PMC § 14.44.030.K and 14.44.040, please provide a copy of AT&T's Telecommunications Carriers & Providers Registration Form, or please submit this form and associated fee if AT&T is not currently registered with the City.

For the above reasons of missing, incomplete, and insufficient application information and materials,

noncompliant proposed facility design, and lack of neighborhood outreach and public notification, City staff cannot at this time recommend that the Planning Commission approve this proposed project. The City acknowledges that this request for the missing, incomplete, and insufficient application information and materials may no longer pause or toll the shot clock for this application, but the City reiterates that without such information and materials described in the City's publicly stated application requirements, City staff cannot recommend that the Planning Commission approve this proposed project.

However, City staff would like to continue working with you and AT&T to obtain the required application materials, revise the proposed facility design to meet the requirements of the PMC, and complete the public notice process.

Your last email states that the shot clock expires today, October 21, 2021. If the 60-day small wireless facilities shot clock is applicable, the shot clock does not expire today. You submitted the initial application on July 22, 2021. The City responded with an incomplete notice on July 27, 2021, within 10 days of your initial submission, tolling the shot clock. You resubmitted the application on August 27, 2021, which reset the shot clock to day zero. Assuming the 60-day shock clock applies, the shot clock expires following October 26, 2021.

Your previous email mentioned a possible Planning Commission hearing date of November 30, 2021, and AT&T's tolling agreement proposes a shock clock deadline of 11:59 p.m. on January 7, 2022. Unfortunately, the November 30, 2021, Planning Commission agenda is full and cannot accommodate additional hearings.

If you and AT&T are able to submit the above described information and materials by November 4, 2021, City staff will be able to review the information and materials and schedule this application or a Planning Commission hearing on the December 14, 2021, agenda. Assuming AT&T is able to submit its materials by November 4, 2021 and have the application heard on the December 14, 2021, Planning Commission agenda, the City proposes tolling the shot clock through 11:59 p.m. on February 8, 2022. That date will allow enough time for the City to schedule any Planning Commission appeal requests to be heard by City Council.

Please advise if AT&T is willing to enter into such a tolling agreement through February 8, 2022, or a later date if AT&T believes it will require more time to submit the required information and materials, and let me know if you have any questions about any of the above.

Best,
Eric

Eric Roberts
Assistant Planner
City of Petaluma | Community
Development
office. 707-778-4317 |
eroberts@cityofpetaluma.org



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Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: [Roberts, Eric](#)
To: [Kevin Gallagher](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#)
Subject: 849 Keokuk AT&T Telecomm Project
Date: Wednesday, October 6, 2021 11:45:52 AM
Attachments: [Resolution 2018-107 N.C.S. 06182018.pdf](#)
[Petaluma Sign Companies.xlsx](#)
[image001.png](#)
[image002.png](#)

Hi Kevin,

Per our discussion yesterday evening, the City of Petaluma is using authority under [Petaluma Municipal Code 14.44.100](#) to elevate review of the subject proposal for consideration of the Planning Commission on October 26, 2021 at 7:00 PM. I am hopeful you will be available to represent the project. I also mentioned that the City is tracking a shot clock end date of October 30th – please let me know if you would like a timeline of events for this conclusion.

Secondly, I wanted to discuss the City’s notification process. Per the attached Resolution 2018-107, a sign must be posted no less than 17 days prior to the hearing date. For this project, **the sign must be posted by Saturday, October 9**. Additionally, a neighborhood outreach meeting must be held prior to the hearing date. For this project, **the neighborhood outreach meeting must be noticed to residents within a 1,000 foot radius at least 10 days prior to the outreach meeting**. I am happy to provide additional details on these processes.

With regard to the sign posting, I have attached a brief list of local sign companies you may wish to use. I’ve summarized other information below for sign requirements:

Min. Size:	32 square feet
Height:	Not to exceed 6 feet total height.
Location:	Not less than 0 feet and no more than 10 feet inside the property line
Number:	Two. One per each street frontage (Cherry St. and Keokuk St.)
Board Materials:	Painted plywood and calendar vinyl, or Coroplast, Sentra, Procelain, Medium density overlay (MDO)
Background Color:	Pantone 280C
Lettering Color:	White
Style of Type:	Univers Condensed
Logo:	City of Petaluma
Installation:	Post set a minimum 18” in the ground, set in sand

Regarding required language, we are hoping to get this to you by end of day today or early tomorrow.

Finally, I am aware that you would like to enter a tolling agreement for the project. We are open to this and will await a proposed agreement at your convenience. Please reach out if you have any questions.

Best,

Eric

Eric Roberts, Assistant Planner

M-Group Consulting City Planners

Serving the City of Petaluma | [11 English Street, Petaluma, CA 94952](#)

he/him

Phone: (707) 778-4317

Hours: Monday-Thursday 8am-5pm, closed Fridays



Eric Roberts

Assistant Planner

City of Petaluma | Community Development

office. 707-778-4317 |

eroberts@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: [Kevin Gallagher](#)
To: [Roberts, Eric](#); [Harrison, Daniel](#); [Robbe, Tiffany](#)
Cc: [PetalumaPlanning](#); [Powell, Greg](#); [Maria Kim](#)
Subject: Electronic Submittal - Minor Telecommunications Facility - AT&T Small Cell Facility at St. Vincent de Paul HS
Date: Friday, August 27, 2021 5:04:21 PM
Attachments: [Revised Project Support Statement - St. Vincent DePaul HS.pdf](#)
[Telecomm Application Checklist - St Vincent De Paul.pdf](#)
[Minor CUP Checklist - St Vincent de Paul.pdf](#)
[Antenna Specifications NNV4SSP-360S-F4 - St Vincent De Paul HS.pdf](#)
[General Application - St Vincent De Paul HS.pdf](#)
[Cost Recovery Form - St Vincent de Paul HS.pdf](#)
[Environmental Impact Questionnaire - Vincent De Paul HS.pdf](#)
[SPAR Checklist - St Vincent De Paul HS.pdf](#)
[Site Plans - St Vincent De Paul HS.pdf](#)
[Structural Calcs - St Vincent DePaul HS.pdf](#)
[RF Study- St Vincent de Paul.pdf](#)
[Full Photo Sims - St. Vincent De Paul HS.pdf](#)

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Adding Tiffany Robbe per Eric's out of office message.

Many thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Kevin Gallagher
Sent: Friday, August 27, 2021 4:56 PM
To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>; Harrison, Daniel <dharrison@cityofpetaluma.org>
Cc: PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>
Subject: RE: Electronic Submittal - Minor Telecommunications Facility - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Eric,

Please find enclosed our updated submittal for a small cell facility on the roof of St. Vincent De Paul High School.

The following new documents are attached:

- Revised Project Support Statement
- Telecomm Application Checklist
- Minor CUP Checklist
- Antenna Specifications for the proposed site's antenna.

For your convenience, I've also attached the following documents that were previously submitted:

- General Application
- Cost Recovery Form
- Environmental Impact Questionnaire
- SPAR Checklist
- Site Plans
- Structural Calculations
- RF Study
- Photo Simulations

Please be advised that this site qualifies as a small cell facility under FCC guidelines, which come with a 60 day final action shot clock. Under AT&T's interpretation of the rules, we are tracking an original electronic submittal date of 7/22 per the below, with timely notice of incomplete on 7/27 in the form of Daniel's email below tolling the clock. Please this response a full and complete response to your notice of incomplete.

Please advise if there's anything further you need – in the interest of transparency, there were a couple items that were not pertinent to a 20 watt antenna covering a single parcel that we have not included.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Friday, July 30, 2021 4:35 PM

To: Kevin Gallagher <KGallagher@completewireless.net>; Harrison, Daniel <dharrison@cityofpetaluma.org>

Cc: PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Kevin,

I'll do my best to clarify where the requirements stand for this submittal: while my email on 4/5 provided information primarily with the thought that the proposed facility was a *Mini* facility, submitted plans indicate that the facility is not subject to that classification. Petaluma Municipal Code ([PMC](#)) [Title 14.44.020\(S\)\(3\)](#) also excludes omni antennas as Mini facilities, whereas Minor

facilities may include omni antennas up to 4 inches in diameter. Additionally, Mini facilities are generally for the sole use by occupants of the parcel on which the facility will locate.

Note as well that *all requirements* outlined in [PMC Title 14.44.090](#) must be met for the Minor facility; if these are exceeded, then the facility becomes Major. For example, if the combined effective radiated power radiated by all the antenna present on the parcel is greater than one thousand five hundred (1,500) watts, then the project becomes elevated to a *Major* facility. In the RF report, I was not able to locate that information.

In addition to what you have prepared an application for, a Minor Conditional Use Permit is also requested for this site. I recommend using the attached checklist to go through the requirements for both Minor SPAR and Minor CUP submittals.

Please let us know if you have further questions regarding this submittal.

Best,
Eric

Eric Roberts

Assistant Planner
City of Petaluma | Community
Development
office. [707-778-4317](tel:707-778-4317) |
eroberts@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Wednesday, July 28, 2021 6:27 PM

To: Harrison, Daniel <dharrison@cityofpetaluma.org>

Cc: PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>; Roberts, Eric <eroberts@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

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Hi Daniel,

Thank you for the response.

In all honesty, I'm still a bit unclear on the requirements in play here. In the 4/5 email from Eric Roberts that you reference below, Eric said the facility was likely a Mini Telecommunications Facility and we prepared our submittal materials accordingly. I fully understand that staff have every right, upon further review, to adjust that conclusion as warranted, but I'd appreciate a bit more guidance regarding your determination that the facility does not qualify as a mini facility. Per the materials we submitted, this is a 26 inch tall antenna to be installed at 17'2" off the ground at its highest point on a building that's 26'5" tall at its highest point, the purpose of which is to serve the campus on which it sits. It complies with all FCC regulations.

I'm happy to provide additional information as requested for Minor Facility application if that's what the code requires but I'd like to confirm this doesn't qualify as a mini facility based on what we provided.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Harrison, Daniel <dharrison@cityofpetaluma.org>

Sent: Tuesday, July 27, 2021 5:15 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>; Roberts, Eric <eroberts@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Kevin,

Upon further review of the submitted materials, application materials are insufficient for submittal of both a SPAR and CUP (Minor) for what appears to be a minor Telecommunications Facility. The email drafted by Eric Roberts on 4/5/2021 provided information relative to the type of facility proposed (Mini, Minor, Major) which from submittal materials appears more clear. Per the attached Telecom Handout and Implementing Zoning Ordinance [7.900](#) (B), Minor Telecommunications Facilities requires approval of a minor [conditional use](#) permit as prescribed in Section [24.030](#) and administrative site plan and architectural review approval as prescribed in Section [24.010](#).

To submit for the necessary CUP and SPAR, please review the attached materials and demonstrate that the Petaluma Municipal Code [14.44.090](#) criteria are met to be defined as reviewed as a Minor

Telecommunications facility. Conditional Use Permit application materials are also attached to this email. The cost of a Minor/Administrative CUP is \$2,341.41 + Time and Materials.

Let us know if you have any questions.

Best,

Daniel Harrison

Assistant Planner
City of Petaluma | Planning
dharrison@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Tuesday, July 27, 2021 1:17 PM

To: Harrison, Daniel <dharrison@cityofpetaluma.org>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

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Hi Daniel,

No inconvenience at all!

Please let me know if there's anything further you need.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Harrison, Daniel <dharrison@cityofpetaluma.org>

Sent: Tuesday, July 27, 2021 1:06 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Kevin,

My colleague, Eric Roberts (who I believe you have corresponded to regarding this proposal) is currently confirming some details regarding this application. We will call you before the end of the day. Sorry for any inconvenience.

Thanks,

Daniel Harrison

Assistant Planner

City of Petaluma | Planning

dharrison@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Tuesday, July 27, 2021 12:05 PM

To: Harrison, Daniel <dharrison@cityofpetaluma.org>; PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

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Sounds good, I will be expecting your call.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Harrison, Daniel <dharrison@cityofpetaluma.org>
Sent: Tuesday, July 27, 2021 12:04 PM
To: Kevin Gallagher <KGallagher@completewireless.net>; PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>
Cc: Steve Proo <SProo@completewireless.net>
Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Kevin,

Thanks for getting back to me. I will call around 1pm.

Best,

Daniel Harrison

Assistant Planner
City of Petaluma | Planning
dharrison@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>
Sent: Tuesday, July 27, 2021 11:22 AM
To: Harrison, Daniel <dharrison@cityofpetaluma.org>; PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>
Cc: Steve Proo <SProo@completewireless.net>
Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

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Hi Daniel,

I will be free anytime in that window from this moment forward.

Does 1 PM work for you?

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Harrison, Daniel <dharrison@cityofpetaluma.org>

Sent: Monday, July 26, 2021 1:36 PM

To: Kevin Gallagher <KGallagher@completewireless.net>; PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>

Cc: Maria Kim <MKim@completewireless.net>; Steve Proo <SProo@completewireless.net>

Subject: RE: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

Hi Kevin,

Thanks for your email.

We are currently able to take credit card payment on Tuesdays and Thursdays between 10am and 2pm. Is there a time during these hours tomorrow (7/27) that would work for Planning staff to call you for payment? Please confirm and provide the best telephone number to call.

The deposit for a Minor/Administrative Site Plan and Architecture (SPAR) review is \$2,256.30 per the attached fee schedule.

Let me know if you have any questions.

Best,

Daniel Harrison

Assistant Planner

City of Petaluma | Planning

dharrison@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Thursday, July 22, 2021 6:50 PM

To: PetalumaPlanning <PetalumaPlanning@cityofpetaluma.org>

Cc: Maria Kim <MKim@completewireless.net>; Steve Proo <SProo@completewireless.net>

Subject: Electronic Submittal - Minor SPAR - AT&T Small Cell Facility at St. Vincent de Paul HS

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Hello,

I was instructed by staff that the City of Petaluma is currently processing submittals electronically, with fees being accessed and charged upon receipt (with a processing fee for credit cards).

Please accept the enclosed as a formal submittal for a Minor SPAR for an AT&T Small Cell Facility at St. Vincent de Paul HS. Enclosed are the following:

- General Application
- SPAR Checklist
- Environmental Impact Questionnaire (we believe the facility is CEQA exempt)
- Project Support Statement
- Cost Recovery Form
- Site Plans
- Full Photo Simulations
- RF Study

Please let me know if there's anything further you need. My contact info is below.

Many thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: [Baptiste, Erica](#)
To: [Kevin Gallagher](#); [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Maria Kim](#)
Subject: Re: 849 Keokuk - Tolling Agreement - AT&T ref - St. Vincent De Paul HS
Date: Friday, November 12, 2021 11:49:19 AM

Hi Kevin -

I had staff pull some other wireless cost recovery reports for an estimate and it seems two of them were between \$10k and \$19k. We did have an application that went to Planning Commission several times, and was highly contentious, that was significantly higher than the average.

Hopefully this helps.

Erica

Erica Baptiste

Planning Manager
City of Petaluma | Community
Development
ebaptiste@cityofpetaluma.org



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From: Kevin Gallagher <KGallagher@completewireless.net>
Sent: Thursday, November 11, 2021 3:25 PM
To: Roberts, Eric <eroberts@cityofpetaluma.org>
Cc: Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>
Subject: RE: 849 Keokuk - Tolling Agreement - AT&T ref - St. Vincent De Paul HS

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Hi Eric,

Thanks, I have passed it on to AT&T.

Per my email yesterday, we will need to have some idea of what the costs are going to look like for

this project.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Thursday, November 11, 2021 2:26 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Powell, Greg <GPOWELL@cityofpetaluma.org>

Subject: 849 Keokuk - Tolling Agreement

Hi Kevin,

Thank you for your patience – see the attached signed tolling agreement extending the shot clock deadline through March 23, 2022. Please do not hesitate to reach out with any other questions.

Best,

Eric

Eric Roberts, AICP

Assistant Planner

City of Petaluma | Community

Development

office. [707-778-4317](tel:707-778-4317) |

eroberts@cityofpetaluma.org



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From: [Kevin Gallagher](#)
To: [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); [Maria Kim](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Friday, November 5, 2021 3:15:48 PM

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Hi Eric,

Apologies for any ambiguity below. On 11/2, I was not requesting verification our application materials submitted thus far are adequate for a public outreach meeting. My intent was to explain that AT&T does not wish to hold a public outreach meeting until it has gathered the additional materials the City requested and staff have had a chance to review them and confirm they are satisfied as to the material's completeness. We don't want to find ourselves in a position where we conduct a public outreach meeting and are then obliged to conduct a second one.

We disagree with your contention that the scope of the concerns raised warrant multiple outreach meetings. Of the comments you forwarded to me, Mr. Lee's was a complaint about the City planning process. Ms. Obaid's was a complaint that the City had not revised its wireless ordinance in time for it to apply to AT&T's application. Ms. Purcell's was comment was devoted to arguing FCC standards for wireless emissions should be substantially lower. (As the 3rd party RF study we provided notes, the proposed facility's maximum emissions at ground level comes in at 0.26% of the FCC general public exposure limits.) Finally, Mr. McGavin's comments are another complaint about City staff and a copy of a letter he sent to the principal of St. Vincent De Paul High School. These folks appear to want a townhall with the City on the wireless code, not a discussion of this particular project with AT&T.

Before we proceed further on this, we'd like know what kind of costs we can reasonably expect going forward to hearing. We've already gotten a pretty substantial invoice from the City for a project that has not yet gone to hearing, and my concern is that now that the public has been notified of this project, there's an expectation that AT&T is going to be on the hook for all staff time relating to complaints about the wireless code. Given that our timeline is going all the way out to March, we're concerned that fees are going to spiral out of control relative to the size of the project.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Thursday, November 04, 2021 7:44 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin,

Thank you for consideration of the City's proposed timeline and your revised tolling agreement. I wanted to circle back to your request in your 11/2 email for verification that your materials are satisfactory for the outreach meeting. The City has been sent concerns by the community through email, in-person inquiries, and at City Council. I have attached email comments received as of yesterday, 11/3 for your review. It would be best to address these concerns at the neighborhood meeting, and provided the scope of the concerns, I recommend considering hosting multiple neighborhood outreach meetings. The City recommends holding neighborhood outreach as early as possible to obtain community feedback, however with comments already in hand, I advise using this information to help gauge when to hold the meeting. This way, community feedback may help inform preparation of materials, such as the alternative sites analysis.

On the topic of resubmittal materials, do you have a timeline of when we can expect to have the requested materials submitted?

Please feel free to reach out with any questions,

Best,
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Sent: Wednesday, November 03, 2021 2:46 PM

To: Roberts, Eric <eroberts@cityofpetaluma.org>
Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;
Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim <MKim@completewireless.net>
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

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Hi Eric,

I just spoke with Greg. Given the noticing times and the additional information that will need to be provided and reviewed by the City, we both agree that the December 14th hearing date is not going to be feasible. A January date seems more reasonable – that will still give us time for any appeals within the shot clock period.

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Sent: Tuesday, November 02, 2021 3:35 PM
To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>
Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;
Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim (<MKim@completewireless.net>
<MKim@completewireless.net>
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

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I also wanted to follow up if you need anything to host the neighborhood meeting. If notice can go out this week, the meeting could feasibly take place before the Thanksgiving holiday.

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Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin,

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meeting. Please let me know if you need anything else at this time.

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Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; rich.busch@wirelesscounsel.com; Danly, Eric <EDanly@cityofpetaluma.org>; Brady, Dylan <DBRADY@cityofpetaluma.org>; Hines, Heather <hhines@cityofpetaluma.org>
Subject: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Kevin,

Thank you for your email with the proposed tolling agreement. The City appreciates the offered tolling agreement and is interested in entering into a tolling agreement with AT&T. First, in an effort to ensure that the tolling agreement provides both parties with sufficient time to prepare and process the application, staff would like to make you and AT&T aware of several issues with the application that must be addressed before an approval can be issued.

Based on City staff's review of the application materials, the following information and materials from the City's publicly stated application requirements are still missing, incomplete, or insufficient:

1. **Missing equipment in Site Plans:** The submitted site plans are incomplete pursuant to the requirements in Petaluma Municipal Code ("PMC") § 14.44.130.A and the Telecommunications Facility Application Checklist. The site plans fail to identify the equipment to be installed in the existing indoor equipment rack for this proposed facility. Please provide revised complete plans that clearly identify what equipment will be installed inside the interior room, including manufacturer, model number and dimensions, including the volume for all non-antenna equipment. Without this information, the City cannot verify that the proposed facility is a qualifying "small wireless facility" as defined by the FCC and that the corresponding small wireless facility shot clock applies as alleged by AT&T.
2. **Noncompliant proposed facility design:** The proposed facility design does not appear to comply with several requirements of the PMC including:
 - a. PMC § 14.44.090.J requires the materials for the facility to be "of a color and type that blends with the surroundings to the greatest extent possible"
 - b. PMC § 14.44.170 requires all facilities to be "designed to blend into the surrounding environment to the greatest extent feasible"
 - c. PMC § 14.44.170.G requires components to be painted with a "flat" paint to

“minimize their visibility to the greatest extent feasible”

d. PMC § 14.44.170.I requires special design where particularly sensitive elements such as “community features” may be impacted by the facility. This proposed facility is located in a Community Facility zone and the property serves the community as a high school, necessitating special design

e. PMC § 14.44.190 requires all facilities to “be located as to minimize their visibility”;

f. PMC § 14.44.190.E requires facilities on a site without existing telecommunication facilities to “blend with the surrounding existing natural and manmade environment in such a manner as to be effectively unnoticeable”

g. PMC § 14.44.280.A requires facilities to be “located, designed and screened to blend with the existing natural or built surroundings as to reduce visual impacts to the extent feasible considering the technological requirements of the proposed telecommunication service and the need to be compatible with neighboring residences and the character of the community”

h. PMC § 14.44.280.B requires the facility to be “designed to blend with any existing supporting structure” and “not substantially alter the character of the structure or local area”

The proposed facility currently consists of bare equipment mounted on the pole extending out of the roof and does not blend into the structure/building on which it is mounted. The current plans also do not indicate whether or how the proposed facility would be painted.

Concealing the roof-mounted antenna and equipment to resemble a typical building feature such as a vent pipe rising out of the rooftop and painting the concealed facility a flat color consistent with the existing building would seem to be an apparently easy way to blend the proposed facility with the surrounding buildings and minimize the proposed facility’s visibility in compliance with the requirements of the PMC. Staff remains open to alternative concealment strategies that AT&T may wish to propose. Note, the site plans and photo simulations must be revised accordingly with any design changes to the proposed facility.

3. **Alternative site analysis:** The submitted application materials do not include the alternative site analysis required by PMC §§ 14.44.130.A and 14.44.210.A and the Telecommunications Facility Application Checklist. AT&T’s Project Support Statement is insufficient to meet this alternative site analysis requirement because it contains only bare conclusions not factually supported. A meaningful comparative analysis and such technical information and other factual justification are necessary to document the reasons why alternative site locations are unacceptable, infeasible, unavailable or not consistent with the standards in the PMC or Implementing Zoning Ordinance. This analysis is required to make the findings in Petaluma Implementing Zoning Ordinance §

24.030.H because PMC § 14.44.210.A requires the decision making body to receive and approve the alternative analysis described above.

4. **Service area maps and network maps:** The submitted application materials do not include the service area maps and network maps required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. The small coverage range of this proposed facility alleged on both the Telecommunications Facility Application Checklist and AT&T's Project Support Statement are insufficient to show AT&T's current and predicted service coverage in the area for all active frequencies that this proposed facility would utilize.

5. **Master plan:** The submitted application materials do not include the master plan for all of AT&T's related facilities within the City limits, plus one-quarter mile from the City's urban limit line, showing all existing sites or candidate sites under consideration as required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. This requirement is applicable to all proposed wireless facilities regardless of proposed or alleged coverage range.

6. **Recent title report for the property:** The submitted application materials do not include the title report for the property required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. AT&T's statement that it does not believe there is ambiguity as to the ownership of the property because the location has operated as a Catholic school for a long period of time is insufficient to fulfill this requirement.

7. **Documentation identifying AT&T's legal access to the site:** AT&T's General Application Form is signed by a Mr. Patrick W. Daly as Principal of St. Vincent de Paul High School as the property owner. Without a title report, the City cannot verify the property owner, and in turn, cannot verify if Mr. Daly is the property owner or has the requisite authority to sign this application form on behalf of the property owner.

If Mr. Daly is not the property owner, supporting documentation from the property owner that Mr. Daly has been delegated authority to sign such application forms on the owner's behalf (e.g., a signed letter of authorization or evidence that Mr. Daly's official position within the Church empowers him to bind the property owner) is required.

If Mr. Daly does not have the requisite authority but another individual does, please provide supporting documentation from the property owner about that individual's authority and new application forms signed by such individual.

Application forms signed by the property owner or supporting documentation from the property owner authorizing another representative to sign the application forms will fulfill this requirement identifying AT&T's legal access to the site required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist.

8. **Neighborhood Outreach and Public Notification:** As we have previously discussed by email, AT&T has not yet conducted the neighborhood outreach and public

notification required for projects requiring public hearings pursuant to City Council Resolution No. 2018-107 N.C.S.

9. Telecommunications Carriers & Providers Registration Form: Pursuant to PMC § 14.44.030.K and 14.44.040, please provide a copy of AT&T's Telecommunications Carriers & Providers Registration Form, or please submit this form and associated fee if AT&T is not currently registered with the City.

For the above reasons of missing, incomplete, and insufficient application information and materials, noncompliant proposed facility design, and lack of neighborhood outreach and public notification, City staff cannot at this time recommend that the Planning Commission approve this proposed project. The City acknowledges that this request for the missing, incomplete, and insufficient application information and materials may no longer pause or toll the shot clock for this application, but the City reiterates that without such information and materials described in the City's publicly stated application requirements, City staff cannot recommend that the Planning Commission approve this proposed project.

However, City staff would like to continue working with you and AT&T to obtain the required application materials, revise the proposed facility design to meet the requirements of the PMC, and complete the public notice process.

Your last email states that the shot clock expires today, October 21, 2021. If the 60-day small wireless facilities shot clock is applicable, the shot clock does not expire today. You submitted the initial application on July 22, 2021. The City responded with an incomplete notice on July 27, 2021, within 10 days of your initial submission, tolling the shot clock. You resubmitted the application on August 27, 2021, which reset the shot clock to day zero. Assuming the 60-day shock clock applies, the shot clock expires following October 26, 2021.

Your previous email mentioned a possible Planning Commission hearing date of November 30, 2021, and AT&T's tolling agreement proposes a shock clock deadline of 11:59 p.m. on January 7, 2022. Unfortunately, the November 30, 2021, Planning Commission agenda is full and cannot accommodate additional hearings.

If you and AT&T are able to submit the above described information and materials by November 4, 2021, City staff will be able to review the information and materials and schedule this application or a Planning Commission hearing on the December 14, 2021, agenda. Assuming AT&T is able to submit its materials by November 4, 2021 and have the application heard on the December 14, 2021, Planning Commission agenda, the City proposes tolling the shot clock through 11:59 p.m. on February 8, 2022. That date will allow enough time for the City to schedule any Planning Commission appeal requests to be heard by City Council.

Please advise if AT&T is willing to enter into such a tolling agreement through February 8, 2022, or a later date if AT&T believes it will require more time to submit the required information and materials, and let me know if you have any questions about any of the above.

Best,
Eric

From: [Roberts, Eric](#)
To: [Kevin Gallagher](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); [Rich Busch](#); [Maria Kim](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Thursday, November 4, 2021 7:43:54 PM
Attachments: [St. Vincent High School Project File.zip](#)

Hi Kevin,

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Please advise if AT&T is willing to enter into such a tolling agreement through February 8, 2022, or a later date if AT&T believes it will require more time to submit the required information and materials, and let me know if you have any questions about any of the above.

Best,
Eric

From: [Kevin Gallagher](#)
To: [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); [Rich Busch](#); [Maria Kim](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Wednesday, November 3, 2021 2:45:59 PM

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Hi Eric,

I just spoke with Greg. Given the noticing times and the additional information that will need to be provided and reviewed by the City, we both agree that the December 14th hearing date is not going to be feasible. A January date seems more reasonable – that will still give us time for any appeals within the shot clock period.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Kevin Gallagher
Sent: Tuesday, November 02, 2021 3:35 PM
To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>
Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim (MKim@completewireless.net) <MKim@completewireless.net>
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

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The proposed facility currently consists of bare equipment mounted on the pole extending out of the roof and does not blend into the structure/building on which it is mounted. The current plans also do not indicate whether or how the proposed facility would be painted.

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6. **Recent title report for the property:** The submitted application materials do not include the title report for the property required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. AT&T's statement that it does not believe there is ambiguity as to the ownership of the property because the location has operated as a Catholic school for a long period of time is insufficient to fulfill this requirement.

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If Mr. Daly is not the property owner, supporting documentation from the property owner that Mr. Daly has been delegated authority to sign such application forms on the owner's behalf (e.g., a signed letter of authorization or evidence that Mr. Daly's official position within the Church empowers him to bind the property owner) is required.

If Mr. Daly does not have the requisite authority but another individual does, please provide supporting documentation from the property owner about that individual's authority and new application forms signed by such individual.

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From: [Kevin Gallagher](#)
To: [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); [Rich Busch](#); [Maria Kim](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Tuesday, November 2, 2021 3:34:58 PM
Attachments: [Petaluma St Vincent Extension Letter 2021.10.25.pdf](#)

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

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To: [Kevin Gallagher](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Monday, October 25, 2021 12:56:38 PM
Attachments: [849 Keokuk St 1000" buffer address list 10.21.21.xlsx](#)

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The proposed facility currently consists of bare equipment mounted on the pole extending out of the roof and does not blend into the structure/building on which it is mounted. The current plans also do not indicate whether or how the proposed facility would be painted.

Concealing the roof-mounted antenna and equipment to resemble a typical building feature such as a vent pipe rising out of the rooftop and painting the concealed facility a flat color consistent with the existing building would seem to be an apparently easy way to blend the proposed facility with the surrounding buildings and minimize the proposed facility's visibility in compliance with the requirements of the PMC. Staff remains open to alternative concealment strategies that AT&T may wish to propose. Note, the site plans and photo simulations must be revised accordingly with any design changes to the proposed facility.

3. **Alternative site analysis:** The submitted application materials do not include the alternative site analysis required by PMC §§ 14.44.130.A and 14.44.210.A and the Telecommunications Facility Application Checklist. AT&T's Project Support Statement is insufficient to meet this alternative site analysis requirement because it contains only bare conclusions not factually supported. A meaningful comparative analysis and such technical information and other factual justification are necessary to document the reasons why alternative site locations are unacceptable, infeasible, unavailable or not consistent with the standards in the PMC or Implementing Zoning Ordinance. This analysis is required to make the findings in Petaluma Implementing Zoning Ordinance § 24.030.H because PMC § 14.44.210.A requires the decision making body to receive and approve the alternative analysis described above.
4. **Service area maps and network maps:** The submitted application materials do not include the service area maps and network maps required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. The small coverage range of this proposed facility alleged on both the Telecommunications Facility Application Checklist and AT&T's Project Support Statement are insufficient to show AT&T's current and predicted service coverage in the area for all active frequencies that this proposed facility would utilize.
5. **Master plan:** The submitted application materials do not include the master plan for all of AT&T's related facilities within the City limits, plus one-quarter mile from the City's urban limit line, showing all existing sites or candidate sites under consideration as required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. This requirement is applicable to all proposed wireless facilities regardless of proposed or alleged coverage range.
6. **Recent title report for the property:** The submitted application materials do not include the title report for the property required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. AT&T's statement that it does not believe there is ambiguity as to the ownership of the property because the location has operated as a Catholic school for a long period of time is insufficient to fulfill this

requirement.

7. Documentation identifying AT&T's legal access to the site: AT&T's General Application Form is signed by a Mr. Patrick W. Daly as Principal of St. Vincent de Paul High School as the property owner. Without a title report, the City cannot verify the property owner, and in turn, cannot verify if Mr. Daly is the property owner or has the requisite authority to sign this application form on behalf of the property owner.

If Mr. Daly is not the property owner, supporting documentation from the property owner that Mr. Daly has been delegated authority to sign such application forms on the owner's behalf (e.g., a signed letter of authorization or evidence that Mr. Daly's official position within the Church empowers him to bind the property owner) is required.

If Mr. Daly does not have the requisite authority but another individual does, please provide supporting documentation from the property owner about that individual's authority and new application forms signed by such individual.

Application forms signed by the property owner or supporting documentation from the property owner authorizing another representative to sign the application forms will fulfill this requirement identifying AT&T's legal access to the site required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist.

8. Neighborhood Outreach and Public Notification: As we have previously discussed by email, AT&T has not yet conducted the neighborhood outreach and public notification required for projects requiring public hearings pursuant to City Council Resolution No. 2018-107 N.C.S.

9. Telecommunications Carriers & Providers Registration Form: Pursuant to PMC § 14.44.030.K and 14.44.040, please provide a copy of AT&T's Telecommunications Carriers & Providers Registration Form, or please submit this form and associated fee if AT&T is not currently registered with the City.

For the above reasons of missing, incomplete, and insufficient application information and materials, noncompliant proposed facility design, and lack of neighborhood outreach and public notification, City staff cannot at this time recommend that the Planning Commission approve this proposed project. The City acknowledges that this request for the missing, incomplete, and insufficient application information and materials may no longer pause or toll the shot clock for this application, but the City reiterates that without such information and materials described in the City's publicly stated application requirements, City staff cannot recommend that the Planning Commission approve this proposed project.

However, City staff would like to continue working with you and AT&T to obtain the required application materials, revise the proposed facility design to meet the requirements of the PMC, and complete the public notice process.

Your last email states that the shot clock expires today, October 21, 2021. If the 60-day small wireless facilities shot clock is applicable, the shot clock does not expire today. You submitted the initial application on July 22, 2021. The City responded with an incomplete notice on July 27, 2021, within 10 days of your initial submission, tolling the shot clock. You resubmitted the application on August 27, 2021, which reset the shot clock to day zero. Assuming the 60-day shock clock applies, the shot clock expires following October 26, 2021.

Your previous email mentioned a possible Planning Commission hearing date of November 30, 2021, and AT&T's tolling agreement proposes a shock clock deadline of 11:59 p.m. on January 7, 2022. Unfortunately, the November 30, 2021, Planning Commission agenda is full and cannot accommodate additional hearings.

If you and AT&T are able to submit the above described information and materials by November 4, 2021, City staff will be able to review the information and materials and schedule this application or a Planning Commission hearing on the December 14, 2021, agenda. Assuming AT&T is able to submit its materials by November 4, 2021 and have the application heard on the December 14, 2021, Planning Commission agenda, the City proposes tolling the shot clock through 11:59 p.m. on February 8, 2022. That date will allow enough time for the City to schedule any Planning Commission appeal requests to be heard by City Council.

Please advise if AT&T is willing to enter into such a tolling agreement through February 8, 2022, or a later date if AT&T believes it will require more time to submit the required information and materials, and let me know if you have any questions about any of the above.

Best,
Eric

From: [Kevin Gallagher](#)
To: [Baptiste, Erica](#); [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Maria Kim](#)
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004
Date: Wednesday, November 10, 2021 10:03:54 AM

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Hi Erica,

Thank for your response.

Unfortunately, we do need an idea, even it's just a ballpark one, of what costs AT&T can expect to incur from Petaluma as part of this project. We've already been charged over \$10,000 in costs for a project that has not yet gone to hearing, which is quite high even relative to much larger wireless projects in the area. If we are going to continue to incur costs through February or March, we need to have some kind of expectation of what the total is going to be, even if it's a rough guess as to the number of hours and the hourly rate.

This is not the first wireless project application Petaluma has processed, nor is it the first one that has been the subject of a focused campaign.

We also do need to know whether AT&T is going to be billed for staff time spent responding to wide ranging complaints about City staff and the municipal code that reference this project, such as the correspondence that was forwarded to us.

Please advise.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

[*KGallagher@completewireless.net*](mailto:KGallagher@completewireless.net)

*2009 V Street
Sacramento, CA 95818*

From: Baptiste, Erica <ebaptiste@cityofpetaluma.org>
Sent: Friday, November 05, 2021 3:40 PM
To: Kevin Gallagher <KGallagher@completewireless.net>; Roberts, Eric <eroberts@cityofpetaluma.org>
Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>
Subject: Re: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin -

Thank you for letting us know about your concerns.

We understand that some of these complaints are regarding the City's Telecommunications Ordinance and not solely on this application. The purpose of forwarding that correspondence was to alert you so your team is aware of the climate in advance of your neighborhood meeting.

It is my understanding the recent invoice is reflective of costs to date and expected costs related to this project, not all telecommunications focused work. Also note, if the deposit is not exhausted, you will be issued a refund.

Please let me know if you have any other questions or concerns.

Best,
Erica

Erica Baptiste

Planning Manager
City of Petaluma | Community
Development
ebaptiste@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Friday, November 5, 2021 3:15 PM

To: Roberts, Eric <eroberts@cityofpetaluma.org>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Hi Eric,

Apologies for any ambiguity below. On 11/2, I was not requesting verification our application materials submitted thus far are adequate for a public outreach meeting. My intent was to explain that AT&T does not wish to hold a public outreach meeting until it has gathered the additional materials the City requested and staff have had a chance to review them and confirm they are satisfied as to the material's completeness. We don't want to find ourselves in a position where we conduct a public outreach meeting and are then obliged to conduct a second one.

We disagree with your contention that the scope of the concerns raised warrant multiple outreach meetings. Of the comments you forwarded to me, Mr. Lee's was a complaint about the City planning process. Ms. Obaid's was a complaint that the City had not revised its wireless ordinance in time for it to apply to AT&T's application. Ms. Purcell's was comment was devoted to arguing FCC standards for wireless emissions should be substantially lower. (As the 3rd party RF study we provided notes, the proposed facility's maximum emissions at ground level comes in at 0.26% of the FCC general public exposure limits.) Finally, Mr. McGavin's comments are another complaint about City staff and a copy of a letter he sent to the principal of St. Vincent De Paul High School. These folks appear to want a townhall with the City on the wireless code, not a discussion of this particular project with AT&T.

Before we proceed further on this, we'd like know what kind of costs we can reasonably expect going forward to hearing. We've already gotten a pretty substantial invoice from the City for a project that has not yet gone to hearing, and my concern is that now that the public has been notified of this project, there's an expectation that AT&T is going to be on the hook for all staff time relating to complaints about the wireless code. Given that our timeline is going all the way out to March, we're concerned that fees are going to spiral out of control relative to the size of the project.

Thanks,

***Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting***

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Thursday, November 04, 2021 7:44 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;

Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin,

Thank you for consideration of the City's proposed timeline and your revised tolling agreement. I

wanted to circle back to your request in your 11/2 email for verification that your materials are satisfactory for the outreach meeting. The City has been sent concerns by the community through email, in-person inquiries, and at City Council. I have attached email comments received as of yesterday, 11/3 for your review. It would be best to address these concerns at the neighborhood meeting, and provided the scope of the concerns, I recommend considering hosting multiple neighborhood outreach meetings. The City recommends holding neighborhood outreach as early as possible to obtain community feedback, however with comments already in hand, I advise using this information to help gauge when to hold the meeting. This way, community feedback may help inform preparation of materials, such as the alternative sites analysis.

On the topic of resubmittal materials, do you have a timeline of when we can expect to have the requested materials submitted?

Please feel free to reach out with any questions,

Best,
Eric

Eric Roberts, AICP

Assistant Planner
City of Petaluma | Community
Development
office. [707-778-4317](tel:707-778-4317) |
eroberts@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Kevin Gallagher <KGallagher@completewireless.net>

Sent: Wednesday, November 03, 2021 2:46 PM

To: Roberts, Eric <eroberts@cityofpetaluma.org>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

---Warning: Use caution before clicking any attachments. THIS EMAIL IS FROM OUTSIDE OUR EMAIL SYSTEM.---

Hi Eric,

I just spoke with Greg. Given the noticing times and the additional information that will need to be provided and reviewed by the City, we both agree that the December 14th hearing date is not going to be feasible. A January date seems more reasonable – that will still give us time for any appeals within the shot clock period.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Kevin Gallagher

Sent: Tuesday, November 02, 2021 3:35 PM

To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;

Rich Busch <rich.busch@wirelesscounsel.com>; Maria Kim (<MKim@completewireless.net>

<MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Eric,

Please find attached an extension letter for signature to extend the deadline out to March 23, 2022 for this project.

We are still in the process of gathering the requested materials in your October 21st email. We'd like to verify our materials are satisfactory prior to holding the outreach meeting.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Monday, November 01, 2021 7:49 AM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>

Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin,

Have you and AT&T had time to consider the tolling agreement proposed through February 8, 2022?

I also wanted to follow up if you need anything to host the neighborhood meeting. If notice can go out this week, the meeting could feasibly take place before the Thanksgiving holiday.

Thanks,
Eric

Eric Roberts, , AICP

Assistant Planner
City of Petaluma | Community
Development
office. 707-778-4317 |
eroberts@cityofpetaluma.org



Petaluma is in a drought. There are many programs and incentives to help you conserve water! Learn more [HERE](#).

From: Roberts, Eric
Sent: Monday, October 25, 2021 12:56 PM
To: Kevin Gallagher <KGallagher@completewireless.net>
Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>
Subject: RE: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Hi Kevin,

In addition to the information below, I am attaching a list of addresses within 1,000 feet of the subject property so that you may begin sending invitations for the required neighborhood outreach meeting. Please let me know if you need anything else at this time.

Best,
Eric

From: Roberts, Eric

Sent: Thursday, October 21, 2021 4:50 PM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>; rich.busch@wirelesscounsel.com; Danly, Eric <EDanly@cityofpetaluma.org>; Brady, Dylan <DBRADY@cityofpetaluma.org>; Hines, Heather <hhines@cityofpetaluma.org>

Subject: 849 Keokuk AT&T - St. Vincent De Paul - PLMA-21-0004

Kevin,

Thank you for your email with the proposed tolling agreement. The City appreciates the offered tolling agreement and is interested in entering into a tolling agreement with AT&T. First, in an effort to ensure that the tolling agreement provides both parties with sufficient time to prepare and process the application, staff would like to make you and AT&T aware of several issues with the application that must be addressed before an approval can be issued.

Based on City staff's review of the application materials, the following information and materials from the City's publicly stated application requirements are still missing, incomplete, or insufficient:

1. **Missing equipment in Site Plans:** The submitted site plans are incomplete pursuant to the requirements in Petaluma Municipal Code ("PMC") § 14.44.130.A and the Telecommunications Facility Application Checklist. The site plans fail to identify the equipment to be installed in the existing indoor equipment rack for this proposed facility. Please provide revised complete plans that clearly identify what equipment will be installed inside the interior room, including manufacturer, model number and dimensions, including the volume for all non-antenna equipment. Without this information, the City cannot verify that the proposed facility is a qualifying "small wireless facility" as defined by the FCC and that the corresponding small wireless facility shot clock applies as alleged by AT&T.
2. **Noncompliant proposed facility design:** The proposed facility design does not appear to comply with several requirements of the PMC including:
 - a. PMC § 14.44.090.J requires the materials for the facility to be "of a color and type that blends with the surroundings to the greatest extent possible"
 - b. PMC § 14.44.170 requires all facilities to be "designed to blend into the surrounding environment to the greatest extent feasible"
 - c. PMC § 14.44.170.G requires components to be painted with a "flat" paint to "minimize their visibility to the greatest extent feasible"
 - d. PMC § 14.44.170.I requires special design where particularly sensitive elements such as "community features" may be impacted by the facility. This proposed facility is located in a Community Facility zone and the property serves the community as a high school, necessitating special design
 - e. PMC § 14.44.190 requires all facilities to "be located as to minimize their visibility";
 - f. PMC § 14.44.190.E requires facilities on a site without existing telecommunication facilities to "blend with the surrounding existing natural and manmade environment in such a manner as to be effectively unnoticeable"

g. PMC § 14.44.280.A requires facilities to be “located, designed and screened to blend with the existing natural or built surroundings as to reduce visual impacts to the extent feasible considering the technological requirements of the proposed telecommunication service and the need to be compatible with neighboring residences and the character of the community”

h. PMC § 14.44.280.B requires the facility to be “designed to blend with any existing supporting structure” and “not substantially alter the character of the structure or local area”

The proposed facility currently consists of bare equipment mounted on the pole extending out of the roof and does not blend into the structure/building on which it is mounted. The current plans also do not indicate whether or how the proposed facility would be painted.

Concealing the roof-mounted antenna and equipment to resemble a typical building feature such as a vent pipe rising out of the rooftop and painting the concealed facility a flat color consistent with the existing building would seem to be an apparently easy way to blend the proposed facility with the surrounding buildings and minimize the proposed facility’s visibility in compliance with the requirements of the PMC. Staff remains open to alternative concealment strategies that AT&T may wish to propose. Note, the site plans and photo simulations must be revised accordingly with any design changes to the proposed facility.

3. **Alternative site analysis:** The submitted application materials do not include the alternative site analysis required by PMC §§ 14.44.130.A and 14.44.210.A and the Telecommunications Facility Application Checklist. AT&T’s Project Support Statement is insufficient to meet this alternative site analysis requirement because it contains only bare conclusions not factually supported. A meaningful comparative analysis and such technical information and other factual justification are necessary to document the reasons why alternative site locations are unacceptable, infeasible, unavailable or not consistent with the standards in the PMC or Implementing Zoning Ordinance. This analysis is required to make the findings in Petaluma Implementing Zoning Ordinance § 24.030.H because PMC § 14.44.210.A requires the decision making body to receive and approve the alternative analysis described above.

4. **Service area maps and network maps:** The submitted application materials do not include the service area maps and network maps required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. The small coverage range of this proposed facility alleged on both the Telecommunications Facility Application Checklist and AT&T’s Project Support Statement are insufficient to show AT&T’s current and predicted service coverage in the area for all active frequencies that this proposed facility would utilize.

5. **Master plan:** The submitted application materials do not include the master plan for all of AT&T’s related facilities within the City limits, plus one-quarter mile from the City’s urban limit line, showing all existing sites or candidate sites under consideration as required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. This requirement is applicable to all proposed wireless facilities regardless of proposed or alleged coverage range.

6. **Recent title report for the property:** The submitted application materials do not include the title report for the property required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist. AT&T's statement that it does not believe there is ambiguity as to the ownership of the property because the location has operated as a Catholic school for a long period of time is insufficient to fulfill this requirement.

7. **Documentation identifying AT&T's legal access to the site:** AT&T's General Application Form is signed by a Mr. Patrick W. Daly as Principal of St. Vincent de Paul High School as the property owner. Without a title report, the City cannot verify the property owner, and in turn, cannot verify if Mr. Daly is the property owner or has the requisite authority to sign this application form on behalf of the property owner.

If Mr. Daly is not the property owner, supporting documentation from the property owner that Mr. Daly has been delegated authority to sign such application forms on the owner's behalf (e.g., a signed letter of authorization or evidence that Mr. Daly's official position within the Church empowers him to bind the property owner) is required.

If Mr. Daly does not have the requisite authority but another individual does, please provide supporting documentation from the property owner about that individual's authority and new application forms signed by such individual.

Application forms signed by the property owner or supporting documentation from the property owner authorizing another representative to sign the application forms will fulfill this requirement identifying AT&T's legal access to the site required by PMC § 14.44.130.A and the Telecommunications Facility Application Checklist.

8. **Neighborhood Outreach and Public Notification:** As we have previously discussed by email, AT&T has not yet conducted the neighborhood outreach and public notification required for projects requiring public hearings pursuant to City Council Resolution No. 2018-107 N.C.S.

9. **Telecommunications Carriers & Providers Registration Form:** Pursuant to PMC § 14.44.030.K and 14.44.040, please provide a copy of AT&T's Telecommunications Carriers & Providers Registration Form, or please submit this form and associated fee if AT&T is not currently registered with the City.

For the above reasons of missing, incomplete, and insufficient application information and materials, noncompliant proposed facility design, and lack of neighborhood outreach and public notification, City staff cannot at this time recommend that the Planning Commission approve this proposed project. The City acknowledges that this request for the missing, incomplete, and insufficient application information and materials may no longer pause or toll the shot clock for this application, but the City reiterates that without such information and materials described in the City's publicly stated application requirements, City staff cannot recommend that the Planning Commission approve this proposed project.

However, City staff would like to continue working with you and AT&T to obtain the required

application materials, revise the proposed facility design to meet the requirements of the PMC, and complete the public notice process.

Your last email states that the shot clock expires today, October 21, 2021. If the 60-day small wireless facilities shot clock is applicable, the shot clock does not expire today. You submitted the initial application on July 22, 2021. The City responded with an incomplete notice on July 27, 2021, within 10 days of your initial submission, tolling the shot clock. You resubmitted the application on August 27, 2021, which reset the shot clock to day zero. Assuming the 60-day shock clock applies, the shot clock expires following October 26, 2021.

Your previous email mentioned a possible Planning Commission hearing date of November 30, 2021, and AT&T's tolling agreement proposes a shock clock deadline of 11:59 p.m. on January 7, 2022. Unfortunately, the November 30, 2021, Planning Commission agenda is full and cannot accommodate additional hearings.

If you and AT&T are able to submit the above described information and materials by November 4, 2021, City staff will be able to review the information and materials and schedule this application or a Planning Commission hearing on the December 14, 2021, agenda. Assuming AT&T is able to submit its materials by November 4, 2021 and have the application heard on the December 14, 2021, Planning Commission agenda, the City proposes tolling the shot clock through 11:59 p.m. on February 8, 2022. That date will allow enough time for the City to schedule any Planning Commission appeal requests to be heard by City Council.

Please advise if AT&T is willing to enter into such a tolling agreement through February 8, 2022, or a later date if AT&T believes it will require more time to submit the required information and materials, and let me know if you have any questions about any of the above.

Best,
Eric

From: [Kevin Gallagher](#)
To: [Roberts, Eric](#)
Cc: [Powell, Greg](#); [Baptiste, Erica](#); [Maria Kim](#); [Danly, Eric](#); [Danly, Eric](#)
Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS
Date: Thursday, October 21, 2021 10:10:49 AM
Attachments: [image005.png](#)
[image006.png](#)

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Hi Eric,

Is there any word on the status of the tolling agreement?

I know our reckonings of the shot clock are a few days different, but by our reckoning the FCC shot clock on this project runs today.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street
Sacramento, CA 95818

From: Kevin Gallagher

Sent: Friday, October 15, 2021 5:18 PM

To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>

Cc: 'Powell, Greg' <GPOWELL@cityofpetaluma.org>; 'Baptiste, Erica' <ebaptiste@cityofpetaluma.org>; Maria Kim <MKim@completewireless.net>; 'edanly@cityofpetaluma.org' <edanly@cityofpetaluma.org>; 'edanly@cityofpetaluma.org' <edanly@cityofpetaluma.org>

Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS

Hi Eric,

Please find attached a tolling agreement for signature. We've addressed it to the City Attorney, who I've added, but if it should go to someone else, please let me know and we can revise.

We've got a proposed date of January 7th just to be conservative in light of the holidays. Assuming we have a hearing date on Nov 30, a last minute appeal would put us in the position of potentially scrambling for a tolling agreement extension right before the holidays, which can be tricky.

Thanks,

Kevin Gallagher, Land Use Planning Specialist

Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Kevin Gallagher

Sent: Friday, October 15, 2021 9:35 AM

To: 'Roberts, Eric' <eroberts@cityofpetaluma.org>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;

Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS

Thanks Eric.

Could you provide the noticing list for properties within 1000' of the project site? We can handle the envelope stuffing if we've got the list of folks that need to be notified.

Thanks,

Kevin Gallagher, Land Use Planning Specialist
Complete Wireless Consulting

(916) 764-2632

(916) 313-3730 fax

KGallagher@completewireless.net

2009 V Street

Sacramento, CA 95818

From: Roberts, Eric <eroberts@cityofpetaluma.org>

Sent: Friday, October 15, 2021 9:29 AM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;

Maria Kim <MKim@completewireless.net>

Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS

Hi Kevin,

We are expecting to send an email with an updated timeline and other information by the end of the week. Thank you for your patience. In the meantime, I wanted to remind you of the Neighborhood Meeting as provided in Resolution 2018-107 N.C.S. To make the meeting easier for you and participants, a Zoom meeting will be appropriate as previously discussed, and the posted sign will not need to be installed prior to the meeting.

In summary, the neighborhood outreach meeting must be noticed to residents within a 1,000 foot radius at least 10 days prior to the outreach meeting using an invitation that you are welcome to design, but that we can provide if needed. The meeting is encouraged to take place as early as

possible, and we welcome any efforts to initiate this process.

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Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS

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- Logo: City of Petaluma
- Installation: Post set a minimum 18” in the ground, set in sand

Regarding required language, we are hoping to get this to you by end of day today or early tomorrow.

Finally, I am aware that you would like to enter a tolling agreement for the project. We are open to this and will await a proposed agreement at your convenience. Please reach out if you have any questions.

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Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS
Date: Friday, October 15, 2021 5:18:07 PM
Attachments: [image005.png](#)
[image006.png](#)
[Petaluma St Vincent Extension Letter 2021.10.15.pdf](#)

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Hi Eric,

Please find attached a tolling agreement for signature. We've addressed it to the City Attorney, who I've added, but if it should go to someone else, please let me know and we can revise.

We've got a proposed date of January 7th just to be conservative in light of the holidays. Assuming we have a hearing date on Nov 30, a last minute appeal would put us in the position of potentially scrambling for a tolling agreement extension right before the holidays, which can be tricky.

Thanks,

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Date: Friday, October 15, 2021 9:35:20 AM
Attachments: [image017.png](#)
[image018.png](#)

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Assistant Planner

City of Petaluma | Community

Development

office. 707-778-4317 |

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Sent: Thursday, October 07, 2021 9:54 AM

To: Kevin Gallagher <KGallagher@completewireless.net>

Cc: Powell, Greg <GPOWELL@cityofpetaluma.org>; Baptiste, Erica <ebaptiste@cityofpetaluma.org>;
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to the hearing date. For this project, **the neighborhood outreach meeting must be noticed to residents within a 1,000 foot radius at least 10 days prior to the outreach meeting.** I am happy to provide additional details on these processes.

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Subject: RE: 849 Keokuk AT&T Telecomm Project - AT&T ref St. Vincent De Paul HS
Date: Friday, October 15, 2021 9:29:15 AM
Attachments: [image009.png](#)
[image010.png](#)
[Resolution 2018-107 N.C.S. 06182018.pdf](#)

Hi Kevin,

We are expecting to send an email with an updated timeline and other information by the end of the week. Thank you for your patience. In the meantime, I wanted to remind you of the Neighborhood Meeting as provided in Resolution 2018-107 N.C.S. To make the meeting easier for you and participants, a Zoom meeting will be appropriate as previously discussed, and the posted sign will not need to be installed prior to the meeting.

In summary, the neighborhood outreach meeting must be noticed to residents within a 1,000 foot radius at least 10 days prior to the outreach meeting using an invitation that you are welcome to design, but that we can provide if needed. The meeting is encouraged to take place as early as possible, and we welcome any efforts to initiate this process.

Best,
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Attachments: [image001.png](#)
[image002.png](#)

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