

City of Sonoma

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September 11, 2018

Verizon Wireless c/o The CBR Group
Attn: Christy Beltran
841 Arnold Drive, Suite A
Martinez, CA 95443
BY EMAIL TO christy@theCBRgroup.com

Subject: City of Sonoma Verizon Wireless Commercial Small Cell Sites

Dear Ms. Beltran:

In a letter dated August 9, 2018, I, on behalf of the Planning Department, outlined desired design revisions to the proposed commercial Verizon Wireless small cell sites respectively filed under use permit application numbers S-006, S-007, and S-012. These design revisions included an analysis of underground vaulting opportunities, reduction of the proposed antenna size, and minimizing the appearance of each of the sites respective cabling and cable connections. Staff understands that Verizon is currently working to address these comments. You responded that more information, including a vaulting analysis, would be provided by September 14, 2018. I look forward to receiving the additional information.

Having now had the opportunity to review in more detail the proposed designs and confer with CTC, the City's wireless technical consultant, the Planning Department would like to notify Verizon of some of the questions and concerns that it has and offer this additional opportunity to Verizon Wireless to explore and possibly incorporate further design revisions beyond what is being prepared by Verizon at this time consistent with the concerns that I have outlined below.

In general, and as to all aspects of the designs being proposed, the Planning Department requests that Verizon address the various considerations (including aesthetics, character, and suitability to the local conditions as demonstrated further below) that will need to be given by the Planning Commission in determining whether the elements of the designs being proposed satisfy the standards, values, and objectives set forth within the Municipal Code for telecommunications facilities. There are a number of these standards set out throughout the Sonoma Municipal Code (SMC) that are applicable to the pending commercial applications.

Section 5.32.110(C) of Chapter 5.32 (Telecommunications Facility and Antenna Criteria) of the Municipal Code provides that all telecommunications facilities shall be located so as to minimize their visibility and the number of distinct facilities present. Such provision obligates Verizon to

consider any measures which may be taken to minimize the visibility and number of facilities that are being designed before the matter is heard by the Planning Commission. Staff is charged with evaluating and analyzing Verizon's design and reporting to the Planning Commission on those measures that were considered and why they were or were not incorporated into the design. In order for the Planning Department to be able to perform this analysis, Verizon will need to address any potential measures or alternatives to the visual aspects of its designs.

As another example of the findings to be made under the Municipal Code, SMC Section 19.54.040 requires that the "location, size, design, and operating characteristics" be compatible with existing and future land uses in order for a conditional use permit to be issued. This obligates Verizon to analyze whether each of the proposed facilities is compatible with property uses that now exist and are expected to exist in the future in each of the separate locations where the facilities are being proposed. Naturally, aesthetic and operational considerations would be necessary for any such determination. Again, it will be the Planning Department's responsibility to analyze for the Planning Commission whether this standard has been attained through the proposed designs.

Verizon is also obligated to ensure that its design will not "impair the architectural integrity and character of the zoning district" in which the facilities would be placed. SMC Section 19.54.040(E)(4). It is incumbent upon Verizon to give due consideration to this question and incumbent upon the Planning Department to render an analysis of this question. While it is not the City's intention to attempt to design the three proposed sites, please bear in mind that the design concerns and suggested design modifications in this letter will likely be known to the Planning Commission (and potentially the City Council if the matter is appealed) and members of the public when Verizon's applications are being considered. The concerns and suggestions set forth by this letter could also potentially be incorporated into the Planning Department's recommendation to the Planning Commission when the Planning Commission makes its determination on the commercial site applications. Therefore, it is also in the interest of Verizon to take the following comments into consideration in presenting its applications to the City.

Suggested Design Modifications

Three frequency bands are proposed at each commercial site – the 700 MHz band, the Personal Communication band (PCS), and the Advanced Wireless band (AWS). Based on the signal coverage maps of the existing macro Verizon wireless telecommunications sites provided by Verizon to CTC (see attached Verizon 700 MHz cover maps), it appears that the target coverage area of the three proposed sites already has adequate 700 MHz coverage at signal levels of -80 dBm or greater. Using Verizon target signal levels as a deployment criteria there does not appear to be a requirement for additional 700 MHz deployment at these specific sites.

The elimination of the 700 MHz band at the sites would reduce the number of remote radios and result in less visually intrusive small cell sites by only necessitating the deployment of a suitable two-band (AWS/PCS) antenna. Staff understands that antennas and associated antenna concealment equipment utilized for deployment for the PCS and AWS bands are commonly available from manufacturers that have dimensions in the range of a maximum of 24 inches in height (approximately half the height of those included in your designs) and 8 to 10 inches in diameter based on our review of various antenna manufacturer specifications sheets. Please

provide a redesign that uses a suitable antenna focusing on a 2 band (AWS/PCS) deployment. If you do not concur, please provide documentation in support of your response.

Additionally, coverings or closures on radio units would appear not only appropriate but “minimize the visibility” of some of the proposed facilities in accordance with SMC Section 5.32.110(C). Please indicate whether you would agree to add coverings or enclosures on radio units to your designs. If not, please provide documentation in support of your response.

Furthermore, the reduction to only the PCS and AWS bands would also reduce the number of radio units needed at each site to two units, which would also contribute to the reduction in visibility of the sites. In addition to the analysis that you are currently engaged in regarding “undergrounding” of support equipment (including radios) pursuant to SMC Section 5.32.110(B)(4), please also explore other relocation options that would locate the proposed radio units as close as possible to the proposed antenna location on each site so as to limit the amount and visibility of the cabling proposed on each site. Please indicate whether you would agree to limiting the number of radio units at each site to two instead of three. Please re-locate the proposed radio units as close as possible to the radio units in the event that they remain on the poles. If that is not possible, please provide documentation supporting your view.

In the instance that the foregoing design recommendations cannot be accomplished, please provide documentation to that effect. Please provide your responses and all documentation requested to be furnished by this letter within thirty (30) days of the date of this letter. As stated at the outset I look forward to receiving the additional information that you will be submitting by September 14th. I am furnishing you this correspondence prior to receipt of that information so that you will have sufficient time to meet the timeframe set forth above, in the event that the additional material does not address the comments and concerns in this letter.

Sincerely,



Aaron Hollister
Contract Planner

Enclosure: City of Sonoma 700 MHz Verizon Coverage Maps

cc:

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