



# CITY OF CARMEL-BY-THE-SEA PLANNING COMMISSION AGENDA

Planning Commissioners Mel Ahlborn, Erin Allen, Stefan Karapetkov, Michael LePage, Stephanie Locke

All meetings are held in the City Council Chambers  
East Side of Monte Verde Street  
between Ocean and 7th Avenues

**Special Meeting**  
**Tuesday, February 10, 2026**  
**4:00 PM**

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## HYBRID MEETING ATTENDANCE OPTIONS

This meeting will be held in person and via teleconference ("hybrid"). The public is welcome to attend the meeting in person or remotely via Zoom, however, the meeting will proceed as normal even if there are technical difficulties accessing Zoom. The City will do its best to resolve any technical issues as quickly as possible. To view or listen to the meeting from home, you may also watch the live stream on the City's YouTube page at: <https://www.youtube.com/@CityofCarmelbytheSea/streams>. To participate in the meeting via Zoom, copy and paste the link below into your browser.

<https://ci-carmel-ca-us.zoom.us/j/82164127685?pwd=rOAdDzv9TIArrx3T23strz3roOriDA.1> To attend Zoom webinar via telephone, dial +1 (669) 444-9171, Webinar ID: 821 6412 7685, Passcode: 001916

## HOW TO OFFER PUBLIC COMMENT

The public may give public comment at this meeting in person, or using the Zoom teleconference module, provided that there is access to Zoom during the meeting. Zoom comments will be taken after the in-person comments. The public can also email comments to [sgorman@ci.carmel.ca.us](mailto:sgorman@ci.carmel.ca.us). Comments must be received at least 2 hours before the meeting in order to be provided to the legislative body. Comments received after that time and up to the beginning of the meeting will be made part of the record.

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## CALL TO ORDER AND ROLL CALL

## PUBLIC APPEARANCES

Members of the public are entitled to speak on matters of municipal concern not on the agenda during Public Appearances. Each person's comments shall be limited to 3 minutes, or as otherwise established by the Chair. Persons are not required to provide their names, however, it is helpful for speakers to state their names so they may be identified in the minutes of the meeting. Under the Brown Act, public comment for matters on the agenda must relate to that agenda item and public comments for matters not on the agenda must relate to the subject matter jurisdiction of this legislative body. If a member of the public attending the meeting remotely violates the Brown Act by failing to comply with these requirements of the Brown Act, then that speaker will be muted.

## ANNOUNCEMENTS

## **PUBLIC HEARINGS**

- 1) **DR 25313 & UP 25314 (Verizon Sequoia Deployment):** Continued from the January 21, 2026 and February 4, 2026 Planning Commission hearings, consideration of a Use Permit, Design Review, and Coastal Development permit for the construction of a Small Wireless Facility on a replacement PG&E pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District.

**Proposed CEQA Action:** Find the project categorically exempt pursuant to CEQA Guidelines section 15302 (Replacement or Reconstruction) and that none of the exceptions to the exemptions contained in section 15300.2 can be made in this case; OR, find the project statutorily exempt pursuant to CEQA Guidelines section 15270 (Projects Which Are Disapproved)

## **FUTURE AGENDA ITEMS**

- 2) Next Regular Meeting: February 11, 2025
- 3) Next Special Meeting: February 18, 2026

## **ADJOURNMENT**

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This agenda was posted at City Hall, Monte Verde Street between Ocean Avenue and 7th Avenue, Harrison Memorial Library, located on the NE corner of Ocean Avenue and Lincoln Street, the Carmel-by-the-Sea Post Office, 5th Avenue between Dolores Street and San Carlos Street, and the City's webpage (<http://www.ci.carmel.ca.us>) in accordance with applicable legal requirements.

## **SUPPLEMENTAL MATERIAL RECEIVED AFTER THE POSTING OF THE AGENDA**

Any supplemental writings or documents distributed to a majority of the Planning Commission regarding any item on this agenda, received after the posting of the agenda will be available at City Hall located on Monte Verde Street between Ocean and Seventh Avenues during regular business hours.

## **SPECIAL NOTICES TO PUBLIC**

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office at 831-620-2000 at least 48 hours prior to the meeting to ensure that reasonable arrangements can be made to provide accessibility to the meeting (28CFR 35.102-35.104 ADA Title II).



**CITY OF CARMEL-BY-THE-SEA**  
**Planning Commission**  
**Staff Report**

**February 10, 2026**  
**PUBLIC HEARINGS**

**TO:** Chair LePage and Planning Commissioners  
**SUBMITTED BY:** Jacob Olander, Assistant Planner

**APPROVED BY:** Anna Ginette, AICP, Director of Community Planning and Building

**SUBJECT:** **DR 25313 & UP 25314 (Verizon Sequoia Deployment):**  
Consideration of a Use Permit, Design Review, and Coastal Development permit for the construction of a Small Wireless Facility on a replacement PG&E pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District.

**Proposed CEQA Action:** Find the project categorically exempt pursuant to CEQA Guidelines section 15302 (Replacement or Reconstruction) and that none of the exceptions to the exemptions contained in section 15300.2 can be made in this case; OR, find the project statutorily exempt pursuant to CEQA Guidelines section 15270 (Projects Which Are Disapproved)

**Application:** DR 25313 & UP 25314 (Verizon Sequoia Deployment)      **APN:** N/A

**Block & Lot:** N/A

**Location:** Public Right-of-Way in front of Carmelo 4 SE of 10th Avenue

**Applicant:** Sequoia Deployment Services, Inc.      **Owner:** PG&E

**Recommendation:**

Staff recommends the Planning Commission adopt a resolution (Attachment 1):

1. Finding the project *Statutorily Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15270(a) of the CEQA Guidelines (Projects Which Are Disapproved)* which states that CEQA does not apply to projects which a public agency rejects or disapproves; and
2. Denying a Use Permit, Design Review, and Coastal Development permit for the construction of a Small Wireless Facility on a replacement PG&E utility pole in

the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District.

### **Summary, Background, and Project Description:**

The DR 25313 & UP 25314 (Verizon Sequoia Deployment) applications were submitted October 15, 2025, for the construction of a Small Wireless Facility on a replacement PG&E utility pole in the public right-of-way in front of Carmelo Street 4 southeast of 10<sup>th</sup> Avenue. [Carmel Municipal Code \(CMC\) Section 17.46.050.A.1.a](#) requires a “Type III” Conditional Use Permit application for proposed Small Wireless Facilities on replacement poles, which includes Design Review and a Coastal Development permit, if applicable. Carmel-by-the-Sea City Council adopted the current wireless ordinance in 2023 to address changes in state and federal law and it was certified by the Coastal Commission in June 2025. This is the first Type III application that the city has received since the ordinance went into effect.

The application materials were posted on the city website on October 15, 2025. City staff posted the notice of filing for the wireless facility application on site and hand delivered notices January 6<sup>th</sup>, 2026, inadvertently exceeding the requirement contained in Carmel Municipal Code (CMC) Section 17.46.070.A.1 to do the noticing within 5 days of application filing. However, the initial website posting and outreach, meeting and corresponding with residents and providing information about the application received achieved the intent of this CMC section.

Subsequent to posting of the DR 25313 & UP 25314 (Verizon Sequoia Deployment) application materials on the city website and other outreach, the city has received correspondence from concerned residents living in proximity to the new proposed Small Wireless Facility. City staff, the Community Planning and Building Director, and Assistant City Administrator met with two concerned residents on October 22, 2025, to discuss the application. The residents provided a list of questions for city staff and raised concerns regarding the placement of the wireless facility in a residentially zoned district. Staff responded to the questions regarding the proposed Small Wireless Facility. Additionally, staff provided all copies of completeness review and completeness review response to the concerned residents.

Additionally, written comments have been received from members of the public. These are included in Attachment 11. As of the time of writing this report, staff has received seventeen letters from residents expressing their desire for the city to deny the application. The reasons for denial cited are that the project does not meet the Carmel Municipal Code, the facility is not aesthetically pleasing nor aligned with Carmel-by-the-Sea’s character, lack of demonstration of a significant coverage gap, and loss to property values. Additionally, residents raised concerns about the proliferation of similar facilities if this site is approved. The residents stated that the project does not meet the Carmel Municipal Code because the Small Wireless Facility is proposed for the residential zone, in the public right-of-way, and in the centerline of a window of an adjacent home.

On January 15, 2026, city staff and the Director of Community Planning and Building met with two concerned residents to discuss the proposed Small Wireless Facility. At the meeting, the residents expressed their desire for the wireless facility to be denied by the city due to the placement in the Single-Family Residential (R-1) zoning district.

The residents also raised concerns about the technology being proposed. They pointed out that broadband or data services do not have the same protection as telecommunication services. They asked if the city would be able to require wireless companies to propose facilities that would only be used for telecommunications services and not broadband/data services as well. City staff confirmed with the residents that the application is for wireless telecommunication services facilities.

Subsequently, City staff confirmed with the city's special counsel that 47 USC Section 332(c)(7) applies to personal wireless facilities used to provide commingled wireless services (both telephone and broadband/data). As recently as 2018, the Federal Communications Commission (FCC), in its Restoring Internet Freedom order, reaffirmed that Section 332(c)(7) applies to facilities that are used for commingled services. Section 332(c)(7) establishes certain procedural and substantive limits on local wireless facility siting authority. For example, no local government may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the FCC's regulations concerning such emissions.

Additionally, this federal law does not allow local regulation of personal wireless service facilities to prohibit or have the effect of prohibiting the provision of personal wireless services. The City's special counsel confirmed that the city cannot require wireless providers to only use their facilities to provide telecommunications services and not commingled services.

Per Federal Communications Commission (FCC) regulations, Small Wireless Facilities on new structures are subject to a 90 day "shot clock" (47 CFR 1.6003(c)(1)(ii)). A "shot clock" is defined in CMC Section 17.46.020.A.19, "the time defined by the FCC in 47 CFR [1.6003](#) or [1.6100\(c\)](#) (as applicable) in which a State or local government must act on an application or request for authorization to place, construct or modify personal wireless services facilities." Per FCC regulations, the shot clock for a Small Wireless Facility application starts upon submittal of the application but stops if the city provides a notice of incompleteness within 10 days of application submittal and is reset upon the first resubmittal. After this first reset, the shot clock runs and can only be paused (not reset) if further notices of incompleteness are provided within 10 days of each resubmittal identifying items from the first completeness review that were not sufficiently addressed by the applicant's prior resubmission. Final action by the jurisdiction is required by the date the shot clock expires unless there is a tolling agreement in place. A tolling agreement is an agreement between a jurisdiction and a wireless carrier to extend the shot clock deadline. Under Cal. Gov. Code Section 65964.1, if an application is not approved or disapproved within the applicable FCC shot clock period including any extension agreed under a tolling agreement, the application may be deemed approved in certain circumstances.

City staff provided a completeness review letter to the applicant on October 24, 2025, pausing the shot clock for the application. The shot clock was reset and started on November 26, 2025, with the applicant's submittal of the revised and missing application materials. A second completeness review letter was sent to the applicant on December 5, 2025. The applicant provided their response for the second completeness review on December 11, 2025. The applicant and the city disagree as to whether the second completeness review notice paused the shot clock. According to the city, the shot clock was paused, and the new end of the shot clock will be March 5th, 2026. According to the applicant, the shot clock was not paused, and the end of the shot clock will be February 24th, 2026.

The FCC rules require that all permits and authorizations be acted upon within the applicable shot clock period. The City's application form requires the applicant to submit all required applications at the same time or waive the claim that the City was required to act on those permits during the same shot clock period. Here, the applicant also submitted applications for a building permit, a traffic control permit and a permanent encroachment permit. Those applications will be reviewed separately and will only be completed if DR 25313 and UP 25314 are approved. The building permit will be reviewed through the building division and the assigned planner to make sure that all conditions of approval are incorporated and that the project matches what was approved. The Traffic Control will be part of the Permanent Encroachment permit. They will be reviewed by Public Works, Building, and Planning. Additionally, PG&E will also need to obtain permits for the installation of the replacement pole and install same. Special condition #2 has been incorporated to address these requirements.

At the January 21, 2026, Planning Commission meeting, the Planning Commission heard testimony from staff, the applicant and the public, and continued the hearing on the project to a date certain of February 4, 2026. The hearing was continued due to the volume of correspondence received from residents and their attorneys the day before the Planning Commission meeting. The residents provided written correspondence stating a myriad of reasons that they opposed the wireless facility; aesthetics, health, property values, safety, CEQA, future Eligible Facility Requests, code violations, and effects to the adjacent historic property.

At the February 4, 2026, Planning Commission meeting, the project was continued to a date certain of February 10, 2026. Staff received documents from Sequoia Deployment Services on Friday January 30, 2026, the day the staff report was scheduled to be published. Additional correspondence from the resident's attorney was also received on February 3, 2026, the day before the Commission meeting. As recommended by staff, the Commission continued the hearing on the project to allow staff, the city engineering consultant (CTC), and the City's special counsel to complete the analysis of materials received from the Sequoia Deployment Services and the concerned residents.

**Staff Analysis:**

The discussion below summarizes the comments received and provides staff's response for the Commission to consider. Through submittal of additional information

and analysis of that information, there is an argument that the Golden Bough Theatre is a potential viable location for a wireless facility. Due to this potential, and the lack of supporting data from the applicant clearly demonstrating that the Golden Bough site is not viable, it is staff's recommendation that the Planning Commission deny the application (see draft Resolution in Attachment 1).

However, if the Planning Commission finds that the Golden Bough site is not viable, the staff recommends the Planning Commission take the following action:

Adopt a Resolution (Attachment 2):

1. Finding the project categorically exempt from the California Environmental Quality Act (CEQA), State CEQA guidelines and local environmental regulations, pursuant to CEQA Guidelines Section 15301, 15302, 15303, and 15304 and no exceptions to the exemptions listed in Section 15300.2 can be made; and
2. Approving a Use Permit, Design Review, and Coastal Development permit for the construction of a Small Wireless Facility on a replacement PG&E utility pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District.

*Analysis of Resident and Resident Attorney Concerns (Submitted Just Prior to the January 21, 2026 Meeting):*

The following items were sent to the city staff by concerned residents and their attorneys within 24 hours of the January 21, 2026 Planning Commission hearing.

Tree Protection

The resident's attorney, Ariel Strauss, argues that the tree adjacent to the proposed replacement pole is a significant tree that will be damaged should the proposed small wireless facility be approved. Strauss further states, though the regulations forbidding a new structure in a tree dripline don't include the "parenthetical "new (nonreplacement)", such as in Section 17.46.040, subsections D(1) and E(1),(2).", he argues that Special Condition of Approval #3, requiring the applicant to provide a landscape management plan prior to building permit issuance, is inadequate to protect the tree, contending that post entitlement requirements would be unenforceable due to the limited shot clock for the facility.

**Staff Analysis:** Staff dissents with Strauss's interpretation of the Carmel Municipal Code (CMC) Section 17.46.040.F.1.f, Trees and Landscaping. The city's wireless ordinance differentiates new, existing, and replacement poles frequently with and without parentheticals. In this case, the strict application of the language contained in the aforementioned code section is important. The first sentence states: "Wireless facilities shall not be installed (in whole or in part) on new poles within any tree drip line." The existing pole to be replaced is within the dripline of an oak tree. The project does not include the installation of a utility pole within an area where one does not exist. The subsequent sentences state: "Wireless facilities may not displace any

existing tree or landscape and/or hardscape features. All wireless facilities proposed to be placed in a landscaped area must include landscape and/or hardscape features (which may include, without limitation, trees, shrubs and ground cover) and a landscape maintenance plan. The existing native vegetation shall be maintained to the maximum extent feasible.” Strauss’s assertion that Special Condition of Approval #3 is inadequate to protect the tree is misleading as the intent of the condition is to address and achieve consistency with the specified regulation. There are two additional conditions of approval that speak to tree protection. General Condition of Approval # 5 states that the permittee must construct the facility in strict compliance with the approved plans. The project plans do not include the removal of the oak tree nor do the requested permits request removal. General Condition of Approval #10 states that any landscape features (including trees) damaged or displaced due to construction shall be replaced. This condition specifies that “Any replacement tree must be substantially the same size as the damaged tree or as otherwise approved by the City.” In addition, Staff met the PG&E project manager, arborist, and the applicant at the proposed PG&E replacement pole site on February 4, 2026. The arborist confirmed that the tree trimming associated with the pole replacement and construction of the wireless facility was less than the standard tree trimming done to trees around PG&E utility poles. Out of an abundance of caution, staff recommends retaining General Condition of Approval #'s 5 and 10, and Special Condition of Approval #3 to ensure there is a documented plan for the treatment of the surrounding landscaping and tree.

#### Non-stealth Site

Strauss raised concerns regarding future Eligible Facility Requests (EFR) for modifications to the proposed small wireless facility. The attorney argues that the proposed Small Wireless Facility is a non-stealth site and therefore the city would have limited ability to regulate any future EFR’s for the site.

**Staff analysis:** Staff contends that the proposed small wireless facility is a stealth facility. Carmel Municipal Code (CMC) Section 17.46.020.A.20 provides guidance on how to evaluate if a facility is stealth. The CMC defines “stealth” to mean “concealment elements, measures and techniques that mimic or blend with the underlying structure, surrounding environment and adjacent uses to screen all transmission equipment from public view and integrate the wireless facility into the built or natural environment such that, given the particular context, a reasonable person would not recognize the structure as a wireless facility.” It further describes stealth concealment techniques as, “(a) transmission equipment placed completely within existing or replacement architectural features such that the installation causes no visible change in the underlying structure; (b) new architectural features that mimic or blend with the underlying or surrounding structures in style, proportion and construction quality such that they appear part of the original structure's design; and (c) concealment elements, measures and techniques that mimic or blend with the underlying structure, surrounding environment or adjacent uses.” Here the existing facility is a utility pole. The issue is whether a reasonable person would not recognize it as a wireless facility once the concealment techniques for the wireless antenna and equipment are deployed. The antenna shroud and equipment shroud are both being used to

conceal/stealth the site. All visible portions of the wireless facilities (shroud and conduits) are required to be painted to match the existing utility pole. As a replacement utility pole, the facility would be a base station for EFR purposes. As a stealth facility, one of the criteria that would have to be considered in a future EFR is whether the proposed modification would defeat the concealment. However, Whether there will be any future EFRs is speculative at this point and not up for consideration as part of this project review.

#### Interference with adjacent historic property

The resident's attorney states that proposed small wireless facility may trigger review of consistency with the Secretary of the Interior's Standards for Historic Preservations and therefore violated CMC Section 17.46.040.E.1.b. Strauss further references the California State Historic Preservations Officer's Section 106 Consultation Guidelines for FCC Designees and Applicants Regarding Cell Tower and other Wireless Communication Facilities.

**Staff analysis:** The State Historic Preservation (PA) document states, "the addition of a small antenna to an existing tower or other structure that is not an historic property should ordinarily have no effect on historic properties, the PA exempts most collocations on existing structures from further Section 106 review."

Strauss further states that the Secretary of the Interior Standards for Historic Preservation include no discuss on wireless facility or utility poles. Strauss references the section of a Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings regarding bollards, fencing, and stanchions in a neighborhood adjacent to historic properties. Mr. Strauss quotes the "NOT RECOMMENDED" section that says these features shall not be placed without taking into consideration their location and visibility so that they negatively impact the historic character of the setting. This section of the guidelines is not applicable to small wireless facilities and, if it was, the proposed wireless facility would not have a negative impact on the historic character. PG&E utility poles with associated equipment are not uncommon in the neighborhood and do not adversely impact the property.

#### CEQA Exemption

Mr. Strauss's letter states that the project is not exempt from CEQA due to the potential impact to the adjacent historic property. He references the section of his letter regarding the effect of the facility on a historic resource. Further, he reiterates concerns regarding EFRs and their cumulative impacts on the adjacent historic property. Strauss continues to refer to the site as a non-stealth facility.

**Staff analysis:** As discussed previously in the report, staff finds that the site will not have a negative impact on the adjacent historic property. It is staff's contention that the site is a stealth facility due to the shrouding associated with the facility.

Additionally, the CMC does not allow for prohibiting a site due to speculative and hypothetical future expansion of a site.

Strauss argues that the historic resources exception in CEQA Guidelines section 15300.2(f) applies to negate the application of any such categorical exemptions because the project, by “[i]ninstalling a hulking, ugly pole attachment directly in front of the windows and doors [of the adjacent historic home at Carmelo St. 3<sup>rd</sup> NE of 11<sup>th</sup> Ave.] negatively impacts the historic character of the setting and the ability of the public to enjoy this resource.” In reviewing the DPR form describing why the house was listed as historic it seems to me that the very minimal change in the outward views from within the house and inward views of the house from the street that will result from the project do not seem like there will be any material alteration to the physical characteristics of the historic home which justified its inclusion in the local register of historic resources (i.e., work of well known Carmel contractor/builder and the unique styles, materials and orientation of the house.

#### NEPA Review

Mr. Strauss states that the proposed small wireless facility does not meet the requirements in CMC 17.46.040.F.1.j because the site “may require a NEPA environmental assessment (“EA”) as a wireless facility that may affect districts, sites, buildings, structures or object, significant in American history, architecture.” Strauss references the NEPA document provided by Verizon as part of the original application submittal that contends that Verizon is excluded from review because it qualifies under 47 C.F.R. § 1.1306 as a utility pole expansion. He asserts that Verizon is not excluded from NEPA review and that Verizon’s assertion that compliance will be confirmed prior to installation of the site.

**Staff analysis:** Staff maintains the position that the proposed small wireless facility will not have any impact on the adjacent historic property. The FCC does not require the City to take lead of the NEPA compliance obligation. If approved, the proposed Small Wireless Facility will be subject to a condition of approval that it be in compliance with all Federal and State requirements. (Condition of Approval #11).

#### Robert Beagle Analysis

Strauss provided a letter from Digital Forensics Consultant Robert Beagle. In the letter Beagle explains the equipment being proposed by Verizon, an analysis of the PierCon report and Supplemental Report, an analysis of Verizon’s coverage in the area designated a coverage gap, and raises concerns regarding PierCon and CTC’s review of the Golden Bough as an alternative site. Mr. Beagle raises concerns about the cause of the drop calls, stating that there is not necessarily a shown causal relationship between Mbps and dropped calls. Mr. Beagle also suggests that the Golden Bough could be viable site if Verizon installed different technology in a different configuration. He references the previous application where CTC asserted that the Golden Bough theater would be a viable alternative.

**Staff analysis: CTC** confirmed that the data and engineering performed by PierCon were correct. CTC confirmed the coverage gap shown in the PierCon report is present. CTC further confirmed that the Golden Bough was not a viable alternative site for a

small wireless facility to address the coverage gap as proposed. Further analysis of the Golden Bough Theater with an alternative macro site design is discussed later in the staff report.

#### Annotation of Elevation Drawings

Strauss provided an additional letter with annotations of an elevation drawings in the project plans provided by Sequoia Deployment Services on behalf of Verizon. He states that the project violates CMC Section 17.46 and Design Guidelines by increasing the height by more than is allowed, because the replacement PG&E pole does not resemble the existing poles, the antenna shroud does not taper to the pole, the pole mounted equipment exceeds the preferred 6 cubic feet, the pole mounted equipment volume does not include the attachment brackets and the standoff space covered by cabinet flaps, fiber trenching isn't depicted, and having the meter at 7' instead of 8.5'.

**Staff analysis:** While some of Strauss's are correct concerns, some are not applicable in this case. The shroud wings/flaps covering the standoff space can be removed if the Planning Commission would prefer to have the stand off space open. The applicant needs to provide the cubic footage of the pole mounted equipment bracket. PG&E requires the meter disconnect be between 7' and 8' off the ground, disallowing the applicant from meeting the city's 8.5' above the ground requirement. Fiber is not currently proposed as part of this application. The antenna shroud can either taper to meet the pole and not cover the antenna bracket or cover the antenna bracket. Planning Commission has the authority to decide whether an exposed bracketing or a covered antenna bracket is preferred. Regarding the replacement pole being designed to resemble existing poles, Strauss states that there is extra spacing between power and communications lines. The applicant proposed to keep the communications and power lines attached at the exact elevations that they were at on the existing utility pole, which is the practice for PG&E poles. Special Conditions of Approval can be added to the Resolution by the Planning Commission to require the removal of the shroud flaps, to raise the meter height, and to have the antenna shroud taper to expose the antenna bracket if deemed more acceptable than the current design.

#### Underground equipment

Strauss provided an additional letter stating Verizon has not proven that underground equipment is not feasible.

**Staff analysis:** To install underground equipment at this location, Verizon would have to create more disruptions in the public right-of-way. The equipment would need to be protected and accessible. This would require protective bollards and the removal of a parking space from the public right-of-way. In this location, underground equipment would be more intrusive than the pole mounted equipment proposed.

#### Visual Impact

Strauss states that the proposed facility will have negative view impacts on the surrounding properties. He states that because Verizon argues that other sites are more intrusive due to visual impacts, all sites in the R-1 impose unacceptable impacts.

Additionally, Strauss provided pictures from residences that have a view of the existing utility pole.

**Staff analysis:** There are no negative view or visual impacts from the proposed site. The pictures provided by Strauss do not show any views of hills, homes, ocean, or landmarks obscured or impacted. The baseline condition of these properties is of a view of the existing utility pole. The additional pole height and mounted equipment would not have any consequential view impacts. The fact that Verizon cites visual impacts at other sites does not create a blanket basis for all sites in the R-1 to be unacceptable for visual impacts.

#### Volume

Strauss states again that volume does not pass because of the standoff space being covered by shroud wings and the equipment brackets. He states estimates the space covered by shroud wings/flaps is 5 cubic feet and that the bracket will likely exceed .52 cubic feet should the wings be removed.

**Staff analysis:** The Planning Commission can determine if the standoff space covered by shroud should be covered and if that space counts as accessory equipment. The Planning Commission can similarly determine if the accessory equipment bracket should be counted as accessory equipment.

#### Golden Bough Theater

Strauss provided another letter and asserts that the Golden Bough is the least intrusive means for the placement of a wireless facility.

**Staff analysis:** CTC reviewed the information provided by PierCon in their original report and their first supplemental report, confirming that the Golden Bough would not be a viable small cell site to address the coverage gap as proposed. Further analysis of the Golden Bough Theater with an alternative macro site design is discussed later in the staff report.

#### Verizon Coverage and Service

Strauss provided a technical analysis of the proposed small wireless facility and the Golden Bough theater location. He states the drop call data does not show a coverage gap, the Verizon FCC reports show coverage in the area, Verizon is not proposing low band technology, the coverage gap will need multiple sites to fix, the PierCon report doesn't review low band technology, Verizon is trying to provide broadband service, that the PierCon report uses the wrong height, PierCon did not adjust the rest of the sites in the network to optimize and fill coverage gaps, and that the PierCon report shows the Golden Bough is viable alternative.

**Staff analysis:** CTC confirmed that there was a coverage gap shown by the PierCon report and the provided data. CTC also confirmed that the Golden Bough is not a viable small cell location as proposed. Further analysis of the Golden Bough Theater with an alternative macro site design is discussed later in the staff report.

*Resident and Resident Attorney Concerns (After the January 21, 2026 Meeting):*

The following items were sent to the city staff by concerned residents and their attorneys after the January 21, 2026 Planning Commission meeting.

Eligible Facilities Request

Strauss provided an additional letter after the January 21, 2026, meeting outlining the impacts of future expansions of the proposed small wireless facility. The letter outlines Verizon's ability to expand the site through Eligible Facility Requests that allow for carriers to expand site a certain amount by right. The letter states future expansion would hurt property values and would have negative effects on the adjacent historic property.

**Staff analysis:** Staff provided an analysis on Eligible Facility Requests previously in this staff report. No further analysis is needed

Further Elevation Annotations

Strauss provided additional annotations on the project plan elevations. He added that the overall height is increasing more than is allowed, the RF signage needs to be lower, the applicant needs to provide PG&E authorization, and that the accessory equipment is too low while being exposed to traffic.

**Staff analysis:** Strass is correct that the PG&E Greenbook requires the RF sign to be no higher than 15 from the ground. If the application is approved, the applicant will need to revise project plans to reflect the lower RF signage prior to building permit issuance. CPUC GO95 and PG&E Greenbook requirements will be reviewed at the building and encroachment permit phase of the project. The zoning code only specifies the required content on the RF sign, which the proposed site meets. The overall height increase cannot be addressed as Mr. Strauss suggested because as Sequoia Deployment Services stated the power and communications lines cannot be lowered, creating slack in the lines. The power and communications lines are attached at the exact elevations they are on the existing utility pole. The provided documentation is acceptable as PG&E authorization for this facility as the utility would not authorize power if it was not authorizing the installation. The accessory equipment is in the 9-12 quadrant as is recommended in the Greenbook and is not exposed to traffic.

*PierCon Supplemental Report 2 and Sequoia Deployment Services Letter (After the January 21, 2026 Meeting):*

The following items were sent to the city staff by Sequoia Deployment Services after the January 21, 2026 Planning Commission meeting in response to comments received by the public and the Planning Commission.

Sequoia Deployment Services Letter January 30, 2026

Sequoia Deployment Services provided the city with a letter January 30, 2026, responding to comments received from the residents, the resident's attorney, and the Planning Commission. The letter is divided into six sections and includes a report from

Joint Venture Silicon Valley from 2021 as an exhibit. The six sections are compliance with code requirements, coverage gap, design, location, property values, and environmental review.

**Compliance with the Code Requirements:** The applicant states that they carefully reviewed the code as it was being created and adopted, tailoring their application to meet the voluminous requirements. The applicant incorporated comments from two completeness reviews from staff prior to their application being deemed complete.

Sequoia Deployment Services requested two special exceptions for their proposed small wireless facility. The staff report for the January 21, 2026 Planning Commission meeting recommended approval of the project because staff, CTC, and the city special counsel determined the project was consistent with the code. The application demonstrated that the proposed site was the least intrusive means to address the coverage gap in the area.

**Coverage Gap:** The applicant addressed the maps from Verizon's website and the FCC national broadband maps showing 4G service in the area of the coverage gap. They stated that the market maps have limited applicability to small cell network design.

Sequoia Deployment Services elaborates that those maps do not take network changes, call traffic volume, technical limitations, and changes in the technology and the surrounding environment. These additional factors are what was covered by the PierCon report that demonstrated a significant coverage gap. The applicant states that the Verizon and FCC maps have been rejected by courts previously as they do not rebut the existence of a coverage gap. The applicant then briefly confirms that, as stated in the previous staff report, commingled service is subject to the same regulations as communication only equipment. They further state that the city cannot require Verizon to provide telecommunication only services.

**Design:** Sequoia Deployment Service's letter proceeds to analyze the design concerns raised by the concerned residents. The letter covers the inability for the carrier to underground the accessory equipment as it would be more intrusive, requiring a sidewalk, protective bollards, and a gutter to redirect water. The antenna would need to be on the utility pole, and the PG&E meter would need to be accessible to PG&E on a meter pedestal next to the underground equipment. The applicant then describes the required height increase to maintain the 6' clearance between the antenna and primary power lines. The PG&E pole is being replaced in the same location and will be increasing in height from 38'-11" to 46'-4" to accommodate the required clearance between an antenna and primary power lines. The letter then clarifies that any future collocations would likely be technically infeasible due to a lack of space on the utility pole for any accessory equipment for other carriers.

**Location:** The location section of the letter covers concerns regarding placement in the right-of-way in the Single Family Residential (R-1) zoning district. The applicant reiterates that there are no technically feasible and viable private parcel locations for placement, "leaving only the public right-of-way". The location in the public right-of-way meets all standards for placement with the approval of the two special exceptions. The

applicant asserts that the proposed facility is being placed on an existing PG&E utility pole and that the wireless facility would not trigger a review of the Secretary of the Interior's Standards for the adjacent historic property. The letter then proceeds to discuss visual impacts. The applicant argues that due to the minimal equipment, stealthed/shrouded design, and placement on an existing utility pole, the site should not have any visual impacts on the surrounding homes.

**Property Values:** The applicant states that property values will not be affected by the proposed wireless facility. The letter includes a report from Joint Venture Silicon Valley as exhibit A. The report debunks the New Zealand study regarding loss in property values and states that there is an increase in property values of real estate after construction of wireless facilities within their proximity.

**Environmental Review:** The applicant letter concludes with a section on environmental review. The applicant reasserts that the site is categorically exempt from CEQA under class 3 because they are proposing minimal equipment on a replacement utility pole in the same location as an existing utility pole. They provide several legal cases where courts have ruled that similar deployments are categorically exempt from CEQA. They reiterate that the project will not have any negative effect on the adjacent historic property and refer to the analysis in section four of their letter.

**Staff analysis:** The project as proposed is compliant with the Carmel Municipal Code (CMC) Section 17.46, Telecommunications and Wireless Facilities regarding design, environmental review, and property values. Sequoia Deployment Services provided Supplemental Report #2 from PierCon, which covers further technical concerns raised by residents and the Planning Commission in the January 21, 2026 Planning Commission meeting. The PierCon Supplemental Report #2 does bring into question whether the Golden Bough would be a technically viable alternate site if it had a macro design. Further analysis of the Golden Bough Theater with an alternative macro site design is discussed later in the staff report.

#### PierCon Supplemental Report #2

PierCon provided an additional report after the January 21, 2026 Planning Commission meeting to respond to technical concerns that were raised. The report was divided into thirteen sections covering deployed technology, interference with emergency service communication, the Golden Bough Theater, network optimization, and a further analysis of the coverage gap.

PierCon sufficiently addresses the concerns raised in the meeting regarding coverage gaps, aligning with CTC confirmation that a coverage gap exists. The report goes into greater detail regarding the data used to show the coverage gap in the proposed area.

The report also states there will be no effect on emergency services, which was a question from the Planning Commission at the January 21, 2026 meeting.

The largest section of the report is regarding the placement of a macro facility on the Golden Bough theater. The ability to place a viable facility on the Golden Bough

theater is relevant to whether Verizon has met the special exception criteria and thus is able to deploy in the public right-of-way in an R-1 zone. The report states, "Additional best-server modeling was performed to assess whether the site could be made viable under more aggressive and constrained design parameters. The only configuration that produced marginally acceptable modeled results required" antenna heights at roughly 37' (antenna centerline of 34'), azimuths of 220 and 330, and narrow beamwidth antenna. The report further states that even with this design the modeling results would need to be evaluated against field conditions. PierCon raises concerns about the large trees along the west property line of the Golden Bough stating, "multiple large trees along Casanova Street fall directly within each antenna's main radiation pattern. These trees exceed the height of a potential 34-foot antenna [centerline] installation and would significantly attenuate midband signals." The section of the report concludes that facility on the Golden Bough does not represent a feasible or equivalent RF alternative to the proposed site.

**Staff analysis:** The PierCon report sufficiently addresses all technical concerns raised by the Planning Commission and concerned residents except for the analysis of the Golden Bough theater as a viable alternative. The report confirms that services provided by Verizon will not affect emergency services. The report also addresses the potential deployment of other technology or network optimization to address the coverage gap.

The Golden Bough analysis brings into question whether it is a viable site or not. PierCon states that the macro design that would require taller, more powerful, and more focused, narrow beam antennas would address the coverage gaps in models, but that does not consider field conditions. The report states that the trees adjacent to the site would cause significant signal attenuation. CTC has confirmed that modelling does show that a wireless facility at the Golden Bough Theater would be able to address the coverage gap, confirming the information presented by PierCon in the Supplemental Report #2. The issue is that the PierCon report indicates that the model cannot take the effect of the adjacent trees into account. **The Planning Commission must determine whether the Applicant has met its burden to show the Golden Bough Theater is not a viable and available alternative location to address the coverage gap.**

Based on the limited information presented in the PierCon Supplemental Report #2, the Golden Bough Theater would require one special exception from the requirements of the CMC, versus the two exceptions required for the proposed small wireless facility. The Golden Bough Theater as designed requires a special except for height because the maximum height for the A-1 zoning district is 24'. Carmel Municipal Code (CMC) Section 17.46.040.F.1.b states that wireless facilities "may not exceed more than 10['] above the maximum height allowed by this code for the underlying zoning district." The macro site parameters discussed in the PierCon report was for roughly 7.5' tall antenna with an antenna centerline height of 34', meaning the elevation of the top of the antenna would be approximately 37.5'.

If the Planning Commission determines that the concerns about the trees are sufficient to deem the Golden Bough Theater technically infeasible, then the proposed small wireless facility is the least intrusive means to address the coverage gap. If the Planning Commission determines that the concerns about the trees are **not** sufficient to deem the Golden Bough Theater infeasible, then the Golden Bough Theater would be the least intrusive means to address the coverage gap because it only requires one special exception.

*Findings:*

Pursuant to [Carmel Municipal Code \(CMC\) Section 17.46.080.A.1 Required Findings for Approval](#), the reviewing authority may approve wireless facility applications only when the reviewing authority makes all the following findings:

a. The proposed wireless facility will not result in adverse visual impacts or have an adverse impact on property values because it complies with all applicable development standards in CMC § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines;

*Staff Analysis:* The proposed application meets all applicable design guidelines and standards with two exceptions. As outlined below the applicant meets the required findings for the requested exceptions.

b. If applicable, to the extent the proposed wireless facility does not comply with all applicable development standards in CMC § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines, the applicant has requested a special exception and the findings for granting a special exception pursuant to subsection (C) of this section can be made;

*Staff Analysis:* As demonstrated in the Special Exceptions Findings discussion below, the applicant has applied for 2 special exceptions and the Planning Commission must decide based on the evidence in the record if the project meets the required findings.

c. The proposed wireless facility will comply with all applicable FCC regulations and guidelines for human exposure to RF emissions and will not, either individually or cumulatively with other transmitters in the vicinity, result in RF exposures that exceed the FCC's maximum permissible exposure level for the general population;

*Staff Analysis:* The site is compliant with all applicable FCC regulations and guidelines regarding radio frequency emissions. The applicant provided an RF report from a third-party engineer that confirms that the site will meet FCC radio frequency emission standards. The CTC Report confirms that the site will comply.

d. The proposed wireless facility will comply with all applicable fire safety and public safety standards;

*Staff Analysis:* The applicant meets all applicable City's standards in Carmel Municipal Code (CMC) Section 17.46 and the administrative guidelines related to fire safety and public safety. The plans that there will be a disconnect switch for power integrated into the PG&E smart meter. Additionally, the applicant provided a detail for the required RF warning signage below the antenna. The equipment will be grounded per the project

plans. The Building Division will review the project to confirm that it complies with the California Public Utilities Commission (CPUC) General Order (GO) 95. The proposed Small Wireless Facility will also be subject to a condition of approval that it be in compliance with all Federal and State requirements. (Condition of Approval #11).

e. The proposed wireless facility will comply with fall zone requirements in the Administrative Detailed Wireless Facility Design Guidelines;

*Staff Analysis:* N/A. Fall protection is a guideline for towers on parcels. The applicant is not proposing to install or attach its facility to a tower on a parcel.

f. All public notices required for the application have been given;

*Staff Analysis:* A notice of application submittal and notice of public hearing have been posted on site, hand delivered to neighbors within 100 feet, and mailed to all neighbors within 500 feet. Additionally, application materials have been posted on the city website since October 15, 2025.

g. All the findings required for a use permit pursuant to CMC § 17.64.010;

1. That the proposed use will not be in conflict with the City's General Plan.

*Staff Analysis:* The City's General Plan does not speak directly to wireless facilities but at the time it was adopted (2003) cell phones were not a predominant means for public communication. The General Plan Community Infrastructure section of the Land Use and Community Character Element recognizes generally that the "ongoing improvement of public and private property must rely on adequate public services. When such services are constrained, efforts must be made either to increase their capacity or to allocate their use for the greatest benefit. (LUP)" The Community Infrastructure section further states, "In Carmel-by-the-Sea, the most critical infrastructure needs for the future are water, roads, and drainage. The improvement of property creates opportunities to implement long-term infrastructure plans that benefit the whole community such as utilities undergrounding and improved communications infrastructure. (LUP)". The updated wireless ordinance and guidelines are consistent with the city's long term communication infrastructure plans, creating specific requirements to ensure the deployment of wireless facilities will occur in a way that benefits the community without detracting from the Carmel-by-the-Sea character. The deployment of wireless facilities that meet the rigorous requirements outlined in the ordinance implements the communication infrastructure goals. Objective O6-1 of the Public Facilities and Services Elements states, "Cooperate with other governmental and private agencies in providing needed local facilities for fulfillment of the public safety, cultural and recreational needs of the community." The proposed use will not conflict with the General Plan and is aligned with the city's goal of cooperating with private agencies to provide needed local facilities needed to fulfil residents' public safety, cultural, and recreational needs.

2. That the proposed use will comply with all zoning standards applicable to the

use and zoning district.

*Staff Analysis:* With the approval of the two requested Special Exceptions, the proposed Small Wireless Facility meets all the applicable zoning standards outlined in the Carmel Municipal Code.

3. That granting the use permit will not set a precedent for the approval of similar uses whose incremental effect will be detrimental to the City, or will be in conflict with the General Plan.

*Staff Analysis:* Granting this approval will not set a precedent that will be incrementally detrimental to the city or conflict with the General Plan. As stated above, the General Plan recognizes the need for the creation and improvement of service to the residents and Objective 6-1 encourages the city's cooperation with private agencies to provide local facilities for fulfilling the residents' needs. The application meets all standards and design guidelines for wireless facilities with the approval of the special exceptions. The city requires supplemental materials to prove the need for the special exceptions.

Approval of the special exceptions for this site would not set a precedent and would not guarantee the approval of similar sites in the future if the city is not able to make the required findings for future facilities.

4. That the proposed use will not make excessive demands on the provision of public services, including water supply, sewer capacity, energy supply, communication facilities, police protection, and fire protection.

*Staff Analysis:* The proposed Small Wireless Facility will not have an impact on water, sewer, police, or fire. The facility will improve public services for wireless communication. At the time of writing this report, the city has received no evidence that the proposed Small Wireless Facility would have any effect on energy supply to the residents.

5. That the proposed use will not be injurious to public health, safety or welfare.

*Staff Analysis:* As stated previously in the report, the proposed Small Wireless Facility will meet all standards for radio frequency and other public safety standards. The CTC Report confirmed that the radio frequency report shows the site will meet the FCC radio frequency emissions standards. The facility will include a power disconnect, grounding well, and FCC safety signage. The site meets all applicable standards for health, safety, and welfare.

6. That the proposed use will be compatible with surrounding land uses and will not conflict with the purpose established for the district within which it will be located.

*Staff Analysis:* The site is in the public right-of-way in Single-Family Residential (R-1) Zone which is highly incompatible for wireless facilities. The applicant has provided the required supplemental materials for special exception to placement in the R-1 zone.

The findings required for the special exception can be made and therefore the facility is allowed to be in the R-1 zone. It will improve public services for wireless communication by residents and visitors and as such will not conflict with the purpose established for the district.

7. That the proposed use will not generate adverse impacts affecting health, safety, or welfare of neighboring properties or uses.

*Staff Analysis:* As stated previously in the report, the proposed Small Wireless Facility will meet all standards for radio frequency and safety standards. The CTC Report confirmed that the radio frequency report shows the site will meet the FCC radio frequency emission standards. The facility will have a power disconnect, grounding well, and FCC safety signage. The site meets all applicable standards for health, safety, and welfare and will not generate adverse impacts.

h. All the findings for discretionary design review approval pursuant to CMC § 17.58.060;

1. Conform to the applicable policies of the General Plan and the Local Coastal Program;
2. Comply with all applicable provisions of this code; and
3. Are consistent with applicable adopted design review guidelines.

*Staff Analysis:* As demonstrated in Carmel Municipal Code Standards, General Plan, and Administrative Detailed Wireless Facility Design Guidelines discussions contained within this report, the project meets all design review findings. It is compliant with the Carmel Municipal Code, Design Guidelines, General Plan, Health and Safety requirements.

i. If applicable, all the findings required for a coastal development permit.

1. That the project as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified City of Carmel-by-the-Sea Local Coastal Program; and
2. If the project is located between the first public road and the sea, that the project

is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code).

**Staff Analysis:** A Coastal Development Permit is required for the proposed Small Wireless Facility. Carmel Municipal Code (CMC) Section 17.52.100.D provides the limits to exemptions from Coastal Development permits. CMC Section 17.52.100.D.1 lists improvements to structures located in area designated highly scenic. The Carmel-by-the-Sea General Plan, certified by the Coastal Commission, states, “The incorporated limits of the City of Carmel-by-the-Sea shall be designated a special community and a highly scenic area within the meaning of Coastal Act sections 30251 and 30253 and for the purposes of implementing section 30610 and corresponding regulation section 13250 of the California Code of Regulations. New development shall protect this special community and its unique characteristics.” Therefore, the wireless facility is considered improvements to a structure in an area designated highly scenic and requires a Coastal Development Permit.

As described earlier in the report, the project conforms with the city’s General Plan. The Local Coastal Program is incorporated into the General Plan. The Local Coastal Program does not address wireless facilities specifically but does have a stated objective of the city cooperating with private agencies to in providing needed local facilities for fulfillment of the public safety, cultural, and recreational needs of the community. The project conforms with the Local Coastal Program.

**Special Exception Findings:** As noted earlier, the applicant has requested two special exceptions be granted as its proposed facility does not comply with two location standards in CMC Section 17.46.050.E. The relevant location standards are: Sec. 17.46.040.E.1.a - placement within the single-family residential zoning district which is designated as a highly incompatible location in the public right-of-way, and Sec. 17.46.040.E.2.a – placement in the public right of way directly in front of the areas which are five feet in either direction from the centerline of each entry door or window in the front façade of any occupied residential building.

To support its requests, the applicant submitted several technical reports and two letters from its attorneys, attached at the end of this staff report as Attachments \_\_\_*[include PierCon Oct 14, 2025 report, detailed link budget and 3 excel spread sheets (these were in Attachment 11 of application), PierCon supplement Nov. 19, 2025 (provided with response to first NOI), Verizon Alternatives Analysis Oct 14, 2025 (Attachment 12 of application), Oct. 14 M&A letter (provided with application)*[\[1\]](#)*, Nov. 21 M&A letter (provided with response to first NOI).]*

City staff hired an independent engineering consultant, CTC, to review the technical justifications provided by the applicant. CTC’s report is attached at the end of this staff report as Attachment 10.

Pursuant to [Carmel Municipal Code \(CMC\) Section 17.46.080.C](#), the reviewing authority, in this case the Planning Commission, shall not grant any special exception unless it makes three findings in Section 17.46.080.C.2 discussed below:

a. The applicant has shown that denial of an application will result in an effective prohibition or otherwise violate Federal law; or the applicant has shown that denial of an application will violate State law; or the applicant has shown that it is a minor deviation that achieves all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines;

*Staff Analysis:* To support this exception finding for placement of this proposed facility in the public right-of-way in a single-family residential zoning district (Sec. 17.46.040.E.1.a) and directly in front of the areas which are five feet in either direction from the centerline of each entry door or window in the front façade of any occupied residential building (Sec. 17.46.040.E.2.a), the applicant submits that denial of the application will result in an effective prohibition under Federal law and that the denial will violate State law. For the reasons discussed below, the Planning Commission must determine if the applicant has met the burden on this exception finding for these two placement restrictions for this proposed facility regarding the effective prohibition claim and the state law claim.

Effective Prohibition Claim: To support its effective prohibition claim, the applicant makes arguments that it meets both legal standards for demonstrating an effective prohibition in the Ninth Circuit, the significant gap/least intrusive means standard and the materially inhibits standard. The significant gap/least intrusive means test requires the applicant to show that (1) a “significant gap” in the applicant’s service coverage exists; and (2) the proposed facility was the “least intrusive means” to mitigate the significant gap, having considered alternatives.<sup>[2]</sup> The Ninth Circuit defines the “least intrusive means” as the technically feasible and potentially available alternative site that most closely conforms to the local values that would be upheld by a denial.<sup>[3]</sup> The materially inhibits standard provides that “a state or local legal requirement constitutes an effective prohibition if it materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.”<sup>[4]</sup> This test also applies “not only when filling a coverage gap but also when densifying a wireless network, introducing new services or otherwise improving service capabilities.”<sup>[5]</sup>

The applicant relies on the PierCon reports (including drive test data) to demonstrate that there are significant gaps in reliable network coverage (due to a combination of service coverage gaps in some bands and poor signal quality in available service) and capacity in the area, and the facility is needed to address the gaps, improve existing services and add 5G service. The applicant relies on the Alternatives Analysis to demonstrate that the applicant’s preferred location is the least intrusive means to address the identified service deficiencies. The Alternatives Analysis explains why there were no viable options in the City’s preferred zones, for collocation, or for placement of a facility on private property that could address the identified service

deficiencies. The PierCon report examined 40 utility poles in the service gap area for viable poles and found the majority were not feasible, would not meet code requirements or presented other technical issues. The Alternatives Analysis reviewed 28 utility poles in the right-of-way (including the pole proposed for use) and explained why most poles were technically infeasible primarily because placement is not allowed by PG&E standards (alternatives 2-16). While the applicant's Alternatives Analysis shows there are other poles that are technically feasible and available (including some that would comply with Sec. 17.46.040.E.2.a), each of these poles is more intrusive than the applicant's preferred pole because they were less compliant with the City's wireless standards overall (alternatives 17-28). CTC's first report confirmed the applicant's technical claims about service quality issues, service gaps and the lack of collocation alternatives. Staff confirmed the preferred pole was the most Code-compliant available option among the 28 alternatives in the public right-of-way. Thus, the applicant had demonstrated that it meets these exceptions finding under the Ninth Circuit's significant gap/least intrusive means standard for effective prohibition.

Based on the information received in the PierCon Supplemental Report #2 after the January 21, 2026, Planning Commission meeting, the Planning Commission must determine if the Applicant has met its burden to demonstrate that a macro site at the Golden Bough is not a technically feasible and available alternative to the proposed small wireless facility. If the Planning Commission determines that concerns raised about large trees adjacent to the Golden Bough Theater making the theater location technically infeasible then the applicant has presented appropriate information to make this finding. If the Planning Commission determines that the Applicant has not demonstrated adequately that the Golden Bough Theater is technically feasible, then this finding cannot be made because the Theater would require less special exception to the Carmel Municipal Code, making it the least intrusive means of addressing the coverage gap. CTC has confirmed that the modeling shows that the configuration shown in the PierCon Supplemental Report #2 shows that the Golden Bough Theater is technically viable. Additionally, CTC has states that "while the computer model we use takes into account "cluXer loss" from nearby building and trees in the area using data gathered from satellite mapping, the granularity of the data does not reach down to individual tree level." As the governing body, the Planning Commission must determine, ultimately, if they are able to make this finding based on the evidence and analysis presented.

#### Materially Inhibits Standard.

This test for effective prohibition has only recently been applied to wireless facilities and there is less guidance available from the courts. According to the FCC, the materially inhibits standard provides that "a state or local legal requirement constitutes an effective prohibition if it materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment."<sup>[6]</sup> The FCC states this test applies "not only when filling a coverage gap but also when densifying a wireless network, introducing new services or otherwise improving service capabilities."<sup>[7]</sup> Some courts have found that the "materially inhibits" standard requires the "totality of the circumstances" to be considered.<sup>[8]</sup> One court

stated the relevant criteria are a demonstration of “insufficiency of coverage, a lack of alternatives available to a proposed site; unreasonable costs imposed on, or asked of, the carrier; and unreasonable delay in making the decision.”<sup>[9]</sup> The court went on to say: “No one element is likely decisive, and a combination of these factors could ‘add up’ to material inhibition, but a carrier’s need for a tower and the availability of other sites may well be particularly significant.”<sup>[10]</sup> Finally, the same court emphasized “even the FCC’s new, lenient standard requires a showing of *material – not de minimis* – inhibition; in other words, the effective-prohibition test is not toothless.”<sup>[11]</sup> That court determined the evidence showed another location was technologically and economically feasible and thus the denial did not materially inhibit the carrier’s ability to provide wireless services.<sup>[12]</sup> If the Planning Commission finds that the Applicant has met its burden under this standard, the special exceptions should be granted.

State Law Claim: The applicant need only demonstrate one basis for this exception finding but has offered a second with regard to Carmel Municipal Code (CMC) Section 17.46.040.E.1.a’s restriction of facilities in the R-1 zone right-of-way. The applicant makes brief legal arguments that denial of the application would violate its statutory franchise to use the public rights-of-way (Pub. Util. Code Section 7901) because that law preempts Carmel Municipal Code (CMC) Section 17.46.040.E.1.a’s restriction on facilities in the R-1 zone right-of way. Verizon Wireless made a similar facial preemption claim during the City’s wireless ordinance adoption process and before the California Coastal Commission. The City has repeatedly disagreed that this ordinance provision is facially preempted by state law. Rather than conflicting with Section 7901, specifying areas for heightened review due to particular attributes of the area is consistent with the City’s authority under Section 7901 to ensure placements do not “incommode” the public use. Therefore, the applicant has not provided adequate justification for this exception finding simply by repeating its assertion that the restriction itself violates state law.

b. The special exception requested by the applicant does not compromise or excuse compliance with any fire safety or other public health and safety requirements; and

Staff Analysis: Granting special exceptions for the proposed Small Wireless Facility will not compromise or excuse any fire or public health and safety requirements. The site is compliant with all applicable regulations of the CPUC General Order 95 and meets all other design and location requirements of the Code. The facility will be on a replacement utility pole to be installed in close proximity (or the same location) as the existing pole, and it will not include any ground-mounted equipment. As such it adds no new facilities in locations that might impact access and use of the public rights-of-way or cause interference with the performance of emergency personnel.

c. The special exception is narrowly tailored such that any deviation from the requirements of this chapter is only to the extent necessary for compliance with Federal or State law or to achieve all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines.  
Staff Analysis: The special exception is narrowly tailored to allow deviation from only

two requirements for this facility based on the specific showings made in this application only to the extent necessary for compliance with federal law.

*Environmental Review – Approval of the Project:*

If the Planning Commission finds that the project can be approved, staff recommends the project be found categorically exempt from the California Environmental Quality Act (CEQA), State CEQA guidelines, and local environmental regulations, pursuant to Section 15303 (Class 3) (New Construction or Conversion of Small Structures) and Section 15304 (Class 4) (Minor Alterations to Land). Class 1 exemptions include the operation, maintenance, permitting, and minor alterations to existing private structures involving negligible or no expansion of an existing or former use. Class 2 exemptions consist of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Class 3 exemptions consist of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Class 4 exemptions consist of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. The project consists of the placement of Verizon telecommunication equipment on a replacement PG&E utility pole in the public right-of-way. PG&E pole replacement and the addition of similar sized equipment on utility poles is not uncommon in town. The proposed project does not present any unusual circumstances that would result in a potentially significant environmental impact. The historic home adjacent to the proposed facility will not be affected. No exceptions to the exemption exist pursuant to section 15300.2 of the CEQA Guidelines. In reviewing the DPR form describing why the house was listed as historic the very minimal change in the outward views from within the house and inward views of the house from the street that will result from the project proves there will not be any material alteration to the physical characteristics of the historic home which justified its inclusion in the local register of historic resources (i.e., work of well known Carmel contractor/builder and the unique styles, materials and orientation of the house.

*Environmental Review – Denial of the Project:*

If the Planning Commission finds that the project cannot be approved, as proposed and conditioned, staff recommends that pursuant to CEQA regulations, the Application is *Statutorily Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15270(a) of the CEQA Guidelines (Projects Which Are Disapproved) which states that CEQA does not apply to projects which a public agency rejects or disapproves.*

[1] The applicant also included an unsigned draft letter dated October 13, 2025 in the application materials and subsequently advised the City in writing that the draft was

inadvertently included and should be disregarded.

[2] See *MetroPCS, Inc. v. City and Cnty. of San Francisco*, 400 F.3d 715, 732-34 (9th Cir. 2005)

[3] *Am. Tower Corp. v. City of San Diego*, 763 F.3d 1035, 1056 (9th Cir. 2014).

[4] *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, 33 FCC Rcd 9088 (2018) (“*Small Cell Order*”) at 9103, ¶ 35 (internal quotations omitted); *City of Portland v. US*, 969 F.3d 1020 (9th Cir. 2020).

[5] *Small Cell Order* at 9104-9105, ¶ 37 n.85.

[6] *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, 33 FCC Rcd 9088 (2018) (“*Small Cell Order*”) at 9103, ¶ 35 (internal quotations omitted); *City of Portland v. US*, 969 F.3d 1020 (9th Cir. 2020).

[7] *Small Cell Order* at 9104-9105, ¶ 37 n.85.

[8] *Cellco P’ship v. White Deer Twp. Zoning Hearing Bd.*, 74 F.4th 96, 100-106 (3d Cir. 2023).

[9] *TowerNorth Development, LLC v. City of Geneva*, 2024 WL 621616, \*24-25 (N.D. Ill. Feb. 14, 2024).

[10] *Id.*

[11] *Id.*

[12] *TowerNorth Development, LLC v. City of Geneva*, 2025 WL 975753, (N.D. Ill. Mar. 31, 2025); *mot. for recon. den’d TowerNorth Dev., LLC v. City of Geneva*, 2025 WL 3764865, at \*9 (N.D. Ill. Dec. 30, 2025).

## Other Project Components:

## ATTACHMENTS:

1. Attachment 1 - Resolution approval
2. Attachment 2 - Resolution deny
3. Attachment 3 - Project Plans
4. Attachment 4 - CTC Report
5. Attachment 5 - PierCon Supplemental Report 2
6. Attachment 6 - VzW Responses Volume 1
7. Attachment 7 - VzW Responses Volume 2
8. Attachment 8 - Strauss Letter
9. Attachment 9 - Previous Report and Reference Materials

**CITY OF CARMEL-BY-THE-SEA  
PLANNING COMMISSION**

**PLANNING COMMISSION RESOLUTION NO. 2026-XXX-PC**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARMEL-BY-THE-SEA FINDING THE PROJECT EXEMPT FROM ENVIRONMENTAL REVIEW PURSUANT TO CEQA GUIDELINES SECTION 15303 AND 15304 AND THAT NONE OF THE EXCEPTIONS TO THE EXEMPTIONS CONTAINED IN SECTION 15300.2 CAN BE MADE IN THIS CASE; AND APPROVING A USE PERMIT, DESIGN REVIEW, AND COASTAL DEVELOPMENT PERMIT FOR THE CONSTRUCTION OF A NEW SMALL WIRELESS FACILITY ON A REPLACEMENT PG&E UTILITY POLE. THE PROPERTY IS LOCATED IN THE PUBLIC RIGHT-OF-WAY IN FRONT OF CARMELO STREET 4 SOUTHEAST OF 10<sup>TH</sup> AVENUE IN THE SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT.**

WHEREAS, Sequoia Deployment Services, Inc., on behalf of Verizon Wireless (“Applicant”), submitted an application requesting approval of a Use Permit, Design Review, and Coastal Development Permit application (“DR 25313 & UP 25314 [Verizon Sequoia Deployment]”) described herein (“Application”); and

WHEREAS, the applicant is proposing to construct a Small Wireless Facility on a replacement PG&E utility pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District; and

WHEREAS, installation of Small Wireless Facilities on replacement poles requires approval of a Type III Conditional Use Permit application, including Design Review, and a Coastal Development permit by the Planning Commission (Carmel-by-the-Sea Municipal Code [CMC] Section 17.46.050.A.1.c); and,

WHEREAS, on January 9, 2026, a notice of public hearing was published in the Carmel Pine Cone for the January 21, 2026, Planning Commission meeting in compliance with State law (California Government Code 65091) and mailed to owners of real property within a 500-foot radius of the project indicating the date and time of the public hearing; and

WHEREAS, on or before January 11, 2026, the Applicant posted the public notice on the project site and hand-delivered a copy of the public notice to each property within a 100-foot radius of the project site indicating the date and time of the public hearing; and

WHEREAS, on or before January 16, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on January 21, 2026, the Planning Commission held a public hearing to receive public testimony regarding the Application, including without limitation, information provided to the Planning Commission by City staff and through public testimony on the project; and

WHEREAS, on January 21, 2026, the Planning Commission continued the hearing on the project to a date certain to February 4, 2026, due to the volume of correspondence that the city received within 24 hours of the meeting; and

WHEREAS, on or before January 25, 2026, the Applicant posted the public notice on the project

site and hand-delivered a copy of the public notice to each property within a 100-foot radius of the project site indicating the date and time of the public hearing; and

WHEREAS, on or before January 30, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on February 4, 2026, the Planning Commission continued the hearing on the project to a date certain to February 10, 2026, due to staff's need for additional time to review continued correspondence from the public and the applicant; and

WHEREAS, on or before February 6, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on February 10, 2026, the Planning Commission held a public hearing to receive public testimony regarding the Application, including without limitation, information provided to the Planning Commission by City staff and through public testimony on the project; and

WHEREAS, this Resolution and its findings are made based upon the evidence presented to the Commission at the hearing date, including, without limitation, the staff report and attachments submitted by the Community Planning and Building Department; and

WHEREAS, the Planning Commission did hear and consider all said reports, recommendations, and testimony herein above set forth and used their independent judgment to evaluate the project; and

WHEREAS, the California Environmental Quality Act (California Public Resources Code §§ 21000, *et seq.*, "CEQA"), together with State Guidelines (14 California Code Regulations §§ 15000, *et seq.*, the "CEQA Guidelines") and City Environmental Regulations (CMC Chapter 17.60) require that certain projects be reviewed for environmental impacts and that environmental documents be prepared; and

WHEREAS, the project is for the construction of a Small Wireless Facility on a replacement PG&E utility pole. Therefore, pursuant to CEQA regulations, the project qualifies as categorically exempt under CEQA Guidelines Section 15301 (Existing Facilities), 15302 (Replacement or Reconstruction), Section 15303 (New Construction or Conversion of Small Structures), and Section 15304 (Minor Alterations to Land). Class 1 exemptions include the operation, maintenance, permitting, and minor alterations to existing private structures involving negligible or no expansion of an existing or former use. Class 2 exemptions consist of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Class 3 exemptions consist of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Class 4 exemptions consist of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.; and

WHEREAS, pursuant to Section 15300.2 of the CEQA Guidelines, the proposed use does not present any unusual circumstances that would result in a potentially significant environmental impact, and there are no applicable exceptions to the exemption; and

WHEREAS, the facts set forth in the recitals are true and correct and are incorporated herein by

reference.

**NOW THEREFORE, BE IT RESOLVED**, that the Planning Commission of the City of Carmel-By-The-Sea does hereby make the following findings and determinations:

**Section 1: FINDINGS REQUIRED FOR USE PERMIT APPROVAL (CMC Chapter 17.64), DESIGN REVIEW AND COASTAL DEVELOPMENT PERMIT.** For each of the required findings listed below, staff has indicated whether the submitted plans support the adoption of the findings. For all findings checked "no" the staff report discusses the issues to facilitate the Planning Commission's decision-making. Findings checked "yes" may or may not be discussed in the report depending on the issues.

<b>Municipal Code Findings – CMC Section 17.64.010 General Findings Required for All Use Permits</b>	<b>YES</b>	<b>NO</b>
1. The proposed use will not conflict with the City's General Plan.	✓	
2. That the proposed use will comply with all zoning standards applicable to the use and zoning district.	✓	
3. That granting the use permit will not set a precedent for the approval of similar uses whose incremental effect will be detrimental to the City or will be in conflict with the General Plan.	✓	
4. That the proposed use will not make excessive demands on the provision of public services, including water supply, sewer capacity, energy supply, communication facilities, police protection, and fire protection	✓	
5. That the proposed use will not be injurious to public health, safety, or welfare.	✓	
6. That the proposed use will be compatible with surrounding land uses and will not conflict with the purpose established for the district within which it will be located.	✓	
7. That the proposed use will not generate adverse impacts affecting the health, safety, or welfare of neighboring properties or uses.	✓	
<b>Municipal Code Findings – CMC Section 17.46.080.A Findings Required for Type 1 to IV Applications</b>		
1. The proposed wireless facility will not result in adverse visual impacts or have an adverse impact on property values because it complies with all applicable development standards in CMC § <a href="#">17.46.040</a> and the Administrative Detailed Wireless Facility Design Guidelines.	✓	
2. If applicable, to the extent the proposed wireless facility does not comply with all applicable development standards in CMC § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines, the applicant has requested a special exception and the findings for granting a special exception pursuant to subsection (C) of this section can be made.	✓	
3. The proposed wireless facility will comply with all applicable FCC regulations and guidelines for human exposure to RF emissions and will not, either individually or cumulatively with other transmitters in the vicinity, result in RF exposures that exceed the FCC's maximum permissible exposure level for the general population.	✓	
4. The proposed wireless facility will comply with all applicable fire safety and public safety standards.	✓	
5. The proposed wireless facility will comply with fall zone requirements in the Administrative Detailed Wireless Facility Design Guidelines.	✓	
6. All public notices required for the application have been given.	✓	
7. All the findings required for a use permit pursuant to CMC § <a href="#">17.64.010</a> .	✓	

8. All the findings for discretionary design review approval pursuant to CMC § <a href="#">17.58.060</a>	✓	
<ul style="list-style-type: none"> <li>Conform to the applicable policies of the General Plan and the Local Coastal Program</li> </ul>	✓	
<ul style="list-style-type: none"> <li>Comply with all applicable provisions of this code</li> </ul>	✓	
<ul style="list-style-type: none"> <li>Are consistent with applicable adopted design review guidelines</li> </ul>	✓	
9. If applicable, all the findings required for a coastal development permit.	✓	
<ul style="list-style-type: none"> <li>The project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified City of Carmel-by-the-Sea Local Coastal Program.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>If the project is located between the first public road and the sea, the project conforms with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code).</li> </ul>	✓	
<b>Municipal Code Findings – CMC Section 17.46.080.C Special Exceptions for Federal or State Preemption or Minor Deviations in Design (Types I to IV Only)</b>		
1. The applicant has shown that denial of an application will result in an effective prohibition or otherwise violate Federal law; or the applicant has shown that denial of an application will violate State law; or the applicant has shown that it is a minor deviation that achieves all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines.	✓	
2. The special exception requested by the applicant does not compromise or excuse compliance with any fire safety or other public health and safety requirements.	✓	
3. The special exception is narrowly tailored such that any deviation from the requirements of this chapter is only to extent necessary for compliance with Federal or State law or to achieve all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines.	✓	

**Section 2: CEQA FINDINGS.** The Planning Commission of the City of Carmel-by-the-Sea does hereby FIND the project categorically exempt from environmental review pursuant to CEQA Guidelines Section 15303 and 15304 and no exceptions to the exemptions contained in Section 15300.2 can be made in this case,

**Section 3: CONDITIONS OF APPROVAL.** Approval of the Use Permit, Design Review, and Coastal Development permit for the construction of a Small Wireless Facility on a replacement PG&E utility pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District is subject to the following Conditions of Approval:

**A. General.**

1. **Permit Term.** This permit will automatically expire 10 years and one day from its issuance unless pursuant to another provision of the Municipal Code or these conditions, it expires sooner or is terminated. Unless an extension or renewal has been granted, the permittee must either (1) remove the facility within thirty (30) days following the permit's expiration (provided that removal of any structure supporting the wireless facility that is owned by City, a utility, or another entity, need not be removed, but must be restored to its prior condition, except as specifically permitted by the City); or (2) at least ninety (90) days prior to expiration, submit an application to renew the permit, which application must, among all other requirements, demonstrate that the impact of the wireless facility cannot be reduced. The wireless facility may remain in place under this permit until the City takes final action

on the application.

2. **Future Collocations.** The permittee shall be willing to allow other carriers and site operators to collocate transmission equipment with the wireless facility, to the extent such facility or portions thereof are owned or controlled by the permittee, whenever technically feasible and aesthetically desirable in accordance with applicable provisions in the City's Municipal Code.
3. **CPUC GO-159A Certification.** Within 15 business days after the City issues a permit, the permittee shall serve copies of California Public Utility Commission notification letters required by CPUC General Order No. 159A to the City Clerk, Director and City Administrator.
4. **City's Standing Reserved.** The City's grant or grant by operation of law of a permit does not waive, and shall not be construed to waive, any standing by the City to challenge any provision in federal or state law or any interpretation thereof.
5. **Compliance with Approved Plans.** Prior to building permit issuance, the permittee must incorporate this permit, all conditions associated with this permit and any approved photo simulations into the project plans (the "**Approved Plans**"). The permittee must construct, install and operate the wireless facility in strict compliance, as determined by the approval authority, with the Approved Plans. Any alterations, modifications or other changes to the Approved Plans, whether requested by the permittee or required by other departments or public agencies with jurisdiction over the wireless facility, must be submitted in a written request subject to the approval authority's prior review and approval.
6. **Build-Out Period.** This permit will automatically expire 36 months from the approval date (the "**Build-Out Period**") unless the permittee commences installation of the wireless facility. The permittee may request in writing, and the Director may grant in writing, one six-month extension to the Build-Out Period if the permittee submits, at least 30 days prior to the automatic expiration date in this condition, justifiable cause for granting the six-month extension. If the Build-Out Period finally expires, the permit shall be automatically void but the permittee may submit a new application, which includes without limitation all application fees, for the same or a substantially similar project.
7. **Pre-Installation Requirements.** In addition to obtaining all other permits and approvals required to install, construct and/or operate the approved wireless facility, which includes without limitation any permits or approvals required by any federal, state or local public agencies with jurisdiction over the subject property, the wireless facility or its use, the permittee shall, prior to commencement of any installation or construction, attend a pre-grading meeting with the Public Works Department regarding temporary Best Management Practices ("**BMPs**") pertaining to discharges from the construction site. Before the permittee can proceed with installation or construction of the approved wireless facility, the Public Works Department must inspect and approve the permittee's installation of such temporary BMPs.
8. **Post-Installation Certifications/RF Emissions Compliance.** Within 60 calendar days after the permittee commences full, unattended operations at the wireless facility, the permittee shall provide the Director with documentation reasonably acceptable to the Director that

the wireless facility has been installed and/or constructed in strict compliance with the Approved Plans and Laws. Such documentation shall include, without limitation, as-built drawings prepared by a California licensed civil engineer, GIS data, site photographs and a written report, signed by an RF engineer under penalty of perjury, certifying that: (1) the installation is operated in compliance with 47 U.S.C. § 324 (use of minimum power); and (2) the installation complies with all applicable FCC rules and regulations for human exposure to RF emissions and will not cause members of the general public to be exposed to RF levels that exceed the maximum permission exposure levels deemed safe by the FCC.

9. **Site Maintenance.** The permittee shall keep the site, which includes without limitation any and all improvements, equipment, structures, access routes, fences, hardscape and landscape features, in a neat, clean, safe and code compliant condition in accordance with the Approved Plans and all conditions in this permit. The permittee shall keep the site area free from all litter and debris at all times. The permittee shall regularly inspect the site to determine whether any maintenance is needed. The permittee shall perform any maintenance requested by the City for compliance with this condition within a reasonable time specified by the Director in a written notice to the permittee. Routine maintenance within residential zones shall be restricted to normal construction work hours specified in the City's Municipal Code. The permittee, at no cost to the City, shall remove and remediate any graffiti or other vandalism at the site within 48 hours after the permittee receives notice or otherwise becomes aware that such graffiti or other vandalism occurred.
10. **Landscape Features.** The permittee shall replace any landscape features damaged or displaced by the construction, installation, operation, maintenance or other work performed by the permittee or at the permittee's direction on or about the site. If any trees are damaged or displaced, the permittee shall hire and pay for a licensed arborist to select plant and maintain replacement landscaping in an appropriate location for the species. Any replacement tree must be substantially the same size as the damaged tree or as otherwise approved by the City. The permittee shall, at all times, be responsible to maintain any replacement landscape features.
11. **Compliance with Applicable Laws/RF Emissions Exposure Limits.** The permittee shall maintain compliance at all times with all federal, state and local statutes, regulations, orders or other rules that carry the force of law ("**Laws**") applicable to the permittee, the subject property, the wireless facility or any use or activities in connection with the use authorized in this permit, including any Laws applicable to human exposure to RF emissions. This permit is not granting the permittee any rights to make any portion of the adjacent properties inaccessible to the general public or to hinder future lawful development of adjacent properties as a mitigation measure to ensure the wireless facility will comply with Laws applicable to human exposure to RF emissions, absent agreement from the adjacent land owner. The permittee understands that if site conditions change in the future due to lawful development on adjacent property, the permittee may need to modify or remove its wireless facility or obtain adjacent property owner consent to mitigation measures on the adjacent property if required to maintain compliance with any Laws applicable to human exposure to RF emissions. If the Director finds good cause to believe that the wireless facility is not in compliance with any Laws applicable to human exposure to RF emissions, the Director may require the permittee to submit a written report, signed by an RF engineer under penalty of perjury, that: (1) the installation is operated in compliance with 47 U.S.C. §

324 (use of minimum power); and (2) the installation complies with all applicable FCC rules and regulations for human exposure to RF emissions and will not cause members of the general public to be exposed to RF levels that exceed the maximum permission exposure levels deemed safe by the FCC. Further, the City or its contractors may perform an annual RF emissions exposure compliance test without notice to the permittee. The permittee expressly acknowledges and agrees that this obligation is intended to be broadly construed and that no other specific requirements in these conditions are intended to reduce, relieve or otherwise lessen the permittee's obligations to maintain compliance with all Laws.

12. **Adverse Impacts on Other Properties.** The permittee shall use all reasonable efforts to avoid any and all unreasonable, undue or unnecessary adverse impacts on nearby properties that may arise from the permittee's or its authorized personnel's construction, installation, operation, modification, maintenance, repair, removal and/or other activities on or about the site. The permittee shall not perform or cause others to perform any construction, installation, operation, modification, maintenance, repair, removal or other work that involves heavy equipment or machines except during normal construction work hours authorized by the City. The restricted work hours in this condition will not prohibit any work required to prevent an actual, immediate harm to property or persons, or any work during an emergency declared by the City or other state or federal government agency or official with authority to declare an emergency within the City. The Director may issue a stop work order for any activities that violates this condition in whole or in part. The permittee shall, at its sole cost and expense, repair and restore any and all damages to public and private properties that result from any activities performed in connection with the installation or maintenance of a wireless facility. The permittee shall restore such areas, structures and systems to the condition in which they existed prior to the installation or maintenance that necessitated the repairs. If the permittee fails to complete such repair within the number of days stated on a written notice by the Director may (but shall not have the obligation to) cause such repair to be completed at permittee's sole cost and expense.
13. **Noise.** If the Director finds good cause to believe that ambient noise from a facility violates applicable provisions in the City's Municipal Code, the Director, in addition to any other actions or remedies authorized by the permit, the City's Municipal Code or other applicable Laws, may require the permittee to commission a noise study by a qualified professional to evaluate the facility's compliance.
14. **Interference with City Communications Systems.** The permittee shall not permit the wireless facility authorized under this permit to interfere with any City communication systems operating on FCC-licensed frequencies. In the event that the wireless facility authorized under this permit is causing interference with any City communication systems operating on FCC-licensed frequencies, the City may notify the permittee and the permittee shall endeavor to investigate and resolve or mitigate any such interference. Any mitigation required shall be at the permittee's sole cost and expense.
15. **Inspections; Emergencies.** The City's officers, officials, staff, agents, contractors or other designees may enter onto the site and inspect the wireless facility upon reasonable prior notice to the permittee. Notwithstanding the prior sentence, the City's officers, officials, staff, agents, contractors or other designees may, but will not be obligated to, enter onto

the site area without prior notice to support, repair, disable or remove any improvements or equipment in emergencies threatening actual, imminent harm to property or persons. The permittee, if present, may observe the City's officers, officials, staff or other designees while any such inspection or emergency access occurs.

16. **Fire Safety Hazard Protocol.** If the Fire Safety Authority finds good cause to believe that the wireless facility presents an immediate fire risk, electrical hazard or other threat to public health and safety in violation of any applicable Laws, the Fire Safety Authority may notify the permittee and may order the facility to be powered down until such time as the fire threat has been mitigated. Any mitigation required shall be at the permittee's sole cost and expense.
17. **Abandonment.** The permittee shall notify the Director when the permittee intends to abandon or decommission the wireless facility authorized under this permit. In addition, the wireless facility authorized under this permit shall be deemed abandoned if the wireless facility is determined by the Director not to be operating and the permittee fails to resume operations within 90 days from a written notice from the Director. Within 90 days after a wireless facility is abandoned or deemed abandoned, the permittee, property owner and/or structure owner shall completely remove the wireless facility and all related improvements and shall restore all affected areas to a condition compliant with all applicable Laws, which includes without limitation the City's Municipal Code. The permittee, property owner and/or structure owner may request an extension up to 180 days to complete restoration after a wireless facility is abandoned or deemed abandoned, which the Director may grant for good cause shown. If the removal and restoration obligations under this condition are not complied with within the required period, the City shall have the right (but not the obligation) to perform such removal and restoration with or without notice, and the permittee, property owner and structure owner shall be jointly and severally liable for all costs and expenses incurred by the City in connection with such removal and/or restoration activities.
18. **Permittee's Contact Information.** Prior to final inspection and at all times relevant to this permit, the permittee shall keep on file with the Community Planning and Building Department basic contact and site information. This information shall include, at a minimum, the following:
  - a. the name, physical address, notice address (if different from physical address), direct telephone number and email address for (i) the permittee and, if different from the permittee, the (ii) property owner, (iii) structure owner, (iv) site operator, (v) equipment owner, (vi) site manager and (vii) agent for service of process;
  - b. the regulatory authorizations held by the permittee and, to the extent applicable, property owner, structure owner, site operator, equipment owner and site manager as may be necessary for the facility's continued operation;
  - c. the facility's site identification number and/or name used by the permittee and, to the extent applicable, property owner, structure owner, site operator, equipment owner and site manager; and
  - d. a toll-free telephone number to the facility's network operations center where a live

person with power-down control over the facility is available 24 hours-per-day, seven days-per-week.

Within 10 business days after a written request by the City, the permittee shall furnish the City with an update that includes all the most-current information described in this condition or any form provided by the City for such updates. Any notices from the City to the permittee shall be deemed given when delivered to the most current address(es) for the permittee on file with the City.

19. **Indemnification.** The permittee and, if applicable, owners (other than the City) of the property and the structure upon which the wireless facility is installed, shall defend, indemnify and hold harmless the City, City Council and the City's officers, public officials, employees and assigns (collectively, the "**City Indemnitees**") from any and all (a) damages, liabilities, injuries, losses, costs and expenses and from any and all claims, demands, law suits, writs and other actions or proceedings brought against any City Indemnitees to challenge, attack, seek to modify, set aside, void or annul the City's approval of this permit, and (b) other claims of any kind or form, whether for personal injury, death or property damage, that arise from or in connection with the permittee's or its agents', directors', officers', employees', contractors', subcontractors', licensees', or customers' acts or omissions in connection with this permit (collectively, "Claims"). If the City becomes aware of any Claims, the City will promptly notify the permittee and shall reasonably cooperate in the defense. The City may, in its sole discretion, participate in any such legal action, but participation shall not relieve the permittee of any obligation under this condition. Should any party bring any legal action in connection with this project, the Superior Court of the County of Monterey, California, shall be the situs and have jurisdiction for the resolution of all such actions. Such indemnification obligations will survive the expiration, revocation or other termination of this permit.
  
20. **Insurance.** The permittee shall obtain and maintain insurance policies as follows:
  - a. **Commercial General Liability Insurance.** Insurance Services Office Form CG 00 01 covering Commercial General Liability ("CGL") on an "occurrence" basis, with limits not less than \$2,000,000 per occurrence or \$4,000,000 in the aggregate. If a general aggregate limit applies, the general aggregate limit shall apply separately to this project/location. CGL insurance must include coverage for the following: Bodily Injury and Property Damage; Personal Injury/Advertising Injury; Premises/Operations Liability; Products/Completed Operations Liability; Aggregate Limits that Apply per Project; Explosion, Collapse and Underground ("UCX") exclusion deleted; Contractual Liability with respect to the permit; Broad Form Property Damage; and Independent Consultants Coverage. The policy shall contain no endorsements or provisions limiting coverage for (i) contractual liability; (ii) cross liability exclusion for claims or suits by one insured against another; (iii) products/completed operations liability; or (iv) contain any other exclusion contrary to the conditions in this permit.
  
  - b. **Automotive Insurance.** Insurance Services Office Form Number CA 00 01 covering, Code 1 (any auto), or if permittee has no owned autos, Code 8 (hired) and 9 (non-owned), with limit no less than \$1,000,000 per accident for bodily injury and property

damage.

- c. **Workers' Compensation Insurance.** The permittee shall certify that it is aware of the provisions of California Labor Code § 3700, which requires every employer to be insured against liability for workers' compensation or to undertake self-insurance in accordance with the provisions of that code, and further certifies that the permittee will comply with such provisions before commencing work under this permit. To the extent the permittee has employees at any time during the term of this permit, at all times during the performance of the work under this permit the permittee shall maintain insurance as required by the State of California, with Statutory Limits, and Employer's Liability Insurance with limit of no less than \$1,000,000 per accident for bodily injury or disease.
- d. **Professional Liability Insurance.** The permittee shall maintain Professional Liability (Errors and Omissions) Insurance appropriate to the permittee's profession, with limit no less than \$1,000,000 per occurrence or claim. This insurance shall be endorsed to include contractual liability applicable to this permit and shall be written on a policy form coverage specifically designed to protect against acts, errors or omissions of the permittee. "Covered Professional Services" as designed in the policy must specifically include work performed under this permit.
- e. **Claims-Made Policies.** If the permittee maintains any required insurance under a claims-made form, the permittee shall maintain such coverage continuously throughout the permit term and, without lapse, for at least three years after the permit term expires so that any claims that arise after the expiration in connection with events that occurred during the permit term are covered by such claims-made policies.
- f. **Umbrella or Excess Liability Policies.** If an umbrella or excess liability insurance policy is used to satisfy the minimum requirements for CGL or automotive insurance coverage listed above, the umbrella or excess liability policies shall provide coverage at least as broad as specified for the underlying coverages and covering those insured in the underlying policies. Coverage shall be "pay on behalf," with defense costs payable in addition to policy limits. Permittee shall provide a "follow form" endorsement or schedule of underlying coverage satisfactory to the City indicating that such coverage is subject to the same terms and conditions as the underlying liability policy.
- g. **Additional Insured; Separation of Insureds.** The relevant CGL and automotive insurance policies shall name the City, its elected/ appointed officials, commission members, officers, representatives, agents, volunteers and employees as additional insureds. The required insurance shall contain standard separation of insureds provisions, and shall contain no special limitations on the scope of its protection to the City, its elected/appointed officials, commission members, officers, representatives, agents, volunteers and employees.
- h. **Primary Insurance; Waiver of Subrogation.** The required insurance shall be primary with respect to any insurance programs covering the City, its elected/appointed officials, commission members, officers, representatives, agents, volunteers and employees. All policies for the required CGL, automotive and workers' compensation

insurance shall provide that the insurance company waives all right of recovery by way of subrogation against the City in connection with any damage or harm covered by such policies

- i. **Term; Cancellation Notice.** The permittee shall maintain the required insurance throughout the permit term and shall replace any certificate, policy, or endorsement which will expire prior to that date. The permittee shall use its best efforts to provide 30 calendar days' prior written notice to the City of the cancellation or material modification of any applicable insurance policy; provided, however, that in no event shall the permittee fail to provide written notice to the City within 10 calendar days after the cancellation or material modification of any applicable insurance policy. The permittee shall promptly take action to prevent cancellation or suspension, reinstate cancelled coverage or obtain coverage from a different qualified insurer.
  - j. **Certificates.** Before the City issues any permit, the permittee shall deliver to the Director insurance certificates and endorsements, in a form satisfactory to the Director, that evidence all the coverage required above. In addition, the permittee shall promptly deliver complete copies of all insurance policies and endorsements upon a written request by the Director.
  - k. **Insurer Rating.** Unless approved in writing by the City, all required insurance shall be placed with insurers authorized to do business in the State of California and with a current A.M. Best rating of at least A-:VIII.
21. **Removal Bond.** Prior to issuance of any building permits, the permittee shall post a bond issued by a surety and in an amount and a form acceptable to the City Attorney. The permittee must provide to the City at least one written estimate of removal and restoration costs from a qualified contractor with experience in wireless facilities or other infrastructure removal. The written estimate must cover the cost to remove all equipment and other improvements, including without limitation all antennas, radios, batteries, generators, utilities, cabinets, mounts, brackets, hardware, cables, wires, conduits, structures, shelters, towers, poles, footings and foundations, whether above ground or below ground, constructed or installed in connection with the wireless facility, plus the cost to completely restore any areas affected by the removal work to a standard compliant with applicable Laws. The bond shall be valid for the term of this permit plus the greater of one year or the time required to complete the removal and restoration in accordance with this condition. If at any time after construction the Director finds good cause to believe that the bond required in this condition no longer adequately covers the removal and restoration costs, the Director may require by written notice that the permittee provide an updated estimate and increase the bond amount to cover any increase.
22. **Record Retention.** Throughout the permit term, the permittee must maintain a complete and accurate copy of the written administrative record, which includes without limitation the permit application, permit, the approved plans and photo simulations incorporated into this approval, all conditions associated with this approval, any ministerial permits or approvals issued in connection with this approval and any records, memoranda, documents, papers and other correspondence entered into the public record in connection with the permit (collectively, "**Records**"). If the permittee does not maintain such Records as

required in this condition, any ambiguities or uncertainties that would be resolved by inspecting the missing Records will be construed against the permittee. The requirements in this condition shall not be construed to create any obligation on the City to create or prepare any Records not otherwise required to be created or prepared by other applicable Laws. Compliance with this condition shall not excuse the permittee from any other similar record-retention obligations under applicable Laws.

23. **Permit Revocation.** This permit may be revoked in accordance with the provisions and procedures in CMC Section 17.66.050.
24. **Truthful and Accurate Statements.** The permittee acknowledges that the City's approval relies on the written and/or oral statements by permittee and/or persons authorized to act on permittee's behalf. In any matter before the City in connection with the permit or the wireless facility, neither the permittee nor any person authorized to act on permittee's behalf shall, in any written or oral statement, intentionally provide material factual information that is incorrect or misleading or intentionally omit any material information necessary to prevent any material factual statement from being incorrect or misleading.
25. **Successors and Assigns.** The conditions terms contained in this permit will bind and inure to the benefit of the City and permittee and their respective successors and permitted assigns.
26. **Severable Conditions.** If any provision in these conditions or such provision's application to any person, entity or circumstances is or held by any court with competent jurisdiction to be invalid or unenforceable: (a) such provision or its application to such person, entity or circumstance will be deemed severed from this permit; (b) all other provisions in this permit or their application to any person, entity or circumstance will not be affected; and (c) all other provisions in this permit or their application to any person, entity or circumstance will be valid and enforceable to the fullest extent permitted by law.
27. **No Waiver.** No failure or omission by the City to timely notice or promptly enforce compliance with any permit condition shall be deemed to relieve, waive or lessen the permittee's obligation to comply in all respects with this permit.
28. **No Possessory Interest.** No possessory interest is created by this permit. However, to the extent that a possessory interest is deemed created by a governmental entity with taxation authority, permittee acknowledges that City has given to permittee notice pursuant to California Revenue and Taxation Code Section 107.6 that the use or occupancy of any public property pursuant to a permit may create a possessory interest which may be subject to the payment of property taxes levied upon such interest. Permittee shall be solely liable for, and shall pay and discharge prior to delinquency, any and all possessory interact taxes or other taxes, fees, and assessments levied against permittee's right to possession, occupancy, or use of any public property pursuant to any right of possession, occupancy, or use created by this permit.

**B. For Facilities in the Public Right-of-Way, the following additional conditions apply.**

1. **Future Undergrounding Programs.** During the term of the permit, if other public utilities are

required to underground their facilities in the segment of the public rights-of-way where the permittee's wireless facility is located, the permittee must also underground its wireless facility, except for any components of the facility that are exempted under the applicable undergrounding program. Such undergrounding shall occur at the permittee's sole cost and expense, except as may be reimbursed through tariffs approved by the California Public Utilities Commission for undergrounding costs or other available funding mechanisms.

2. **Electric Meter Upgrades.** If the wireless facility includes a separate or ground-mounted electric meter pedestal and the commercial electric utility provider adopts or changes its rules obviating the need for a separate or ground-mounted electric meter and enclosure, the permittee, on its own initiative and at no cost to City, shall arrange for removal of the separate or ground-mounted electric meter and enclosure. Prior to removing the electric meter, the permittee shall obtain any required encroachment and/or other ministerial permit(s). Upon removal, the permittee shall restore the affected area to its original condition that existed prior to installation of the equipment.
3. **Rearrangement and Relocation.** The permittee acknowledges that the City, in its sole discretion and at any time, may (a) change any street grade, width, or location; (b) add, remove, or otherwise change any improvements in, on, under, or along any street owned by the City or any other public agency, which includes, without limitation, any sewers, storm drains, conduits, pipes, vaults, boxes, cabinets, poles, and utility systems for gas, water, electric, or telecommunications; and/or (c) perform any other work deemed necessary, useful, or desirable by the City (collectively, "City work"). The City reserves the rights to do any and all City work without any admission on its part that the City would not have such rights without the express reservation in this permit. If the Director determines that any City work will require the permittee's wireless facility located in the public rights-of-way to be rearranged and/or relocated, the permittee shall, at its sole cost and expense, do or cause to be done all things necessary to accomplish such rearrangement and/or relocation. If the permittee fails or refuses to either permanently or temporarily rearrange and/or relocate the permittee's wireless facility within a reasonable time after the Director's notice, the City may (but will not be obligated to) cause the rearrangement or relocation to be performed at the permittee's sole cost and expense. The City may exercise its rights to rearrange or relocate the permittee's wireless facility without prior notice to permittee when the Director determines that City work is immediately necessary to protect public health or safety. The permittee shall reimburse the City for all costs and expenses in connection with such work within 10 business days after a written demand for reimbursement and reasonable documentation to support such costs.

C. **Additional special conditions.**

1. **Paint.** Prior to building permit issuance, the applicant shall provide manufacturer's specifications for the paint for all equipment associated with the wireless facility. The paint shall be matte, non-reflective, and match the color of the PG&E utility pole.
2. **Replacement Utility Pole and Other Permits.** The permittee acknowledges that this permit only authorizes the installation of the Small Wireless Facility on a PG&E replacement utility pole. Construction of the Small Wireless Facility by permittee is conditioned on PG&E



**CITY OF CARMEL-BY-THE-SEA  
PLANNING COMMISSION**

**PLANNING COMMISSION RESOLUTION NO. 2026-XXX-PC**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARMEL-BY-THE-SEA FINDING THAT THE DENIAL OF THE PROJECT STATUTORIALLY EXEMPT FROM CEQA PURSUANT TO CEQA GUIDELINES SECTION 15270(a); AND DENYING A USE PERMIT, DESIGN REVIEW, AND COASTAL DEVELOPMENT PERMIT FOR THE CONSTRUCTION OF A NEW SMALL WIRELESS FACILITY ON A REPLACEMENT PG&E UTILITY POLE. THE PROPERTY IS LOCATED IN THE PUBLIC RIGHT-OF-WAY IN FRONT OF CARMELO STREET 4 SOUTHEAST OF 10<sup>TH</sup> AVENUE IN THE SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT.**

WHEREAS, Sequoia Deployment Services, Inc., on behalf of Verizon Wireless (“Applicant”), submitted an application requesting approval of a Use Permit, Design Review, and Coastal Development Permit application (“DR 25313 & UP 25314 [Verizon Sequoia Deployment]”) described herein (“Application”); and

WHEREAS, the applicant is proposing to construct a Small Wireless Facility on a replacement PG&E utility pole in the public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue in the Single-Family Residential (R-1) District; and

WHEREAS, installation of Small Wireless Facilities on replacement poles requires approval of a Type III Conditional Use Permit application, including Design Review, and a Coastal Development permit by the Planning Commission (Carmel-by-the-Sea Municipal Code [CMC] Section 17.46.050.A.1.c); and,

WHEREAS, on January 9, 2026, a notice of public hearing was published in the Carmel Pine Cone for the January 21, 2026, Planning Commission meeting in compliance with State law (California Government Code 65091) and mailed to owners of real property within a 500-foot radius of the project indicating the date and time of the public hearing; and

WHEREAS, on or before January 11, 2026, the Applicant posted the public notice on the project site and hand-delivered a copy of the public notice to each property within a 100-foot radius of the project site indicating the date and time of the public hearing; and

WHEREAS, on or before January 16, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on January 21, 2026, the Planning Commission held a public hearing to receive public testimony regarding the Application, including without limitation, information provided to the Planning Commission by City staff and through public testimony on the project; and

WHEREAS, on January 21, 2026, the Planning Commission continued the hearing on the project to a date certain to February 4, 2026, due to the volume of correspondence that the city received within 24 hours of the meeting; and

WHEREAS, on or before January 25, 2026, the Applicant posted the public notice on the project site and hand-delivered a copy of the public notice to each property within a 100-foot radius of the project site indicating the date and time of the public hearing; and

WHEREAS, on or before January 30, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on February 4, 2026, the Planning Commission continued the hearing on the project to a date certain to February 10, 2026, due to staff's need for additional time to review continued correspondence from the public and the applicant; and

WHEREAS, on January 30, PierCon submitted Supplemental Report #2 which included the following language: "Additional best-server modeling was performed to assess whether the site [Golden Bough Theater] could be made viable under more aggressive and constrained design parameters. The only configuration that produced marginally acceptable modeled results required" antenna heights at roughly 37' (antenna centerline of 34'), azimuths of 220 and 330, and narrow beamwidth antenna. Although the report concludes that further analysis (field test data) is required to identify whether or not the existing trees in proximity would impact the viability of the facility, the fact that there is an identified potential alternative site, there is a rebuttal presumption that there is a viable alternative location; and

WHEREAS, on or before February 6, 2026, the meeting agenda was posted in three locations in compliance with State law, indicating the date and time of the public hearing; and

WHEREAS, on February 10, 2026, the Planning Commission held a public hearing to receive public testimony regarding the Application, including without limitation, information provided to the Planning Commission by City staff and through public testimony on the project; and

WHEREAS, this Resolution and its findings are made based upon the evidence presented to the Commission at the hearing date, including, without limitation, the staff report and attachments submitted by the Community Planning and Building Department; and

WHEREAS, the Planning Commission did hear and consider all said reports, recommendations, and testimony herein above set forth and used their independent judgment to evaluate the project; and

WHEREAS, the California Environmental Quality Act (California Public Resources Code §§ 21000, *et seq.*, "CEQA"), together with State Guidelines (14 California Code Regulations §§ 15000, *et seq.*, the "CEQA Guidelines") and City Environmental Regulations (CMC Chapter 17.60) require that certain projects be reviewed for environmental impacts and that environmental documents be prepared; and

WHEREAS, the Planning Commission finds that pursuant to CEQA regulations, the Application is *Statutorily Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15270(a) of the CEQA Guidelines (Projects Which Are Disapproved) which states that CEQA does not apply to projects which a public agency rejects or disapproves*; and

WHEREAS, the facts set forth in the recitals are true and correct and are incorporated herein by reference.

**NOW THEREFORE, BE IT RESOLVED**, that the Planning Commission of the City of Carmel-By-The-Sea does hereby make the following findings and determinations:

**Section 1: FINDINGS REQUIRED FOR USE PERMIT APPROVAL (CMC Chapter 17.64), DESIGN REVIEW AND COASTAL DEVELOPMENT PERMIT.** For each of the required findings listed below, staff has indicated

whether the submitted plans support the adoption of the findings. For all findings checked "no" the staff report discusses the issues to facilitate the Planning Commission's decision-making. Findings checked "yes" may or may not be discussed in the report depending on the issues.

<b>Municipal Code Findings – CMC Section 17.64.010 General Findings Required for All Use Permits</b>	<b>YES</b>	<b>NO</b>
1. The proposed use will not conflict with the City's General Plan.	✓	
2. That the proposed use will comply with all zoning standards applicable to the use and zoning district.		✓
3. That granting the use permit will not set a precedent for the approval of similar uses whose incremental effect will be detrimental to the City or will be in conflict with the General Plan.	✓	
4. That the proposed use will not make excessive demands on the provision of public services, including water supply, sewer capacity, energy supply, communication facilities, police protection, and fire protection	✓	
5. That the proposed use will not be injurious to public health, safety, or welfare.	✓	
6. That the proposed use will be compatible with surrounding land uses and will not conflict with the purpose established for the district within which it will be located.	✓	
7. That the proposed use will not generate adverse impacts affecting the health, safety, or welfare of neighboring properties or uses.	✓	
<b>Municipal Code Findings – CMC Section 17.46.080.A Findings Required for Type 1 to IV Applications</b>		
1. The proposed wireless facility will not result in adverse visual impacts or have an adverse impact on property values because it complies with all applicable development standards in CMC § <a href="#">17.46.040</a> and the Administrative Detailed Wireless Facility Design Guidelines.	✓	
2. If applicable, to the extent the proposed wireless facility does not comply with all applicable development standards in CMC § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines, the applicant has requested a special exception and the findings for granting a special exception pursuant to subsection (C) of this section can be made.		✓
3. The proposed wireless facility will comply with all applicable FCC regulations and guidelines for human exposure to RF emissions and will not, either individually or cumulatively with other transmitters in the vicinity, result in RF exposures that exceed the FCC's maximum permissible exposure level for the general population.	✓	
4. The proposed wireless facility will comply with all applicable fire safety and public safety standards.	✓	
5. The proposed wireless facility will comply with fall zone requirements in the Administrative Detailed Wireless Facility Design Guidelines.	✓	
6. All public notices required for the application have been given.	✓	
7. All the findings required for a use permit pursuant to CMC § <a href="#">17.64.010</a> .	✓	
8. All the findings for discretionary design review approval pursuant to CMC § <a href="#">17.58.060</a>	✓	
<ul style="list-style-type: none"> <li>• Conform to the applicable policies of the General Plan and the Local Coastal Program</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Comply with all applicable provisions of this code</li> </ul>		✓
<ul style="list-style-type: none"> <li>• Are consistent with applicable adopted design review guidelines</li> </ul>	✓	
9. If applicable, all the findings required for a coastal development permit.	✓	

<ul style="list-style-type: none"> <li>The project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified City of Carmel-by-the-Sea Local Coastal Program.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>If the project is located between the first public road and the sea, the project conforms with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Sections 30200 of the Public Resources Code).</li> </ul>	✓	
<b>Municipal Code Findings – CMC Section 17.46.080.C Special Exceptions for Federal or State Preemption or Minor Deviations in Design (Types I to IV Only)</b>		
1. The applicant has shown that denial of an application will result in an effective prohibition or otherwise violate Federal law; or the applicant has shown that denial of an application will violate State law; or the applicant has shown that it is a minor deviation that achieves all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines.		✓
2. The special exception requested by the applicant does not compromise or excuse compliance with any fire safety or other public health and safety requirements.	✓	
3. The special exception is narrowly tailored such that any deviation from the requirements of this chapter is only to extent necessary for compliance with Federal or State law or to achieve all of the applicable design objectives of this chapter, as well as, or better than, would be achieved by adherence to the adopted design guidelines.	✓	

**Section 2: REASONS FOR DENIAL. [PLANNING COMMISSION MUST EXPLAIN ITS REASONS FOR DENIAL. INDICATING WHICH FINDING(S) FOR APPROVAL CANNOT BE MADE AND THE REASONS SUCH FINDING(S) CANNOT BE MADE. For example, the Applicant has failed to meet its burden for granting the special exceptions requested. The Applicant has failed to show that denial of the Application would result in an effective prohibition of service under the significant gap/least intrusive means test because \_\_\_\_\_ The Applicant has failed under the materially inhibits standard because \_\_\_\_\_. Further, the Applicant has not shown that denial would violate state law because\_\_\_\_\_.**

**Section 3: CEQA FINDINGS.** The Planning Commission of the City of Carmel-by-the-Sea does hereby FIND the project is Statutorily Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15270(a) of the CEQA Guidelines (Projects Which Are Disapproved) which states that CEQA does not apply to projects which a public agency rejects or disapproves.

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

**PASSED AND ADOPTED BY THE PLANNING COMMISSION OF THE CITY OF CARMEL-BY-THE-SEA this 10th day of February 2026, by the following vote:**

AYES:

NOES:

ABSENT:

ABSTAIN:

APPROVED:

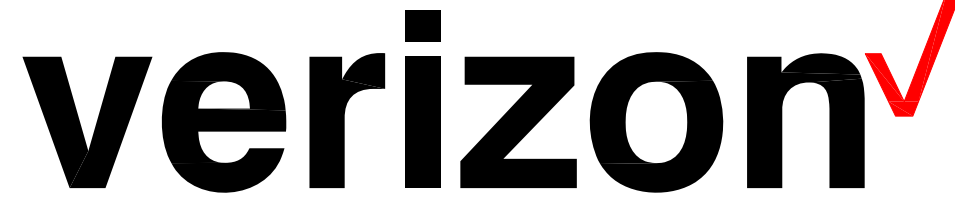
ATTEST:

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Michael LePage  
Chair

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Shelby Gorman  
Planning Commission Secretary

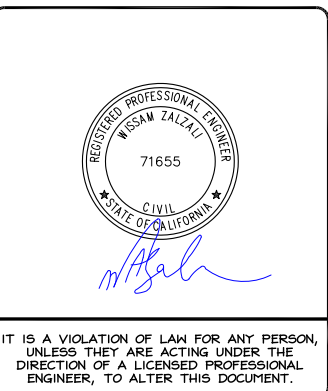


**SITE ID:** SC001 CARMELO STONEWALL (OPT.2)  
**POLYGON NAME:** CC SOUTH CARMEL  
**MDG NUMBER:** 5000081318  
**ADJACENT APN:** 010-275-012-000  
**SITE ADDRESS:** ROW ADJACENT TO IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE, CARMELO-BY-THE-SEA, CA 93921  
**COUNTY:** MONTEREY  
**SITE TYPE:** WOOD UTILITY POLE  
**POLE OWNER:** PG&E / AT&T  
**POLE ID:** TBD  
**CROSS STREETS (CURB ID):** E'LY SHOULDER OF CARMELO STREET (MID-BLOCK BTWN. 10TH AVE & 11TH AVE)  
**FUZE PROJECT ID:** 16908094



**PROJECT ID:** TBD  
**DRAWN BY:** MA  
**CHECKED BY:** DW

REV	DATE	DESCRIPTION	
Δ	10/30/2025	100% CD (PGC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC



SC001 CARMELO STONEWALL (OPT.2)  
**PUBLIC R.O.W. ADJACENT TO:**  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

**SHEET TITLE**  
 TITLE SHEET

**SHEET NUMBER**  
 T-1

**PROJECT DESCRIPTION**

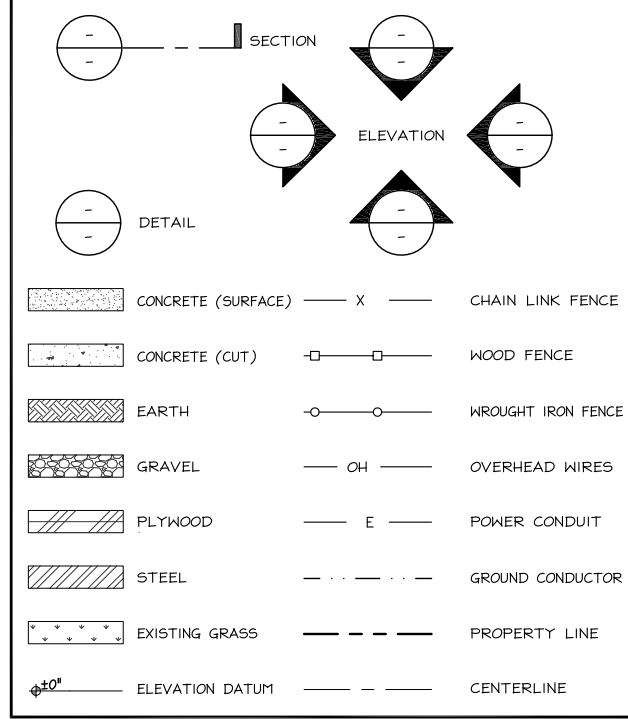
THIS IS AN UNMANNED TELECOMMUNICATIONS FACILITY FOR THE VERIZON WIRELESS NETWORK CONSISTING OF THE INSTALLATION AND OPERATION OF AN ANTENNA AND ASSOCIATED EQUIPMENT IN THE PUBLIC RIGHT-OF-WAY ON A REPLACEMENT WOOD UTILITY POLE, REPLACED BY PG&E.

**SCOPE OF WORK**

- INSTALL NEW TELECOMMUNICATIONS EQUIPMENT ON A REPLACEMENT ±55' CL-1 WOOD UTILITY POLE, REPLACED BY PG&E.
- EQUIPMENT CONSISTS OF (1) JMA CX200M1236 ANTENNA AT POLE TOP AND (1) DISCONNECT, (1) 8863 RADIO, (1) 4890 RADIO, (1) 6308 POWER SUPPLY, (1) FIBER BOX, (1) DIPLEXER AND (1) GROUND BAR, WITHIN (1) EQUIPMENT SHROUD HOUSING.
- RELOCATE EXISTING AT&T AND COMCAST AERIAL CABLES TO NEW F-ARM ON UTILITY POLE

**SYMBOLS/ABBREVIATIONS LEGEND**

ADD'L	ADDITIONAL	L.	LONG(ITUDINAL)
A.F.G.	ABOVE FINISHED GRADE	MAX.	MAXIMUM
ANT.	ANTENNA	MFR.	MANUFACTURER
ASS'Y.	ASSEMBLY	MIN.	MINIMUM
AWG.	AMERICAN WIRE GAUGE	(N)	NEW
BLDG.	BUILDING	NTS	NOT TO SCALE
BTCW.	BARE TINNED COPPER WIRE	O.C.	ON CENTER
CLR.	CLEAR	P.T.	PRESSURE TREATED
CONC.	CONCRETE	RAD.(R)	RADIUS
CONN.	CONNECTION(OR)	REQ'D	REQUIRED
CONST.	CONSTRUCTION	RGS.	RIGID GALVANIZED STEEL
CONT.	CONTINUOUS	SCH.	SCHEDULE
DBL.	DOUBLE	SIM.	SIMILAR
D.F.	DOUGLAS FIR	SQ.	SQUARE
DIA.	DIAMETER	S.S.	STAINLESS STEEL
DIM.	DIMENSION	STD.	STANDARD
EA.	EACH	TEMP.	TEMPORARY
ELEV.	ELEVATION	THK.	THICK(NESS)
EMT.	ELECTRICAL METALLIC TUBING	TYP.	TYPICAL
(E)	EXISTING	U.G.	UNDER GROUND
F.G.	FINISH GRADE	U.L.	UNDERWRITERS LABORATORY
FT.(')	FOOT (FEET)	U.N.O.	UNLESS NOTED OTHERWISE
GA.	GAUGE	V.I.F.	VERIFY IN FIELD
HT.	HEIGHT	W	WIDE (WIDTH)
IN.(#)	INCH(ES)	w/	WITH
LB.(#)	POUND(S)	WD.	WOOD
L.F.	LINEAR FEET (FOOT)	W.P.	WEATHERPROOF



**PROJECT TEAM**

**APPLICANT:**  
 VERIZON WIRELESS  
 2770 SHADELANDS DR.  
 BUILDING 11  
 WALNUT CREEK, CA 94594

**POLE OWNER:**  
 PG&E / AT&T

**ZONING CONTACT:**  
 SEQUOIA DEPLOYMENT SERVICES, INC  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630  
 CONTACT: MICHAEL NAZAROFF  
 PHONE: (562) 237-6380  
 EMAIL: michael.nazaroff@sequoia-ds.com

**RF ENGINEER:**  
 VERIZON WIRELESS  
 2770 SHADELANDS DR. BLDG 11  
 WALNUT CREEK, CA 94594  
 CONTACT: DEWAYNE BONHAM  
 PHONE: (559) 974-7012  
 EMAIL: dewayne.bonham@verizonwireless.com

**A&E PROJECT MANAGER:**  
 ZALZALI & ASSOCIATES INC.  
 dba ALL STATES ENGINEERING & SURVEYING  
 23675 BIRTCHE DRIVE  
 LAKE FOREST, CA 92630  
 PM: DEAN WALKER  
 PHONE: (714) 230-5714  
 EMAIL: dean@zalzali.com

**CONSTRUCTION MANAGER:**  
 SEQUOIA DEPLOYMENT SERVICES, INC  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630  
 CONTACT: PETE SHUBIN  
 PHONE: (714) 478-3197  
 EMAIL: pete.shubin@sequoia-ds.com

**LEASING CONTACT:**  
 SEQUOIA DEPLOYMENT SERVICES, INC  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630  
 CONTACT: CHELSEA MANUTO  
 PHONE: (760) 445-1985  
 EMAIL: chelsea.manuto@sequoia-ds.com

**DRAWING INDEX**

SHEET NO:	SHEET TITLE
T-1	TITLE SHEET
C-1	SITE SURVEY
(A-0)	SITE PLAN Δ
A-1	(PROPOSED) SITE PLAN
A-2	ENLARGED SITE PLAN
A-3	ELEVATIONS
A-4	ELEVATIONS
A-5	POLE-MOUNTED EQUIPMENT LAYOUT & ELEVATIONS
D-1	EQUIPMENT DETAILS
D-2	EQUIPMENT DETAILS
D-3	EQUIPMENT DETAILS
E-1	ELECTRICAL & GROUNDING DIAGRAMS, NOTES
TC-1	TRAFFIC CONTROL PLAN
TC-2	TRAFFIC CONTROL NOTES & SIGNS

**SITE INFORMATION**

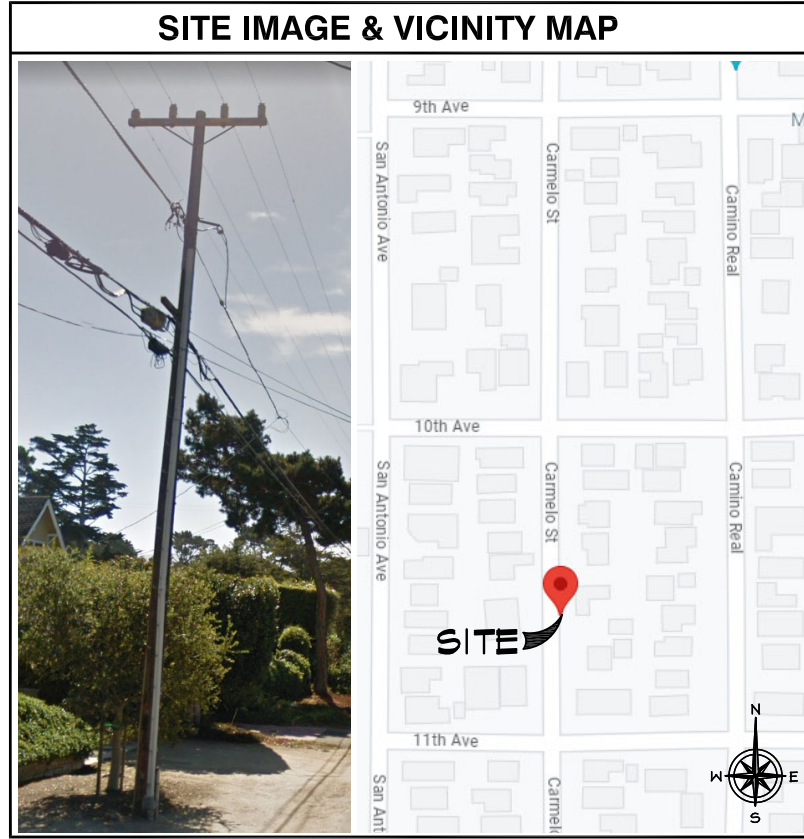
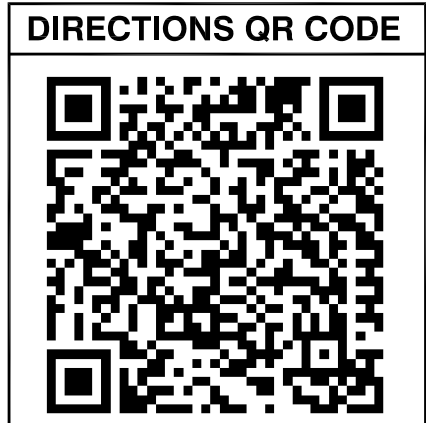
**LATITUDE:** 36° 32' 57.58" N (36.549328)  
**LONGITUDE:** 121° 55' 36.86" W (-121.926906)  
**ELEVATION:** 80.22' AMSL  
**ZONING:** R-1  
**LAND USE:** TBD

**JURISDICTION:** CITY OF CARMELO BY THE SEA  
**ADJACENT APN:** 010-275-012-000  
**PROPERTY LEGAL DESCRIPTION:** N/A - PUBLIC RIGHT OF WAY  
**ADA COMPLIANCE:** N/A  
**OCCUPANCY CLASSIFICATION:** N/A

**CODE COMPLIANCE**

CONSTRUCTION WORKS AND MATERIALS MUST COMPLY WITH ALL APPLICABLE NATIONAL, STATE, AND LOCAL CODES AS ADOPTED BY LOCAL JURISDICTION, INCLUDING BUT NOT LIMITED TO:

- CALIFORNIA CODE OF REGULATIONS
- 2022 CALIFORNIA BUILDING CODE
- 2022 CALIFORNIA ELECTRIC CODE
- CALIFORNIA EXISTING BUILDING CODE,
- CALIFORNIA HISTORICAL BUILDING CODE,
- CALIFORNIA RESIDENTIAL CODE
- CALIFORNIA GREEN BUILDING CODE
- 2022 EDITION OF TITLE 24 ENERGY STANDARDS
- ANY LOCAL BUILDING CODE AMENDMENTS TO THE ABOVE
- CITY / COUNTY ORDINANCES
- GO 95 / GO 128



**SITE COMPLETION CHECKLIST**

SIGNAGE: FCC MANDATED RF WARNING SIGNAGE SHALL FACE OUT TO STREET AND IN CLIMBING SPACE PER VZW REQUIREMENTS.

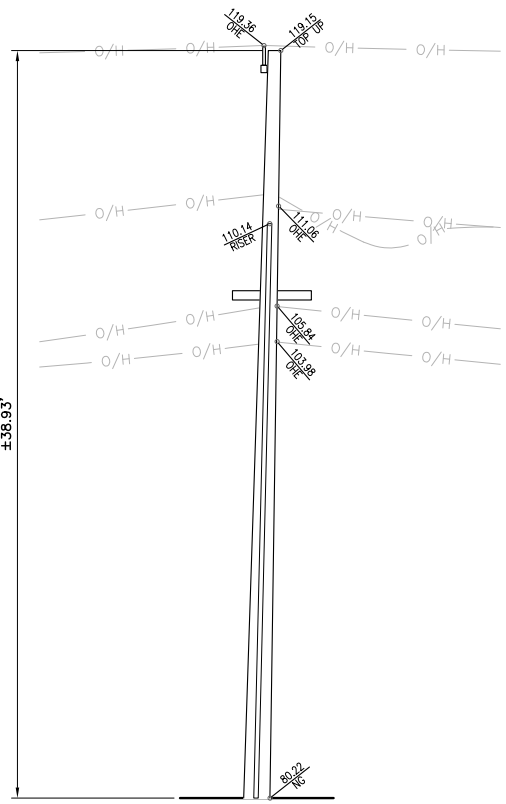
**ADMINISTRATIVE REQUIREMENTS**

CONTRACTOR SHALL VERIFY ALL PLANS & (E) DIMENSIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME IF USING 11"X17" PLOT, DRAWINGS WILL BE HALF SCALE.

**DO NOT SCALE DRAWINGS**

SUBCONTRACTOR SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS & FIELD CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.





**LEGEND**

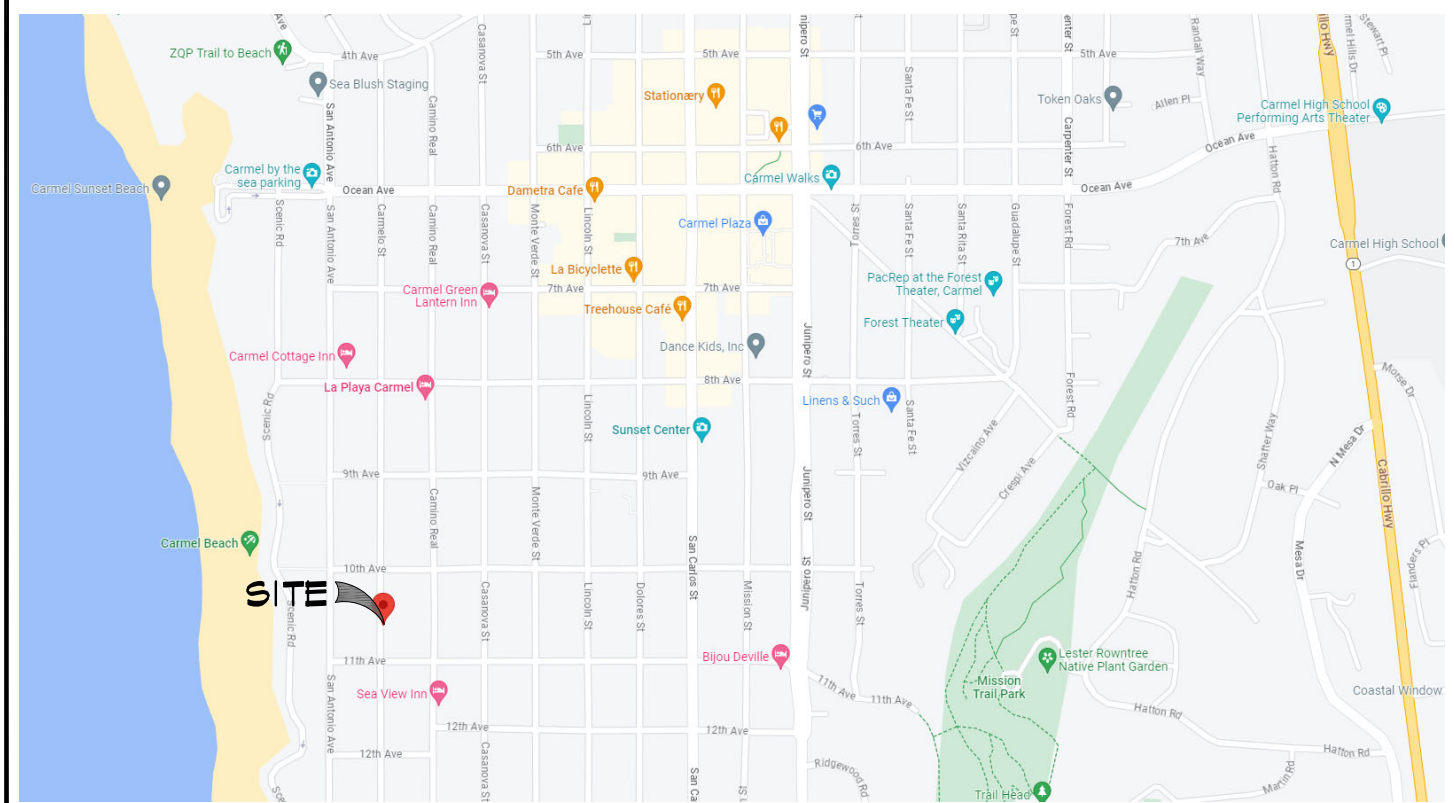
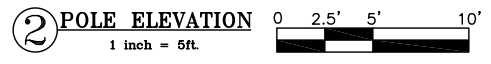
□	U.G. UTILITY VAULT	BLDG	TOP OF BUILDING
⊕	MANHOLE	MON	MONUMENT
○	UTILITY POLE	FL	FLOW LINE
⊙	SPOT ELEVATION	EOP	EDGE OF PAVEMENT
⊕	WATER VALVE	R.O.W.	RIGHT OF WAY
⊙	FOUND MONUMENT	R/W	RIGHT OF WAY
⊕	GEODETTIC MARKER	SCO	SEWER CLEAN-OUT
- x -	CHAIN LINK FENCE	PS	PARKING STRIPE
□	WOOD FENCE	SW	SIDEWALK
- o/h -	OVERHEAD LINE	VLT	U.G. UTILITY VAULT
○	METAL FENCE	OHE	OVERHEAD ELECTRICAL
- - -	GRADE BREAK	SVC	SERVICE
- - - -	RIGHT OF WAY LINE	AC	ASPHALTIC CONCRETE
- - - -	CENTER LINE	AP	ASPHALT PAVING
- - - -	EASEMENT LINE	CONC	CONCRETE
▬	MASONRY WALL	PED	PEDESTAL
WP	WOOD POLE	OH	OVERHEAD
UP	UTILITY POLE	PUE	PUBLIC UTILITY EASEMENT
LP	LIGHT POLE	FC	FACE OF CURB
LUM	LUMINAIRE	BOL	BOLLARD
NG	NATURAL GRADE	TOP	TOP OF ITEM
		BOT	BOTTOM OF ITEM

**TITLE REPORT**  
NOT APPLICABLE (RIGHT-OF-WAY)

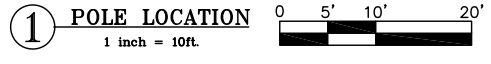
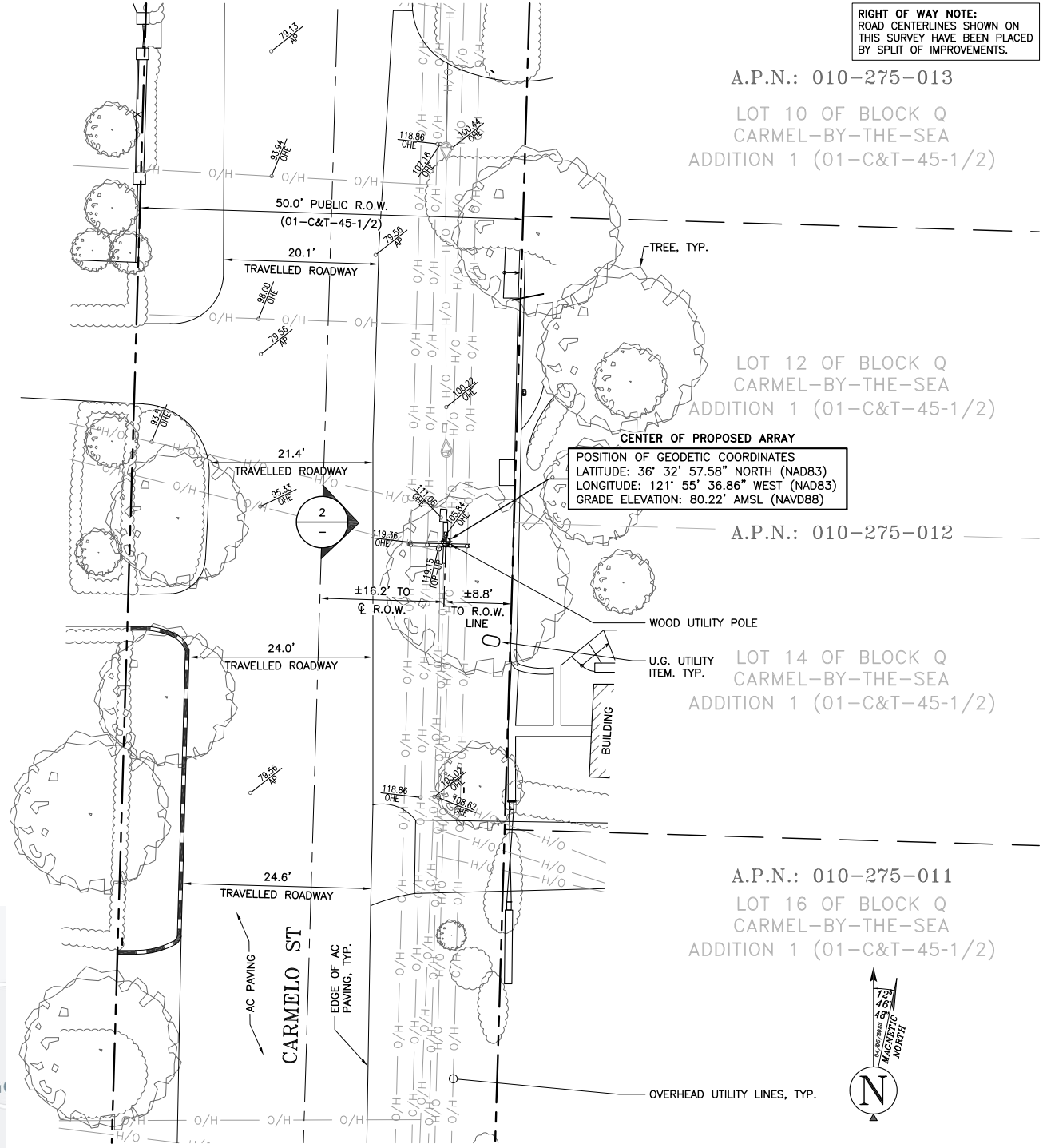
**LEGAL DESCRIPTION**  
NOT APPLICABLE (RIGHT-OF-WAY)

**ASSESSOR'S PARCEL NO.**  
NOT APPLICABLE (RIGHT-OF-WAY)

**UTILITY NOTE:**  
SURVEYOR DOES NOT GUARANTEE THAT ALL UTILITIES ARE SHOWN OR THEIR LOCATIONS ARE DEFINITE. IT IS THE RESPONSIBILITY OF THE CONTRACTOR AND DEVELOPER TO CONTACT BLUE STAKE AND ANY OTHER INVOLVED AGENCIES TO LOCATE ALL UTILITIES PRIOR TO CONSTRUCTION. REMOVAL, RELOCATION AND/OR REPLACEMENT IS THE RESPONSIBILITY OF THE CONTRACTOR.



**VICINITY MAP**



**NOTES:**

- THIS IS NOT A BOUNDARY SURVEY. THIS IS A SPECIALIZED RIGHT OF WAY MAP. THE PROPERTY LINES AND EASEMENTS SHOWN HEREON ARE FROM RECORD INFORMATION AS NOTED HEREON. ALL STATES ENGINEERING & SURVEYING/ZALZALI & ASSOCIATES, INC. TRANSLATED THE TOPOGRAPHIC SURVEY TO RECORD INFORMATION USING MONUMENT(S)/LANDMARK(S) SHOWN HEREON. NO TITLE RESEARCH WAS PERFORMED BY ALL STATES ENGINEERING & SURVEYING/ZALZALI & ASSOCIATES, INC.
- ANY CHANGES MADE TO THE INFORMATION ON THIS PLAN, WITHOUT THE WRITTEN CONSENT OF ALL STATES ENGINEERING & SURVEYING / ZALZALI & ASSOCIATES, INC. RELIEVES ALL STATES ENGINEERING & SURVEYING/ ZALZALI & ASSOCIATES, INC. OF ANY AND ALL LIABILITY.
- THESE DRAWINGS & SPECIFICATIONS ARE THE PROPERTY & COPYRIGHT OF ALL STATES ENGINEERING & SURVEYING / ZALZALI & ASSOCIATES, INC. & SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH THE SURVEYOR. WRITTEN DIMENSIONS SHALL TAKE PREFERENCE OVER SCALED & SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF THE SURVEYOR PRIOR TO COMMENCEMENT OF ANY WORK.
- THIS SITE IS PROPOSED TO BE DEVELOPED ON A WOOD UTILITY POLE LOCATED ON SHOULDER OF A ROADWAY WITHIN THE 50-FOOT-WIDE PUBLIC RIGHT OF WAY (CARMELO STREET), IN THE CITY OF CARMEL-BY-THE-SEA, COUNTY OF MONTEREY, STATE OF CALIFORNIA.

**SURVEY DATE**  
04/05/2023

**BASIS OF BEARING**  
BEARINGS SHOWN HEREON ARE BASED UPON U.S. STATE PLANE NAD83 COORDINATE SYSTEM CALIFORNIA STATE PLANE COORDINATE ZONE FOUR, DETERMINED BY GPS OBSERVATIONS.

**BENCHMARK**  
RTCM-REF 3213  
NORTHING: 2106278.840 FTUS  
EASTING: 5733722.350 FTUS  
+282.81' (A.M.S.L.)

**REFERENCE MAPS**

- 1-C&T-45-1/2
- J-MISC-250



PROJECT NO: SOUTH CARMEL OPTION 2  
DRAWN BY: NC  
CHECKED BY: JRT/WZ/DW

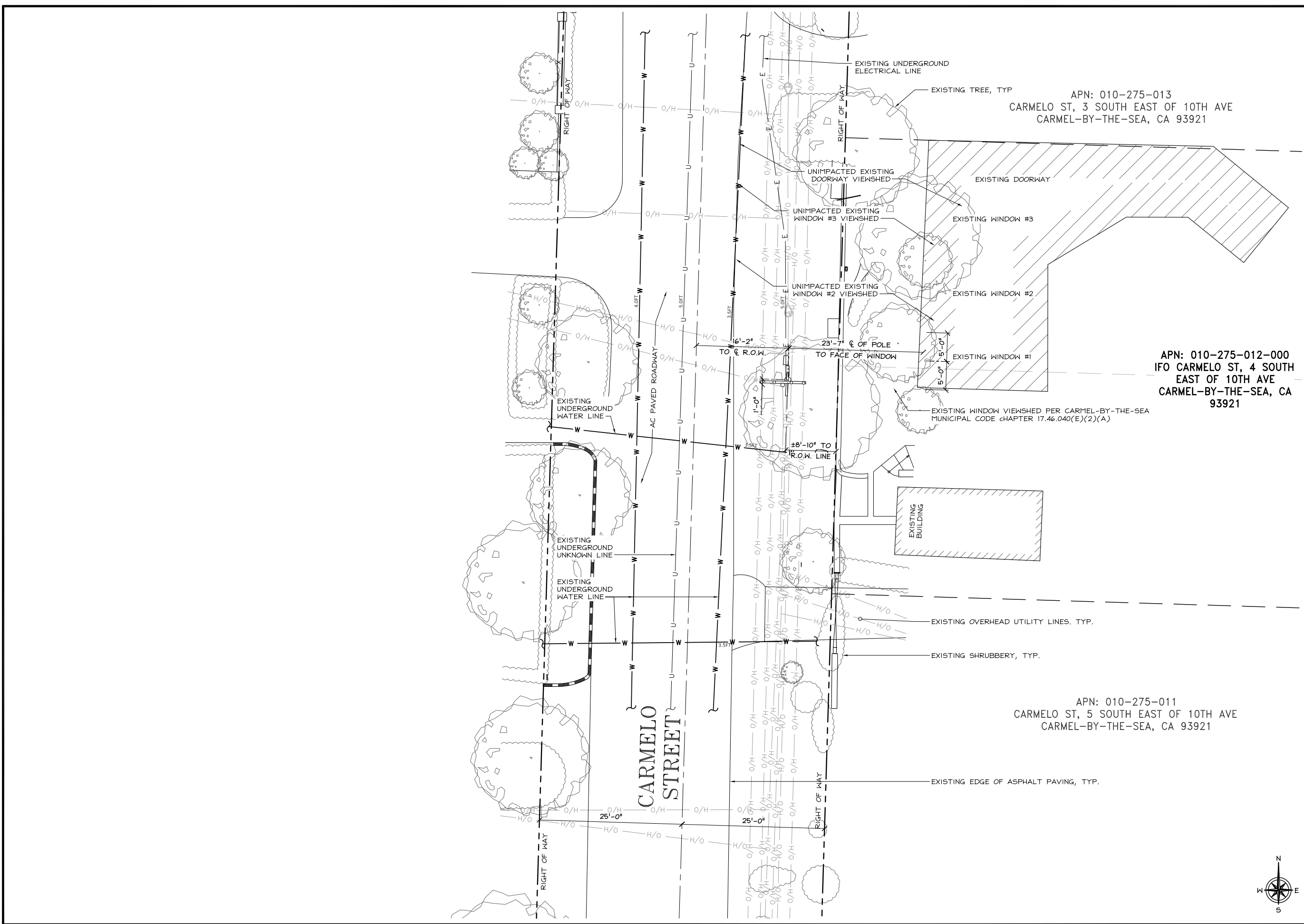
REV	DATE	DESCRIPTION	BY
0	04/19/2023	FINAL SURVEY (ROW)	NC
A	04/07/2023	PRELIMINARY SURVEY	NC

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

**SOUTH CARMEL OPTION 2  
RIGHT-OF-WAY SITE:  
CARMELO STREET  
CARMEL-BY-THE-SEA, CA 93921  
NEW BUILD-SMALL CELL**

SHEET TITLE  
**SITE SURVEY**

SHEET NUMBER  
**C-1**



APN: 010-275-013  
 CARMELO ST, 3 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

APN: 010-275-012-000  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

APN: 010-275-011  
 CARMELO ST, 5 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

**verizon**  
 2770 SHADELANDS DR. BUILDING 11  
 WALNUT CREEK, CA 94591

**SEQUOIA**  
 DEPLOYMENT SERVICES, INC.  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630-2283

**ALLSTATES**  
 ENGINEERING & SURVEYING  
 23675 BIRTCHE DRIVE  
 LAKE FOREST, CA 92630

PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
Δ	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC

REGISTERED PROFESSIONAL ENGINEER  
 WISSAM ZALZALI  
 71655  
 CIVIL  
 STATE OF CALIFORNIA

*W. Zalzali*

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

SC001 CARMELO STONEWALL (OPT.2)  
**PUBLIC R.O.W. ADJACENT TO:**  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

SHEET TITLE  
**SITE PLAN**

SHEET NUMBER  
**A-0**

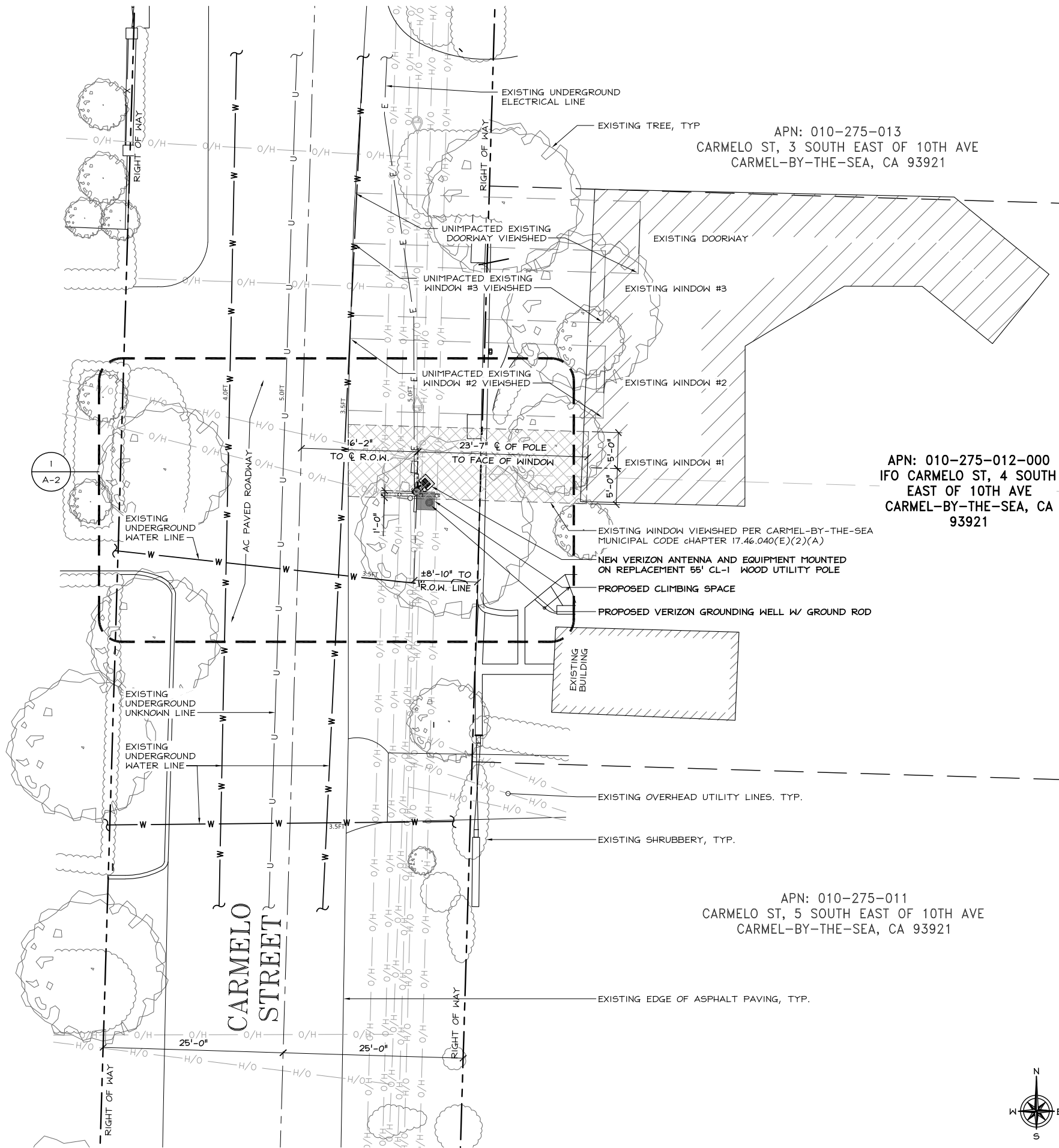
**SITE PLAN**

24"x36" SCALE: 1/8" = 1'-0"  
 11"x17" SCALE: 1/16" = 1'-0"  
 8' 6' 4' 2' 0" 8' 1



**NOTES:**

1. ANY CONSTRUCTION WITHIN THE CITY PUBLIC ROAD RIGHT-OF-WAY SHALL HAVE AN APPROVED PERMIT FOR CONSTRUCTION IN THE PUBLIC STREET PRIOR TO COMMENCEMENT OF THIS WORK.
2. THE CONTRACTOR MAY BE REQUIRED TO SUBMIT A LOGISTICS PLAN TO THE PUBLIC WORKS DEPARTMENT PRIOR TO COMMENCING WORK THAT ADDRESSES ALL IMPACTS TO THE CITY AND/OR COUNTY RIGHT-OF-WAY, INCLUDING, BUT NOT LIMITED TO: PEDESTRIAN CONTROL, TRAFFIC CONTROL, TRUCK ROUTES, MATERIAL DELIVERIES, CONTRACTOR'S PARKING, CONCRETE POURS, CRANE LIFTS, WORK HOURS, NOISE CONTROL, DUST CONTROL, STORM WATER POLLUTION PREVENTION, CONTRACTOR'S CONTACT, NOTICING OF AFFECTED SURROUNDING PROPERTIES, AND SCHEDULE OF WORK. THE REQUIREMENT TO SUBMIT A LOGISTICS PLAN WILL BE DEPENDENT ON THE NUMBER OF APPLICATIONS PUBLIC WORKS ENGINEERING RECEIVES WITHIN CLOSE PROXIMITY TO HELP MITIGATE AND CONTROL THE IMPACT TO THE PUBLIC-RIGHT-OF-WAY. IF NECESSARY, PUBLIC WORKS MAY REQUIRE A LOGISTICS PLAN DURING CONSTRUCTION.
3. PRESENTED FOR CONSIDERATION IS A POLE-ONLY EQUIPMENT CONFIGURATION WITH NO GROUND EQUIPMENT PROPOSED AS A PART OF THE BUILD.



APN: 010-275-013  
 CARMELO ST, 3 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

APN: 010-275-012-000  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

APN: 010-275-011  
 CARMELO ST, 5 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921

**verizon**  
 2770 SHADELANDS DR. BUILDING 11  
 WALNUT CREEK, CA 94599

**SEQUOIA**  
 DEPLOYMENT SERVICES, INC.  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630-2283

**ALLSTATES**  
 ENGINEERING & SURVEYING  
 23675 BIRTCHE DRIVE  
 LAKE FOREST, CA 92630

PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
Δ	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC



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SC001 CARMELO STONEWALL (OPT.2)  
**PUBLIC R.O.W. ADJACENT TO:**  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

SHEET TITLE  
**PROPOSED SITE PLAN**

SHEET NUMBER  
**A-1**

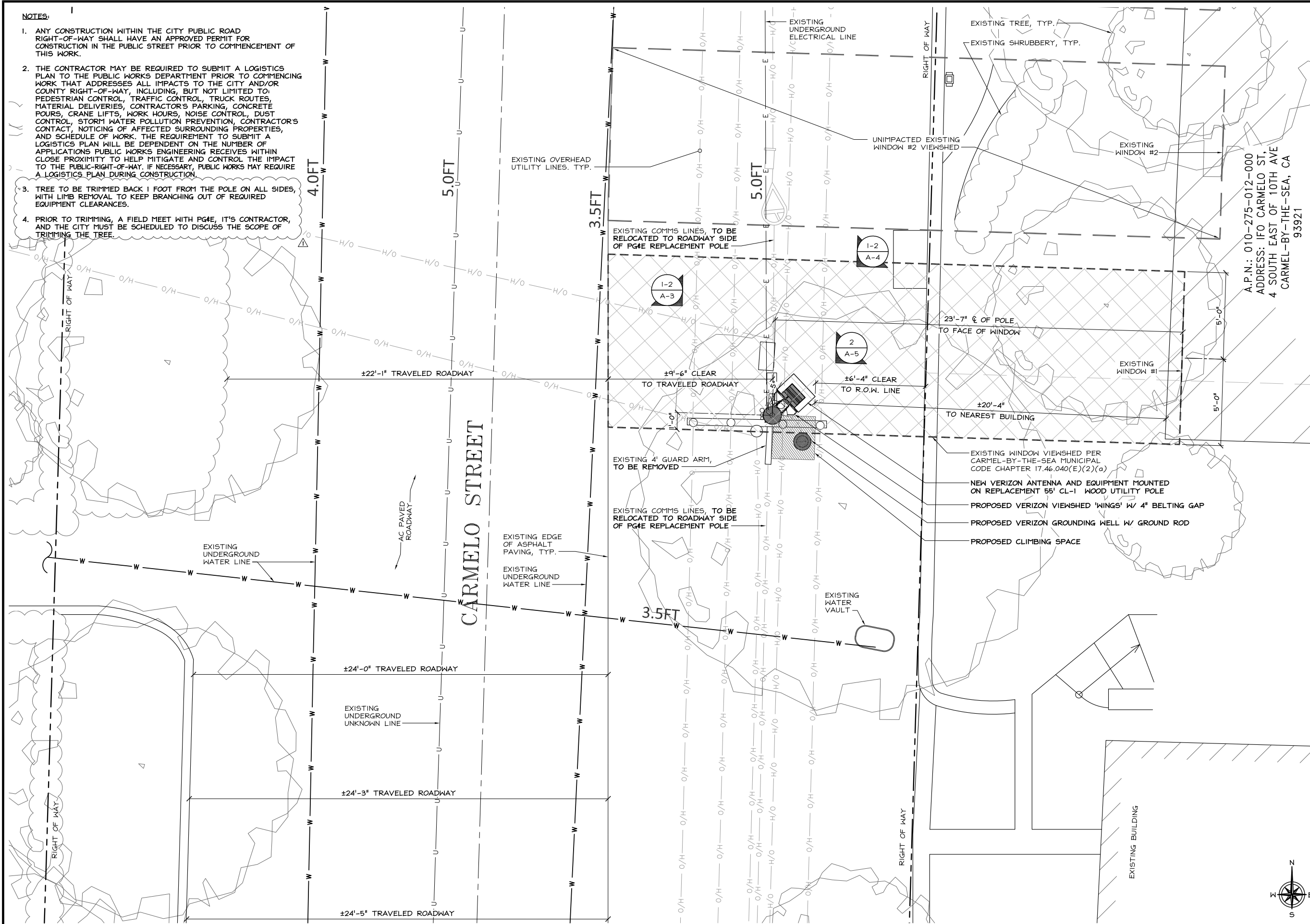
**PROPOSED SITE PLAN**

24"x36" SCALE: 1/8" = 1'-0"  
 11"x17" SCALE: 1/16" = 1'-0"  
 8' 6' 4' 2' 0' 8' 1



**NOTES:**

1. ANY CONSTRUCTION WITHIN THE CITY PUBLIC ROAD RIGHT-OF-WAY SHALL HAVE AN APPROVED PERMIT FOR CONSTRUCTION IN THE PUBLIC STREET PRIOR TO COMMENCEMENT OF THIS WORK.
2. THE CONTRACTOR MAY BE REQUIRED TO SUBMIT A LOGISTICS PLAN TO THE PUBLIC WORKS DEPARTMENT PRIOR TO COMMENCING WORK THAT ADDRESSES ALL IMPACTS TO THE CITY AND/OR COUNTY RIGHT-OF-WAY, INCLUDING, BUT NOT LIMITED TO, PEDESTRIAN CONTROL, TRAFFIC CONTROL, TRUCK ROUTES, MATERIAL DELIVERIES, CONTRACTOR'S PARKING, CONCRETE POURS, CRANE LIFTS, WORK HOURS, NOISE CONTROL, DUST CONTROL, STORM WATER POLLUTION PREVENTION, CONTRACTOR'S CONTACT, NOTICING OF AFFECTED SURROUNDING PROPERTIES, AND SCHEDULE OF WORK. THE REQUIREMENT TO SUBMIT A LOGISTICS PLAN WILL BE DEPENDENT ON THE NUMBER OF APPLICATIONS PUBLIC WORKS ENGINEERING RECEIVES WITHIN CLOSE PROXIMITY TO HELP MITIGATE AND CONTROL THE IMPACT TO THE PUBLIC-RIGHT-OF-WAY. IF NECESSARY, PUBLIC WORKS MAY REQUIRE A LOGISTICS PLAN DURING CONSTRUCTION.
3. TREE TO BE TRIMMED BACK 1 FOOT FROM THE POLE ON ALL SIDES, WITH LIMB REMOVAL TO KEEP BRANCHING OUT OF REQUIRED EQUIPMENT CLEARANCES.
4. PRIOR TO TRIMMING, A FIELD MEET WITH PG&E, IT'S CONTRACTOR, AND THE CITY MUST BE SCHEDULED TO DISCUSS THE SCOPE OF TRIMMING THE TREE.



A.P.N.: 010-275-012-000  
 ADDRESS: IFO CARMELO ST,  
 4 SOUTH EAST OF 10TH AVE  
 CARMEL-BY-THE-SEA, CA  
 93921



PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
Δ	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC



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SC001 CARMELO STONEWALL (OPT.2)  
 PUBLIC R.O.W. ADJACENT TO:  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMEL-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

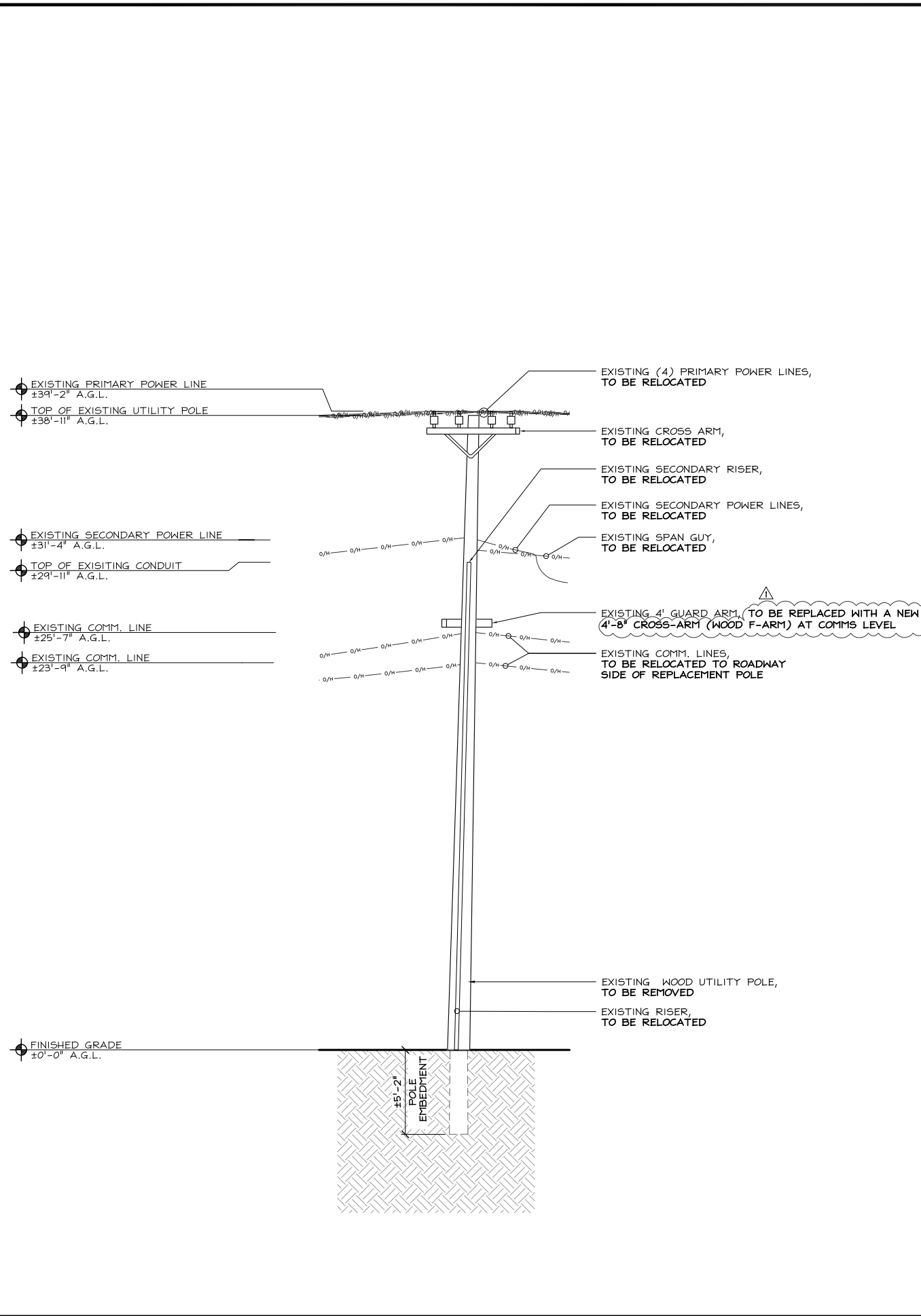
SHEET TITLE  
 ENLARGED SITE PLAN

SHEET NUMBER  
**A-2**

**ENLARGED SITE PLAN**

24"x36" SCALE: 3/8" = 1'-0"  
 11"x17" SCALE: 3/16" = 1'-0"

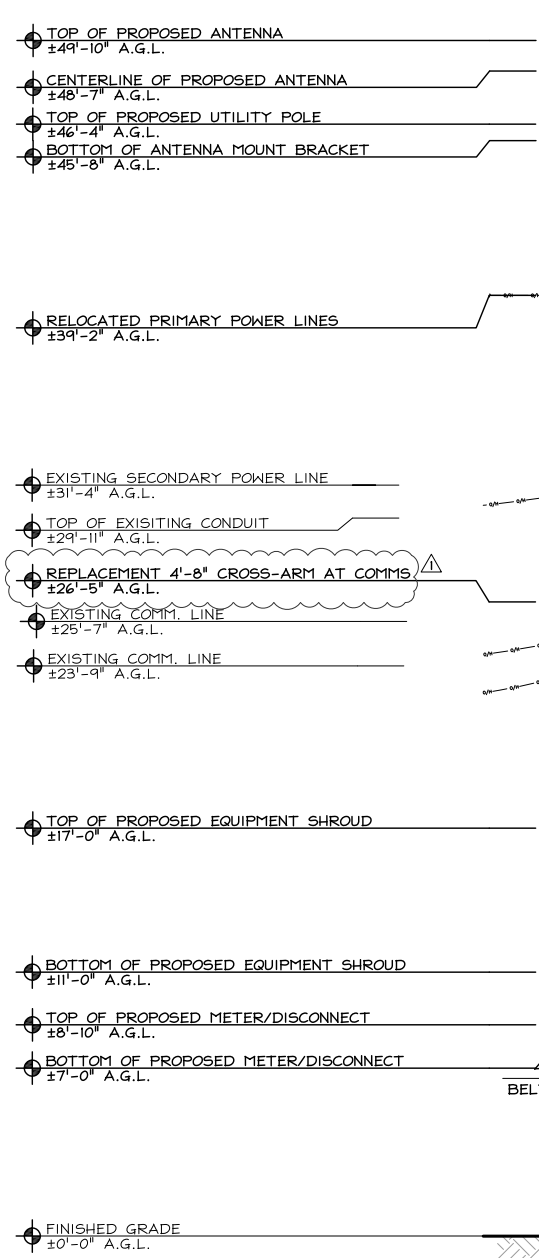




**EXISTING NORTHWEST ELEVATION**

24"x36" SCALE: 1/4" = 1'-0"  
 11"x17" SCALE: 1/8" = 1'-0"  
 4' 3' 2' 1' 0' 4'

- NOTES:**
1. TREE AND BUSHES NOT SHOWN FOR CLARITY.
  2. ALL LANDSCAPING TO BE RESTORED TO ORIGINAL CONDITIONS.
  3. RESTORE ASPHALT & ALL DISTURBED SURFACES BY NEW CABLE ROUTE PER CITY STANDARDS.
  4. ANTENNA CABLE CONDUIT SHALL PROJECT 6' MINIMUM ABOVE HIGHEST CONDUCTOR ON POLE.



**PROPOSED NORTHWEST ELEVATION**

24"x36" SCALE: 1/4" = 1'-0"  
 11"x17" SCALE: 1/8" = 1'-0"  
 4' 3' 2' 1' 0' 4' 1



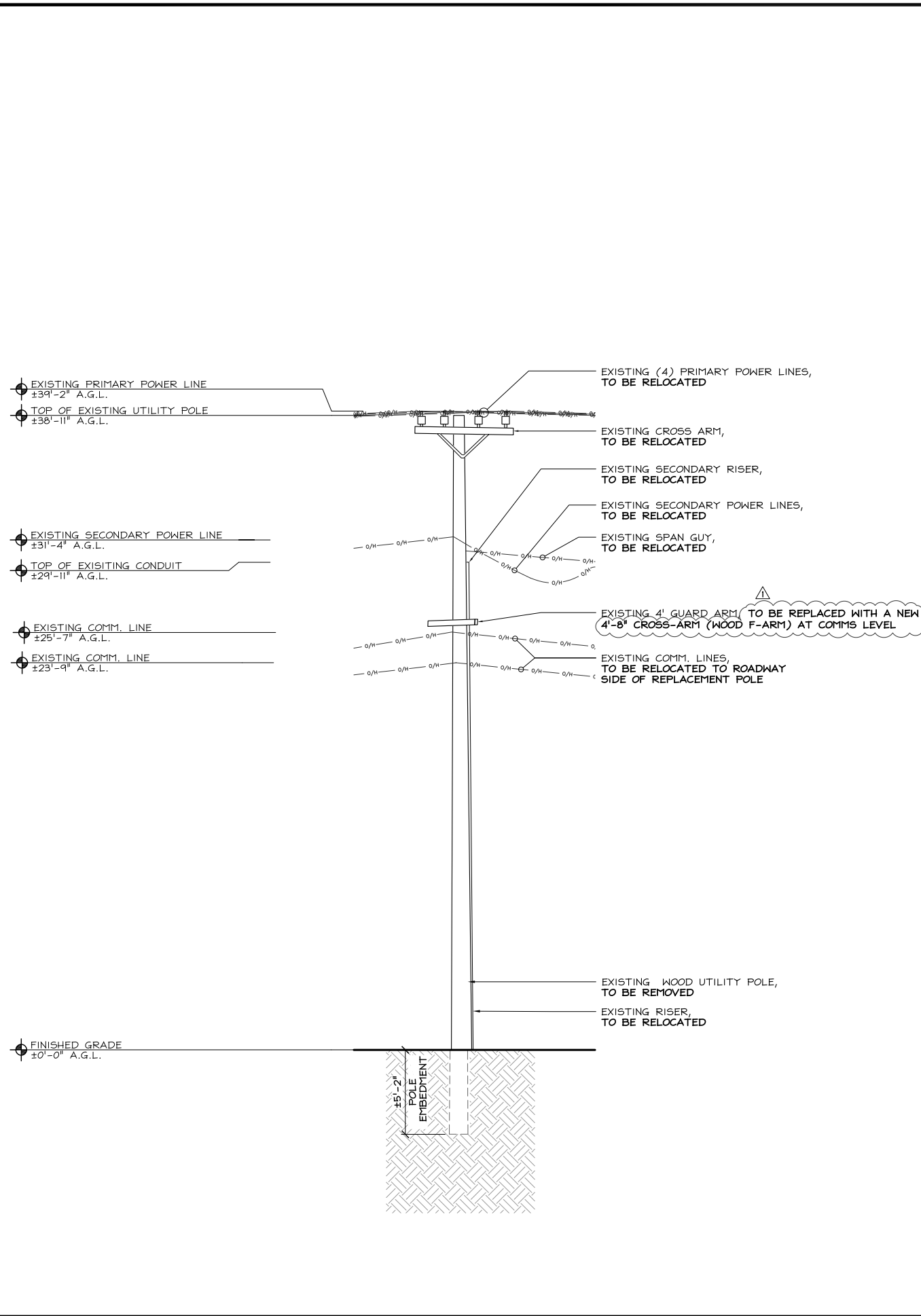
PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
	10/30/2025	100% CD (PGC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC

SC001 CARMELO STONEWALL (OPT.2)  
 PUBLIC R.O.W. ADJACENT TO:  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

SHEET TITLE  
**ELEVATIONS**

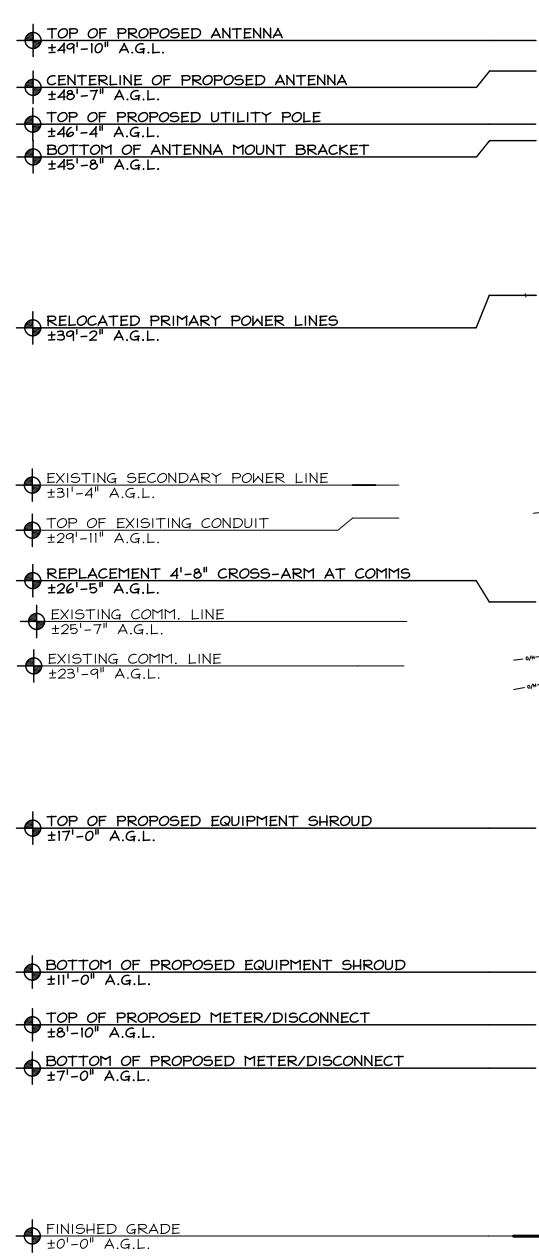
SHEET NUMBER  
**A-3**



**EXISTING NORTHEAST ELEVATION**

24"x36" SCALE: 1/4" = 1'-0"  
 11"x17" SCALE: 1/8" = 1'-0"  
 4' 3' 2' 1' 0'

**NOTES:**  
 1. TREE AND BUSHES NOT SHOWN FOR CLARITY.  
 2. ALL LANDSCAPING TO BE RESTORED TO ORIGINAL CONDITIONS.  
 3. RESTORE ASPHALT & ALL DISTURBED SURFACES BY NEW CABLE ROUTE PER CITY STANDARDS.  
 4. ANTENNA CABLE CONDUIT SHALL PROJECT 6' MINIMUM ABOVE HIGHEST CONDUCTOR ON POLE.



**PROPOSED NORTHEAST ELEVATION**

24"x36" SCALE: 1/4" = 1'-0"  
 11"x17" SCALE: 1/8" = 1'-0"  
 4' 3' 2' 1' 0'



PROJECT ID: TBD  
 DRAWN BY: MA  
 CHECKED BY: DW

REV	DATE	DESCRIPTION
	10/30/2025	100% CD (PGC-1)
4	11/12/2024	100% CD (NEW RFDS)
3	10/21/2024	100% CD's (VIEWSHED)
2	07/01/2024	100% CD's (ANTENNA CHG.)
1	06/17/2024	100% CD's (RADIO UPDATE)
0	06/06/2023	100% CD's FOR SUBMITTAL
A	04/27/2023	90% CD's FOR REVIEW

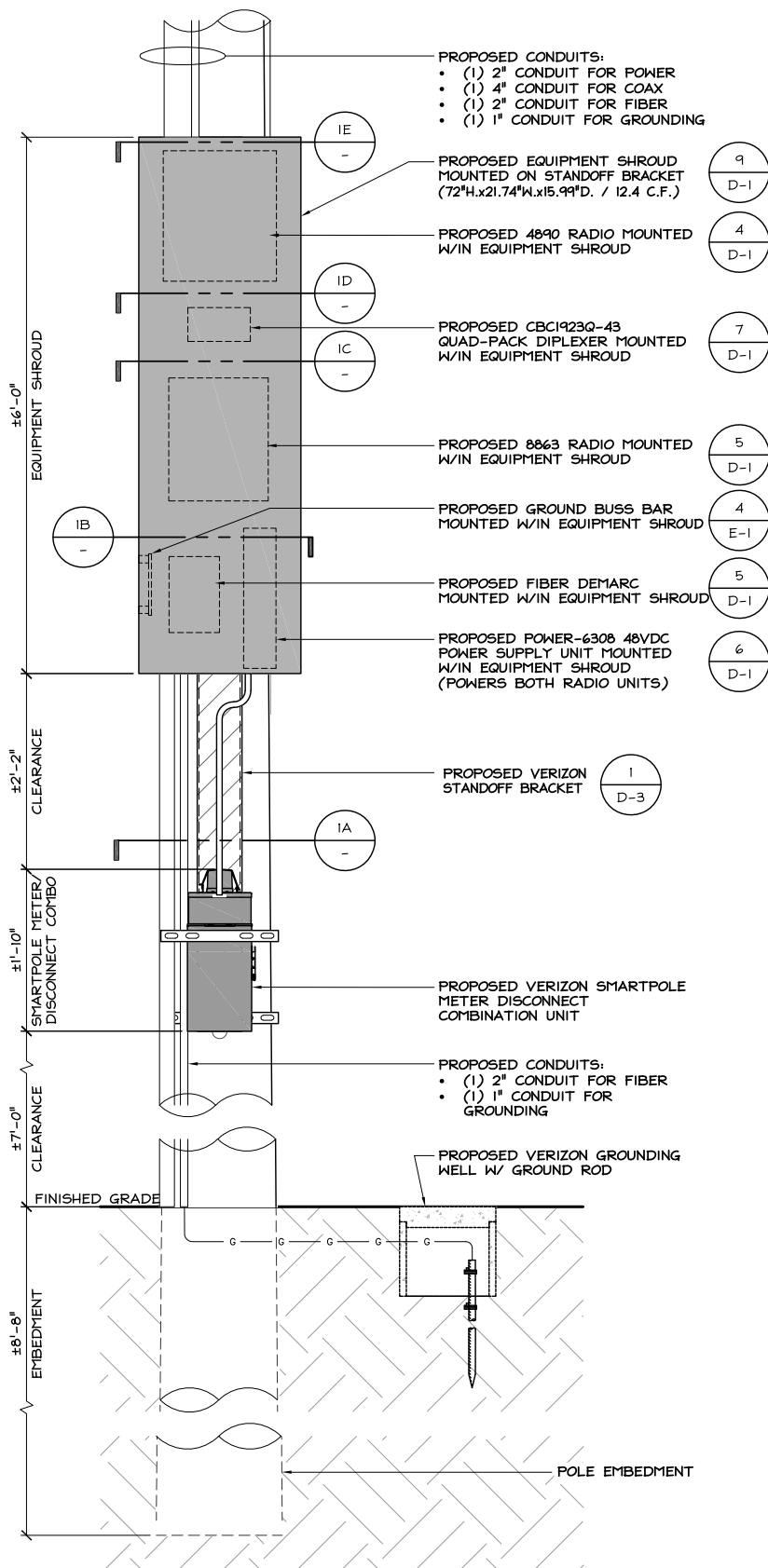
SC001 CARMELO STONEWALL (OPT.2)  
 PUBLIC R.O.W. ADJACENT TO:  
 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

SHEET TITLE  
**ELEVATIONS**

SHEET NUMBER  
**A-4**

**NOTES:**

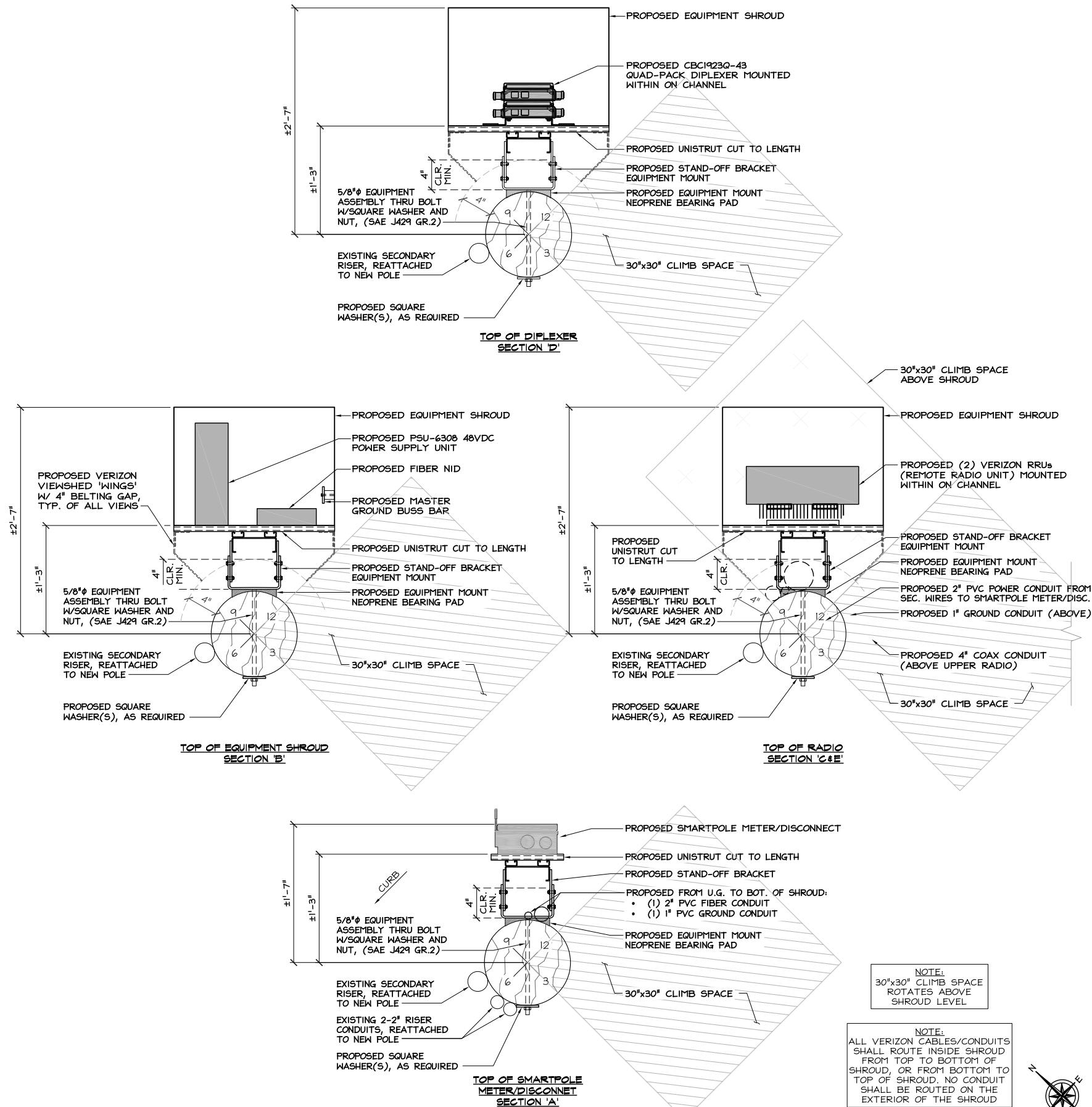
- REQUIRED EQUIPMENT STANDOFF FROM POLE IS MINIMUM 4" PER CPUC GO-95. ACTUAL DISTANCE WILL VARY WITH SPECIFIC POLE CONDITIONS AND CAN EXTEND AS MUCH AS 5". IN ALL CASES, EQUIPMENT WILL BE PLACED AS CLOSE TOGETHER AS POSSIBLE AND AS FLUSH TO POLE AS CONDITIONS ALLOW.
- INSTALL CLIMBING PEGS AS REQUIRED PER G.O.95



**PROPOSED ELEVATION**

24"x36" SCALE: 1/4"=1'-0"  
11"x17" SCALE: 1/2"=1'-0"

**2**



**PROPOSED EQUIPMENT LAYOUT PLAN**

24"x36" SCALE: NTS  
11"x17" SCALE: NTS

**1**

**verizon**  
2770 SHADELANDS DR. BUILDING 11  
WALNUT CREEK, CA 9459

**SEQUOIA**  
DEPLOYMENT SERVICES, INC.  
1 SPECTRUM POINTE DRIVE, SUITE 130  
LAKE FOREST, CA 92630-2283

**ALLSTATES**  
ENGINEERING & SURVEYING  
23675 BIRTCHEER DRIVE  
LAKE FOREST, CA 92630

PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
1	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC

REGISTERED PROFESSIONAL ENGINEER  
WISSAM ZALZALI  
71655  
CIVIL  
STATE OF CALIFORNIA

*W. Zalzali*

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SC001 CARMELO STONEWALL (OPT 2)  
PUBLIC R.O.W. ADJACENT TO:  
IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
CARMEL-BY-THE-SEA, CA 93921  
MDG NUMBER: 5000081318

SHEET TITLE  
**POLE-MOUNTED  
EQUIPMENT ELEVATIONS**

SHEET NUMBER  
**A-5**

**EQUIPMENT SHROUD (OR APPROVED EQUAL)**

CONSTRUCTION: 5000 SERIES ALUM. W/ CARBON STEEL BRACKET  
 PAINT: POWDER COAT (CUSTOMER SPEC.)  
 MOUNTING: COMBINED (FLUSH, BANDED, THRU-BOLTED, 6" OFFSET)  
 VOLUME: 12.4 CU. FT.  
 WEIGHT: 401 LBS. W/ EQUIPMENT

COMBINED MOUNT. FLUSH CONFIGURATION SHOWN IN THIS VIEW

**OR APPROVED EQUIVALENT**

COMMSCOPE DIPLEXER CBC1923Q-43  
 ERICSSON 8843 DUAL BAND RRH  
 ERICSSON 8843 DUAL BAND RRH  
 ERICSSON POWER 6302 PSU  
 8 POSITION GROUND BAR  
 DOOR & HEAT DEFLECTOR HIDDEN TO SHOW EQUIPMENT

**ERICSSON POWER-6308 (OR APPROVED EQUAL)**

ELECTRICAL SPECIFICATIONS:  
 MAX. INPUT POWER: 63A MAX. @ 240VAC  
 OPERATIONAL TEMP. RANGE: -40°C TO +55°C  
 NOMINAL INPUT VOLTAGE: 120VAC & 240 VAC  
 RATED OPER. VOLTAGE RANGE: 86-140 VAC & 172-264 VAC  
 EXTERNAL INPUT FUSE: 60A @ 120 OR 240 VAC  
 EXTERNAL AC FEED BREAKER: 2P/60A @ 240V  
 COLOR: GRAY (NCS S 1002-B)  
 MAX -48VDC OUTPUT: 6.0KW

AC POWER INPUT  
 -48VDC POWER OUTPUT PORTS (7 @ 50A MAX.)  
 SIGNAL INTERFACE PORTS  
 CONNECTION FOR (1) #6AWG DOUBLE-HOLE GROUNDING LUG

MOUNTING SHALL ALWAYS BE HANDLE-UP & PER EQUIPMENT SHROUD MFR. SPECS.  
 DIMENSIONS, HxWxD - mm (IN.): 477x343x110 (18.8 x 13.5 x 4.35)  
 WEIGHT: 14.0Kg 30.86 LBS.

**TRANSFORMER RATED SMARTPOLE METER AND 4-PIN SOCKET (OR APPROVED EQUAL)**

Plunger Switch

Transformer Rated SmartPole Meter And 4-pin Socket

**verizon**  
 2770 SHADELANDS DR. BUILDING II  
 WALNUT CREEK, CA 9459

**SEQUOIA**  
 DEPLOYMENT SERVICES, INC.  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630-2283

**ALLSTATES**  
 ENGINEERING & SURVEYING  
 23675 BIRTCHEER DRIVE  
 LAKE FOREST, CA 92630

**EQUIPMENT SHROUD** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **9**

**ARIA TECH - PART No. NID-12 FIBER DEMARC (OR APPROVED EQUAL)**

DIMENSION (HxWxD): 8.54"x10"x2.88"  
 SHIPPING WEIGHT: < 10 LBS.  
 CAPACITY: 12 FIBERS \*(6-PACK OF DUPLEX SC OR LC JUMPERS)\*  
 SPECIAL FEATURES: AVAILABLE AS A SINGLE OR DUAL-DOOR ENCLOSURE  
 EXPOSURE RATING: OUTDOOR / NEMA-3R + FOREIGN MATTER INTRUSION (FMI) PROTECTION NON-METALLIC ENCLOSURE  
 ATTACHMENT: DIRECT-MOUNT, BACKBOARD, UNISTRUT OR PIPE-MOUNT  
 COLOR: GRAY  
 UL LISTING: UL 497 **OR APPROVED EQUIVALENT**

**POWER SUPPLY UNIT (PSU)** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **6**

**ERICSSON RADIO 8863 (OR APPROVED EQUAL):**

- DIMENSION WxDxH (mm): 14.8"(375), 6.3"(160), 16.5"(420)
- WEIGHT (g): 57.4 lbs (< 26)
- 8TX/8RX
- SUPPORT SPLIT MODE (2 X 4T4R AS MULTI-SECTOR SOLUTION)
- Tx POWER 8x40W
- 200 MHz IBW TDD
- 2 x 25 Gbps CPRI (COMPATIBLE TO 10G) CPRI SFP2B
- 48 VDC, MAX ~ 1360W (80%TX-20%RX)

**OR APPROVED EQUIVALENT**

**SMARTPOLE METER - CODE : M241492(BY OTHERS) 3**

**TESCO CAT. 703 TRANSFORMER-RATED SMARTPOLE METER DISCONNECT BOX (OR APPROVED EQUAL)**

- CURRENT UP TO 60A
- CAT. 703-240 FOR 240V 2-WIRE SINGLE PHASE APPLICATIONS
- POWDER COATED G-90 GALVANIZED STEEL
- MARINE-GRADE HIGH DENSITY POLYETHYLENE (HDPE) HOLD DOWN STRAP
- 4-PIN RECEPTACLE
- TAMPER RESISTANT 1/4" SEAL
- GROUND/BONDING LUG
- NEMA 3R ENCLOSURE
- OPTIONAL POLE MOUNTING BRACKET (CAT. 703-PB)

**OR APPROVED EQUIVALENT**

PROJECT ID: TBD  
 DRAWN BY: MA  
 CHECKED BY: DW

REV	DATE	DESCRIPTION	
	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
3	10/21/2024	100% CD's (VIEWSHED)	NC
2	07/01/2024	100% CD's (ANTENNA CHG.)	NC
1	06/17/2024	100% CD's (RADIO UPDATE)	NC
0	06/06/2023	100% CD's FOR SUBMITTAL	NC
A	04/27/2023	90% CD's FOR REVIEW	NC

**FIBER DEMARCATION BOX** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **8**

**COMMSCOPE CBC1923Q-34 DIPLEXER (OR APPROVED EQUAL)**

QUAD-PACK DIPLEXER, PCS/AWS+WCS, DC BLOCK, 4.3-10 COLOR: GRAY  
 DIMENSIONS, HxWxD: 212x116x84MM (8.3"x4.6"x3.3")  
 WEIGHT: 3.7 KG (7.2 LBS) - #4/ MOUNT HARDWARE  
 CONNECTOR INTERFACE: 4.3-10 DIN FEMALE (LONG-NECK)

ELECTRICAL SPECIFICATIONS (SUB-MODULES 1&2, BRANCH 1)  
 LICENSE BAND: AWS 1700 / WCS 2300 / (3) TDD  
 OPERATING FREQUENCY BAND: 1695-1780 MHZ / 2110 - 2360 MHZ  
 INSERTION LOSS, MAXIMUM: 0.25 DB  
 OUTPUT PWR., MAX. COMP.: 100 W  
 TOTAL GROUP DELAY, MAX.: 15 NS

ELECTRICAL SPECIFICATIONS (SUB-MODULES 1&2, BRANCH 2)  
 LICENSE BAND: PCS 1900  
 OPERATING FREQUENCY BAND: 1850 - 1990 MHZ  
 INSERTION LOSS, MAXIMUM: 0.25 DB  
 OUTPUT PWR., MAX. COMP.: 100 W  
 TOTAL GROUP DELAY, MAX.: 15 NS

**OR APPROVED EQUIVALENT**

**C-BAND RRU SPECIFICATIONS** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **7**

**MANUFACTURER: ERICSSON MODEL: RADIO 4890HP 48B2 48B66 S (OR APPROVED EQUAL)**

DIMENSIONS, HxWxD IN: 17.5" x 15.2" x 7.0"  
 WEIGHT: 69.5 LBS  
 8 RF PORTS, 4T8R PER BAND (5 FOR TX)

ISO VIEW

**SMARTPOLE METER DISCONNECT BOX (M241692) 2**

**JMA CX200MI236 'CANISTER' ANTENNA**

20-PORT CYLINDER ANTENNA 1695-3980 MHZ  
 • 8 PORTS 1695-2690 MHZ  
 • 4 PORTS 3400-3700 MHZ  
 • 8 PORTS 3700-3980 MHZ

SMALL CELL MULTI-PORT CYLINDER ANTENNA FOR INCREASED COVERAGE & CAPACITY APPLICATIONS:  
 • 4x4 MIMO-CAPABLE 1695-2690 & 3400-3700 MHZ  
 • 8x8 BEAMFORMING-CAPABLE FOR 3700-3980 MHZ  
 • INCREASED 3.5 GHZ GAIN FOR IMPROVED COVERAGE  
 • SYMMETRICAL PATTERN PERFORMANCE ACROSS ALL 1695-2690 MHZ PORTS  
 • EXCELLENT CROSS-POLAR DISCRIMINATION FOR MIMO PERFORMANCE

REGISTERED PROFESSIONAL ENGINEER  
 WISSAM ZALZALI  
 71655  
 CIVIL  
 STATE OF CALIFORNIA

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SC001 CARMELO STONEWALL (OPT.2)  
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 IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE  
 CARMELO-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

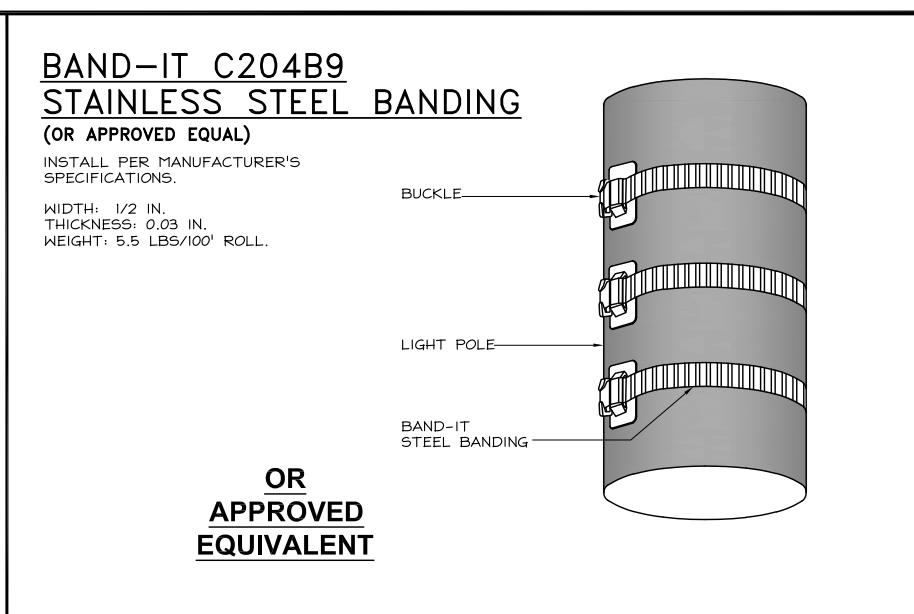
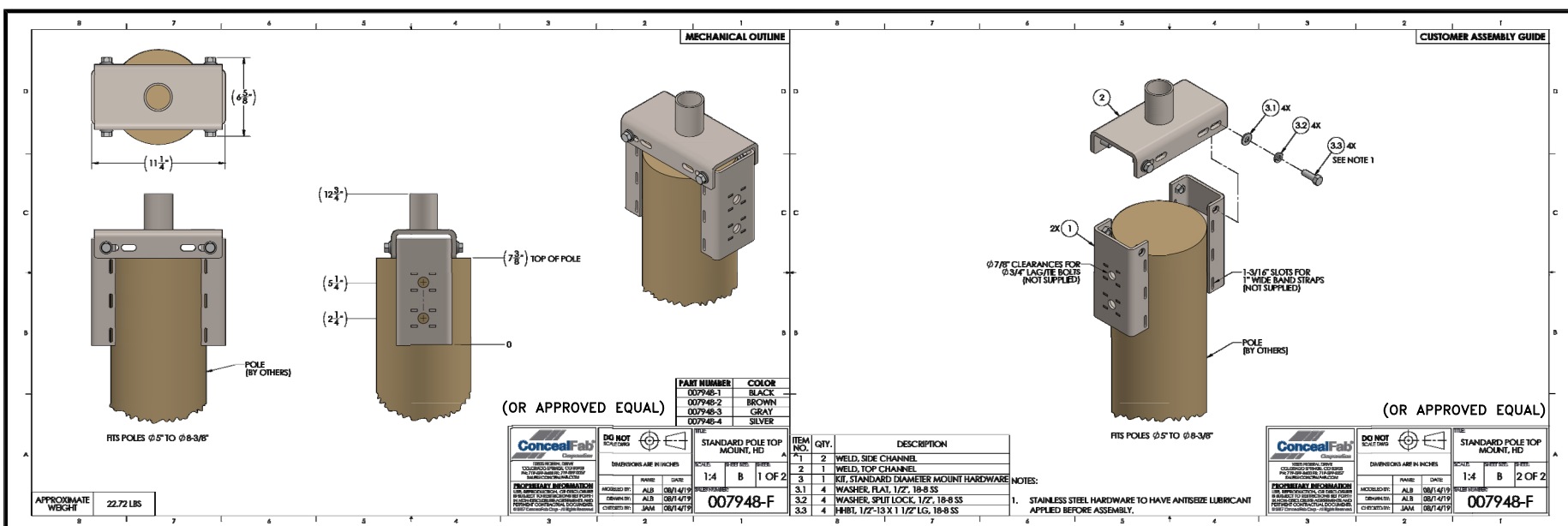
SHEET TITLE  
 EQUIPMENT DETAILS

SHEET NUMBER  
**D-1**

**4-QUAD DIPLEXER SPECS** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **7**

**RRU SPECIFICATION** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **4**

**ANTENNA** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **1**



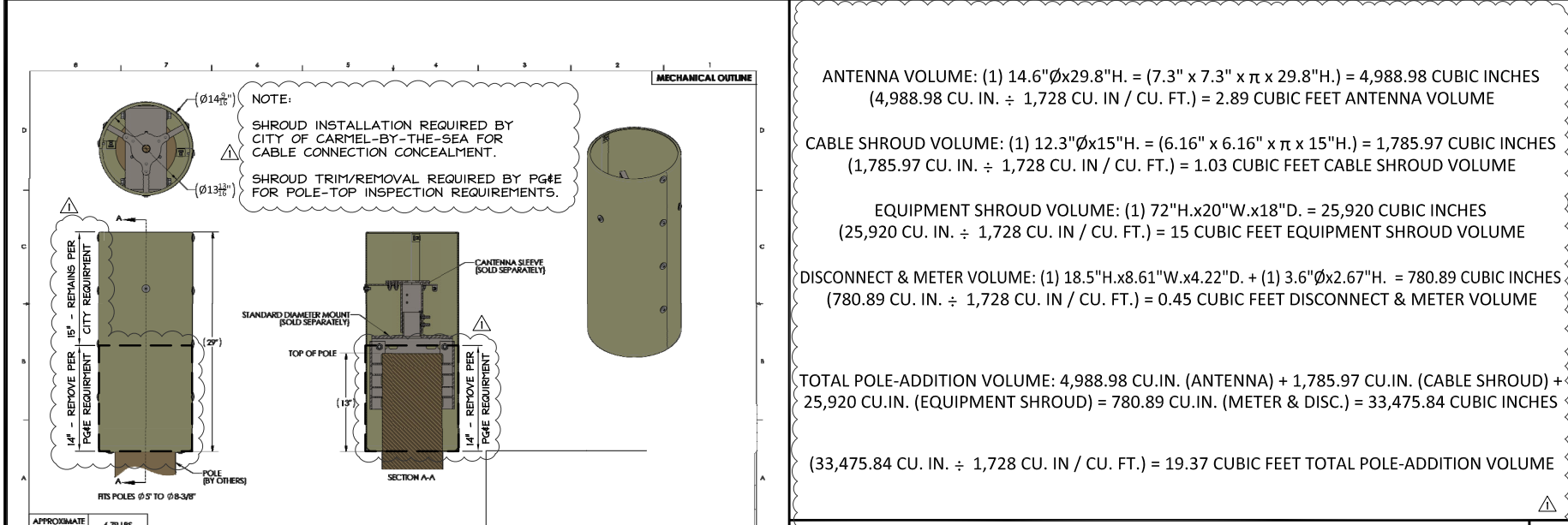
**verizon**

2770 SHADELANDS DR. BUILDING 11  
WALNUT CREEK, CA 94591

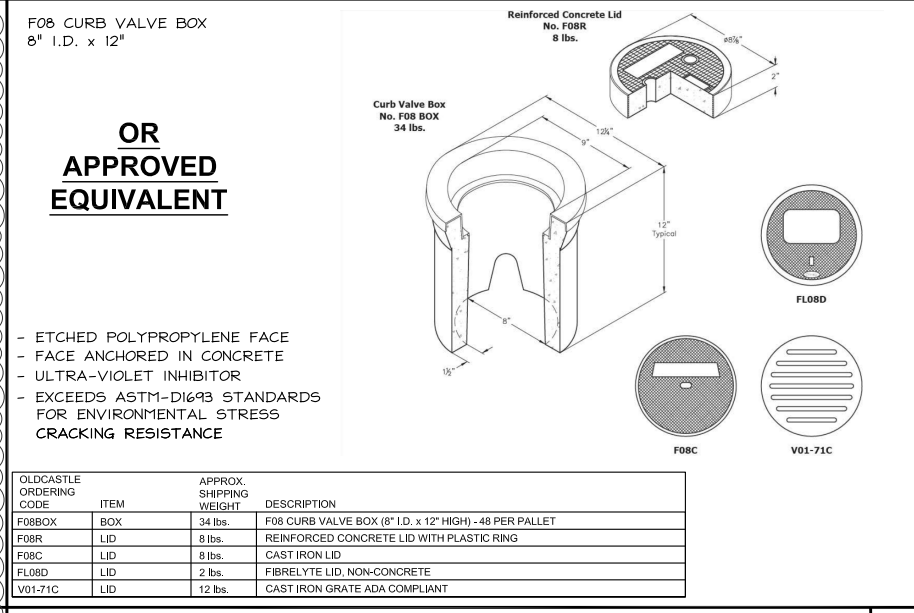
**SEQUOIA**  
DEPLOYMENT SERVICES, INC.  
1 SPECTRUM POINTE DRIVE, SUITE 130  
LAKE FOREST, CA 92630-2283

**ALLSTATES**  
ENGINEERING & SURVEYING  
23675 BIRTCHE DRIVE  
LAKE FOREST, CA 92630

**ANTENNA MOUNT** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **6**



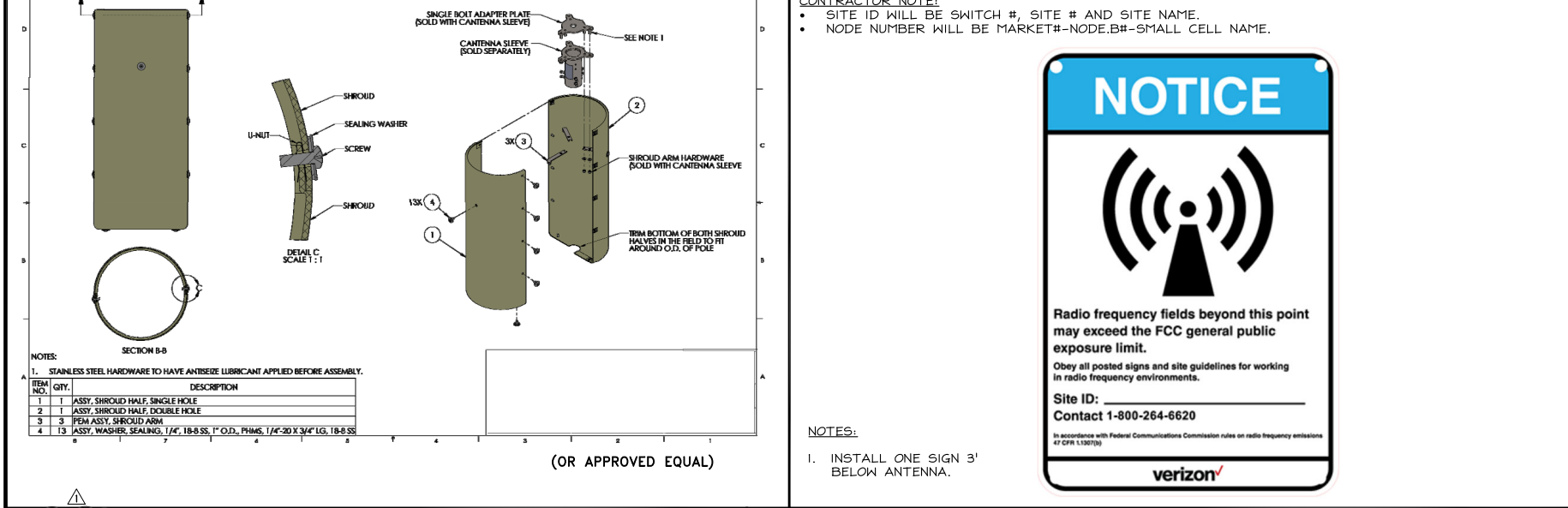
**STEEL BANDING** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **3**



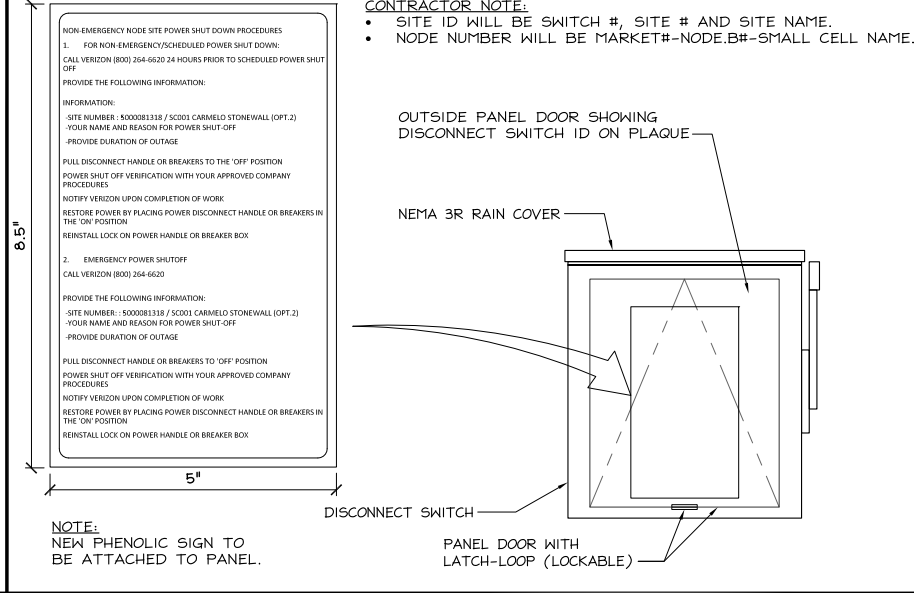
PROJECT ID: TBD  
DRAWN BY: MA  
CHECKED BY: DW

REV	DATE	DESCRIPTION
1	10/30/2025	100% CD (PCC-1)
4	11/12/2024	100% CD (NEW RFDS)
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**EQUIPMENT VOLUME TABLE** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **5**



**GROUNDING WELL** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **2**



REGISTERED PROFESSIONAL ENGINEER  
WISSAM ZALZALI  
71655  
CIVIL  
STATE OF CALIFORNIA

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CARMELO-BY-THE-SEA, CA 93921  
MDG NUMBER: 5000081318

SHEET TITLE  
EQUIPMENT DETAILS

SHEET NUMBER  
D-2

**CABLE SHROUD** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **5**

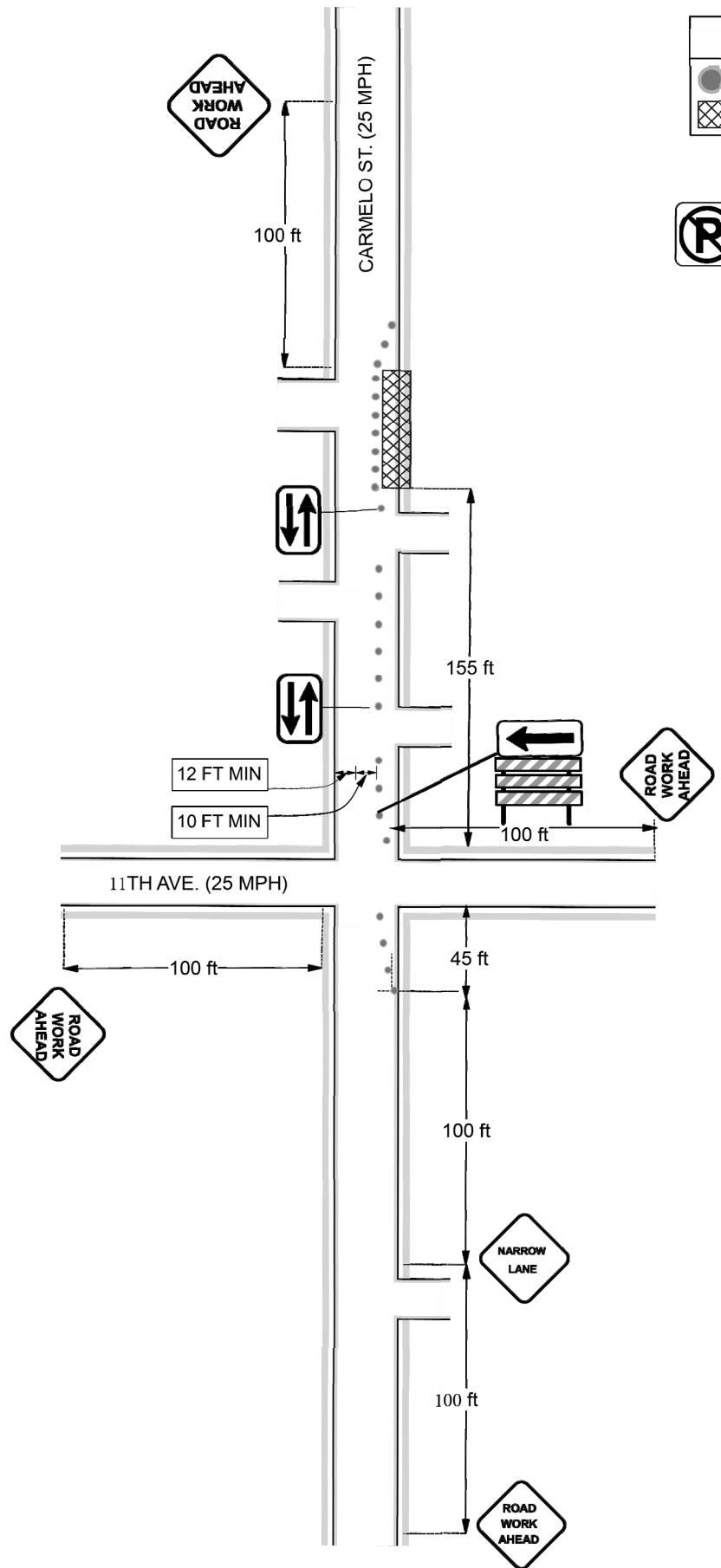


**SHUTDOWN SIGN ON DISCONNECT** 24"x36" SCALE: NTS 11"x17" SCALE: NTS **4**









**Legend**

- Cone 42"
- Work area

**NO PARKS TO BE PLACED 72 HOURS IN ADVANCE**

**PLAN NOTES:**

- PLANS DEPICTED ARE GENERAL GUIDELINES FOR TEMPORARY VEHICULAR TRAFFIC CONTROL PLANS (TCP) TO INCLUDE PEDESTRIAN AND WORKER SAFETY. CONTRACTOR IS REQUIRED TO HAVE PREPARED A SITE-SPECIFIC TCP FOR REVIEW AND APPROVAL BY THE HIGHWAY AUTHORITY HAVING JURISDICTION. IF REQUIRED, THE FIRM PREPARING THE TCP SHALL BE AUTHORIZED OR CERTIFIED BY THE AUTHORITY HAVING JURISDICTION.
- EXTEND CHANNELIZATION DEVICES INTO SHOULDER WHERE APPLICABLE.
- DISTANCES AS INDICATED IN TABLE 1 SHOULD BE INCREASED FOR CONDITIONS THAT WOULD AFFECT STOPPING. DISTANCE SUCH AS DOWNGRADES OR LIMITED SIGHT DISTANCES. DISTANCES CAN BE DECREASED FOR LOW-SPEED (RESIDENTIAL) AREAS WITH APPROVAL BY THE AUTHORITY HAVING JURISDICTION. NIGHT-TIME WORK IS PROHIBITED UNLESS IT IS REQUIRED AS A CONDITION OF APPROVAL BY THE HIGHWAY AND LOCAL AUTHORITY HAVING JURISDICTION.
- SHOULDER TAPERS SHOULD BE 1/3 OF THE ON-STREET TAPER LENGTH.
- MAINTAIN A MINIMUM LANE WIDTH OF 10'.

**verizon**  
 2770 SHADELANDS DR. BUILDING 11  
 WALNUT CREEK, CA 9459

**SEQUOIA**  
 DEPLOYMENT SERVICES, INC.  
 1 SPECTRUM POINTE DRIVE, SUITE 130  
 LAKE FOREST, CA 92630-2283

**ALLSTATES**  
 ENGINEERING & SURVEYING  
 23675 BIRTCHE DRIVE  
 LAKE FOREST, CA 92630

PROJECT ID:	TBD
DRAWN BY:	MA
CHECKED BY:	DW

REV	DATE	DESCRIPTION	
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 CARMEL-BY-THE-SEA, CA 93921  
 MDG NUMBER: 5000081318

SHEET TITLE  
**TRAFFIC CONTROL PLAN**

SHEET NUMBER  
**TCP-1**

**TABLE 1**

POSTED SPEED (MPH)	DISTANCE BETWEEN SIGNS			TAPER	BUFFER
	A	B	C		
15	100'	100'	100'	45'	100'
20	100'	100'	100'	80'	115'
25	100'	100'	100'	125'	155'
30	250'	250'	250'	180'	200'
35	250'	250'	250'	245'	250'
40	250'	250'	250'	320'	305'
45	350'	350'	350'	540'	360'
50	350'	350'	350'	600'	425'
55	500'	500'	500'	660'	495'
60	500'	500'	500'	720'	570'
65	500'	500'	500'	780'	645'

NOTES:  
 A) DISTANCES IN FEET UNLESS OTHERWISE NOTED.  
 B) CONTRACTOR TO VERIFY EXISTING SPEED LIMIT.  
 C) DISTANCES SHOWN ARE NOT VALID FOR LIMITED ACCESS HIGHWAYS. CONSULT STATE DOT MANUAL FOR DISTANCES.



**VEHICULAR TRAFFIC CONTROL PLAN**

24"x36" SCALE: NTS  
 11"x17" SCALE: NTS

**1**



# CTC Telecommunications Network Consulting



## Review of the Supplemental Report February 6, 2026

Prepared for City of Carmel-by-the-Sea, California  
February 2026

This report addresses the following:

1. Explains why CTC concluded small cell option at Golden Bough Theater would not effectively address Verizon's stated coverage deficiencies.
2. Provides a preliminary technical analysis of the feasibility of Verizon's macro site option at Golden Bough Theater.

**Why did CTC's Initial Report "Review of the Application of Verizon Wireless to Install a New Small Wireless Facility" dated January 2026 conclude the Golden Bough Playhouse would not effectively address Verizon's stated coverage deficiencies?**

Verizon's application proposed a small wireless facility solution which included radios for the mid-band frequencies (1900-2100 MHz), but it did not include low-band frequencies. Instead, it included the newer mid-band (a higher mid-band known as C band which is 3700-3860 MHz) that has lesser coverage area than the other mid-band since it is about twice the frequency of the earlier mid-band frequencies. This new band would allow Verizon to provide effective 5G coverage to customers which is lacking in the Carmel area. The engineering drawings and design plans submitted by Verizon for South Carmel 001 were focused on compliance with the City's requirements for Small Wireless Facilities. Small Wireless Facilities have restrictive requirements regarding the antennas, associated electronic equipment.<sup>1</sup> The size limitations imposed by the FCC necessarily impact on the coverage area of a small cell due to the radiation efficiency of smaller antenna size and the minimal transmission equipment (radios and diplexers).

This small cell solution differs from Verizon's 2021 application in several significant ways that affect the technical feasibility of the Golden Bough Theater location as an alternative. Verizon's 2021 application included low-band (typically around 700 MHz) which has greater range and mid-band service radios (which has a shorter range but more capacity). The proposed location for the small cell facility relative to the Golden Bough Theater also changed meaningfully which affects coverage. Figure 1 is a Google map showing the locations of the original 2021 application and the proposed new site. The approximate distance between the 2021 site and the Golden Bough Theater is 570 feet. The distance from the theater to the current proposal is close to double the distance, approximately 1040 feet.

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<sup>1</sup> A Small Wireless Facility is defined by the FCC in the CFR Title 47, Chapter I, Subchapter A, Part 1, Subpart U § 1.6002 (I).





## Verizon's New Option of Constructing the Proposed Wireless Facility at Golden Bough Theater with a Macro Site Configuration

Unlike small wireless facilities, macro sites are not subject to size limitations established by the FCC and are often constructed with multiple large antennas serving two or more sector areas with multiple radios and electronic equipment that provides coverage well beyond the limited range of the small cell equipment previously proposed by Verizon and their application.

In PierCon Supplemental Report #2 (dated 1-30-26) PierCon conducted a preliminary assessment of the feasibility of constructing a two-antenna sector macro tower deployment on the roof Golden Bough Theater facility. PierCon was able to establish the technical parameters for a macro tower configuration that "produced marginally acceptable results". This proposed macro facility has the following characteristics:

- Antenna azimuths - 220° and 330°
- Antenna radiation center - 34 feet AGL
- Antenna model – Andrew NHHS4-65B-R3B
- Antenna dimensionas – 72" (H) x 13.8 " (W) x 8.2" (D)

The PierCon report did not contain any computer RF coverage maps of or drawings of the candidate macro site configuration.

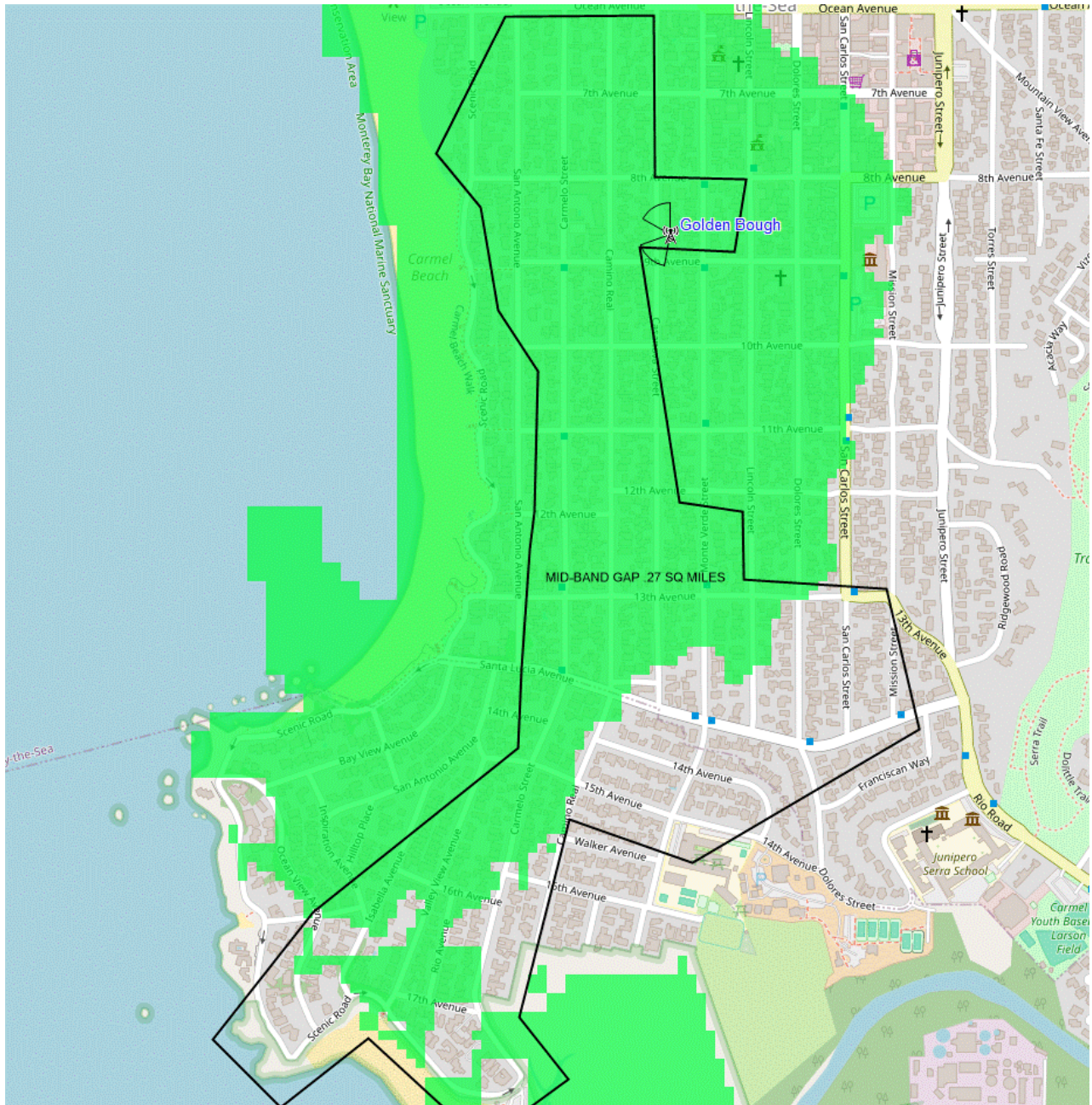
At the request of the city's planning department, we have independently prepared a preliminary coverage map using computer modeling including the performance parameters of the proposed radios and antennas. This map covers areas of the signal power of -95dBm or greater, with coverage area in green in Figure 3.

Additional coverage within the gap area (not shown in Figure 3) will be provided by the already approved small cell site South Carmel 002 located outside the city and South Carmel 005 east of the city. (For details on the coverage provided by these small cell sites, please examine the mid-band coverage map prepared in the PierCon report, reproduced as our Figure 2 above). Note that while the computer model we use takes into account "clutter loss" from nearby building and trees in the area using data gathered from satellite mapping, the granularity of the data does not reach down to individual tree level.

The PierCon report, on page 6, states "This attenuation is especially critical given that mid-band frequencies are inherently more susceptible to vegetation loss, particularly when tree canopies are located in close proximity to the antenna. A field-based review of the area west of the building confirms the presence of dense, tall vegetation that would materially degrade signal levels relative to those predicted by the propagation model"

We concur that field measurements will need to be made prior to any detailed planning, engineering and design. DeltaPhase in their submission also endorsed the need for field propagation testing to verify that minimum coverage goals can be achieved prior to design and deployment.

Figure 3: Computer Modeled -95 dBm Midband RF Coverage Map



Green Area Signal Power of -95 dBm or greater

Black border line is the Verizon Mid-band boundary gap traced from the PierCon report.

Based on this preliminary assessment, we conclude that a macro site using mid-band at Golden Bough Theater could be a technically feasible solution for addressing service deficiencies. We did not specifically examine C band coverage, however we anticipate that the trees adjacent to Golden Bough Theater will have a greater impact in attenuation than with the lower mid-band frequencies.

## What Our Report Does Not Cover Regarding the Technical Feasibility of Verizon's Macro Site Alternative

- Additional computer modeling of the RF signal coverage with other UHF computer modeling software. Field coverage propagation testing, employing test equipment operating in the three (1900, 2150 and the 3,700 MHz Verizon bands.)
- Perform an RF Emissions Exposure analysis to evaluate compliance with FCC guidelines
- Structural analysis of the Golden Bough Theater roof and availability of space for equipment and access to utilities
- Compliance with Carmel Municipal Code requirements



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# Radio Frequency Supplemental Report #2

## Site ID: "Carmel Node 001" RF Supplemental Report

Carmelo Street  
Carmel-by-the-Sea, CA 93921  
Monterey County

Prepared for  
Verizon Wireless

By  
PierCon Solutions, LLC  
January 30, 2026

---

10 PARK PLACE BUILDING 6C SUITE 402, BUTLER, NJ 07405 PHONE 973-628-9330

## The following addresses additional questions posed after the public meeting on January 21, 2026

### 1. Will Verizon's proposal interfere with LMR / Public Safety Radio?

No. Verizon's wireless system operates on frequency bands that are separately licensed and exclusively assigned to Verizon by the Federal Communications Commission (FCC), and are distinct from the frequencies allocated for LMR and public-safety radio services. FCC regulations require all licensed operators to design, operate, and maintain their systems in a manner that prevents harmful interference to other licensed users. In practice, commercial wireless facilities are routinely collocated with public-safety and other LMR systems nationwide without interference issues.

### 2. Provide clarification on coverage provided from SC002 and SC005.

Please refer to the attached EXHIBIT 1 which is a modeled best server plot that demonstrates the contribution of each existing site in the network. Best server plots were prepared representing a threshold of -95 dBm RSRP. Areas without any color represent lack of dominant server in the area, consistent with the drive test poor signal quality areas.

- Downtown Carmel's transmitters provides dominance in the areas illustrated with dark green, blue, and pink in the upper right hand corner of map.
- SF South Carmel 003's transmitters provides dominance in the areas illustrated with burgundy and navy in the center right portion of the map
- The Founder's Building's transmitters provides dominance in the area illustrated with yellow, appearing along the west portion of the map.

Please refer to the attached EXHIBIT 2 which is a modeled best server plot that demonstrates the contribution of each existing and approved site (SF-002 and SF-005) in the network.

- Downtown Carmel's provided coverage is illustrated with dark green, blue, and pink colors in the upper right hand corner of map.
- SF South Carmel 003's coverage is illustrated with burgundy and navy colors in the center right portion of the map
- The Founder's Building's provided coverage is illustrated in a yellow color, appearing along the west portion of the map.
- SF South Carmel 002's transmitters provides dominance in the area illustrated with a red color appearing in the lower left corner of the map
- SF South Carmel 005's transmitters provides dominance in the area illustrated with a light blue color appearing in the right central part of the map.

As can be seen from Exhibit 2, SF South Carmel 005 extends dominance east of the gap area only. SF South Carmel 002 provides dominance in the southwest portion of the service gap area only.

Exhibit 2 demonstrates that the result of the existing and approved sites' coverage still leaves a coverage deficiency at mid band, which must be addressed by a new facility.

### **3. Drive Test vs Modeling**

Drive testing is conducted to measure existing signal levels from operational wireless facilities. Modeling is used to plan wireless networks and to evaluate the expected signal levels from future sites, by producing coverage maps. Drive tests collect live data on roads that can be driven while modeling provides coverage across an area. Both are used collectively to design and optimize wireless networks.

### **4. Activation of approved sites (002/005) on capacity and drop calls**

Due to the poor signal quality in the area (SINR) a need to provide a dominant serving site is necessary to provide adequate service. Please refer to the attached EXHIBIT 2 which is a modeled best server plot that demonstrates the area of dominance of each approved and existing site that will serve at the desired -95 dBm (minimum in-building design level) reference signal power level.

As can be seen from Exhibit 2, only SF South Carmel 002 provides a dominant reference signal power to the southwest portion of the service gap area (grey hashed polygon). It is expected that the existing poor service in this area will be markedly improved once the site is operational. This is because a new reliable dominant signal will be present and overcome the poor signal power (RSRP) level at mid band (see attached Exhibit 3), and poor signal quality (SINR) at low band (see attached Exhibit 4). The extent of SF South Carmel 002's contribution is limited to the area shaded in red only, as this corresponds to the reliable in-building signal level of -95 dBm RSRP on Exhibit 2. From 12<sup>th</sup> Avenue to 7<sup>th</sup> Avenue, between Cassanova Street and San Antonio Ave, the service gap remains unchanged, and therefore a solution is still warranted.

### **5. Validation of Drive Test Data**

The drive test data collected was performed utilizing a calibrated receiver and industry standard equipment. See attached certificate of calibration (Exhibit 7). The methodologies utilized are sound and the data provided has not been adjusted in any manner.

### **6. Segmenting of 2100 MHz**

Verizon deploys its licensed frequency bands in the most efficient means possible to ensure they have a reliable network. The issue here is not with segmentation of the mid-band frequencies. The issue is providing a dominant server in the area where low band is causing poor signal quality and drop calls, and mid-band signal isn't reaching into the area of the gap. Therefore, segmentation will have zero impact on improving mid band coverage or improving signal quality (SINR) into the gap area. What is needed is a site that provides a dominant mid-band serving signal to the area. There currently is none.

## **7. Further explanation of summary table -stats on Golden Bough, interference, overlap**

Summary table 3 provided on page 22 of the PierCon RF report provides the statistical analysis comparison between the modeling of the Proposed Site and the Alternate Golden Bough location. The data illustrates that the Proposed Site will address 37 percent of the service gap area (desired), with the predicted signal overlap potential of 48 percent (not desired). By comparison, a two sector site at the Golden Bough will address 31 percent of the service gap area (desired), with the predicted signal overlap potential of 85 percent (not desired). The conclusion is that the Proposed Site is in the proper location, maximizing the desired coverage, and limiting the undesired coverage. The Golden Bough location provides more undesired coverage than desired coverage, indicating it is in the wrong location to meet Verizon's design objectives.

## **8. Causation of drop calls -definition and explanation**

The dropped calls in the Service Area Gap are the result of the absence of a dominant serving site, which leads to poor signal quality. This condition is clearly reflected in the industry-standard drive test data, including the signal quality (SINR) and best-server maps provided.

Users initially connect to the LTE network through nearby cell sites; however, as they move away from those sites, signal quality degrades rapidly. This degradation occurs first on mid-band frequencies, followed by a transition to low-band frequencies as distance from the serving site increases. As demonstrated in the drive test data, low-band signal levels are stronger within the gap area, resulting in users primarily operating on low-band spectrum in this region.

Because low-band frequencies propagate over greater distances, they overlap with multiple surrounding sites. The best-server maps confirm that this overlap produces areas where low-band signals from different sites arrive at similar power levels. In the absence of a dominant serving sector, these overlapping signals interfere with one another, resulting in degraded signal quality and poor SINR.

Without a dominant signal, all non-serving signals are treated as interference, creating an unstable RF environment that leads to dropped calls. The dropped-call data further confirms this condition, showing the highest concentration of dropped calls occurring on low-band frequencies from the sites currently serving the area. This relationship is well understood by experienced radio-frequency engineers and directly results from the lack of a dominant serving site within the Service Area Gap.

## **9. Optimizing existing sites to provide additional bandwidth?**

No. Additional bandwidth is primarily a capacity-related solution and does not address the underlying cause of the service gap. The deficiency in this area is not due to network

capacity, but rather the absence of a dominant serving site and adequate mid-band signal coverage.

Optimization of existing sites cannot create a dominant mid-band signal within the gap area. To meaningfully improve service quality, a new site must first be deployed to establish dominant mid-band coverage. Once a dominant mid-band serving sector is in place, the low-band antennas on surrounding sites can be further downtilted to reduce excessive low-band overlap in the area.

Implementing low-band downtilting prior to establishing a dominant mid-band signal would worsen network performance by further degrading signal quality (SINR), increasing interference, and resulting in additional dropped calls.

## 10. Frequency shift by users-ability to support users

The LTE network manages frequency selection and transitions seamlessly. User devices are initially served on mid-band frequencies when signal quality allows, as mid-band spectrum provides the best balance of coverage, signal quality, and data throughput.

As a user moves farther from the serving site and mid-band signal quality degrades, the device automatically transitions to the next available lower-frequency band with better propagation characteristics. This progression typically follows the sequence of approximately 3700 MHz, 2100 MHz, 1900 MHz, 850 MHz, and ultimately 700 MHz.

If, upon reaching the 700 MHz band, signal quality remains poor due to the absence of a dominant serving site—where overlapping signals from multiple sites introduce interference and degrade SINR—the RF environment becomes unstable and the call will drop.

## 11. FCC maps

The FCC coverage maps submitted by Beagle represent modeled *outdoor* signal levels only and do not reflect indoor service performance. Verizon’s network design objective in this area is to provide reliable *in-building service*, which is not depicted or evaluated in the FCC maps.

In addition, the FCC maps do not distinguish between individual frequency bands, nor do they provide any indication of signal quality, such as signal-to-interference-plus-noise ratio (SINR). As a result, the maps do not capture the interference conditions or lack of a dominant serving site that are central to the service issues identified in this area.

The FCC itself acknowledges these limitations in the disclaimer on its broadband coverage website, which states in part:

*“Please note that the map does not include information on the availability of **mobile wireless broadband service while indoors**. Moreover, because the coverage map is based on propagation modeling, a user’s actual, on-the-ground experience may vary due to factors*

*such as the end-user device used to connect to the network, cell site capacity, and terrain. The coverage maps on mobile wireless service providers' websites may be based on different parameters and assumptions, such as service availability provided through roaming agreements, and therefore may differ from the information shown here."*

Accordingly, FCC coverage maps are not an appropriate substitute for industry-standard drive test data and frequency-specific RF engineering analyses when evaluating in-building wireless service performance.

## 12. Alternates

### 1. The Wastewater District Facility

The Wastewater District Facility was modeled to evaluate what the coverage contribution would be as related to the existing service gap area. Please refer to Exhibit 5 for a graphical representation of the expected -95 dBm coverage to be provided from this location. As can be seen, this site is located well south of the service gap area, and even when modeled at 67 feet above ground level, does not contribute reliable signal level to the service gap area. If the site does not contribute to the reliable in-building signal level, it will have no impact on addressing the poor network service performance items.

### 2. Golden Bough

As discussed previously in the RF Report, the Golden Bough location is situated approximately 900 feet from the existing Verizon SF South Carmel 003 facility and approximately 1,100 feet from the Proposed Site. When modeled using a canister clover antenna configuration at a height of 24 feet above ground level (AGL), the site produces excessive overlap with existing facilities, resulting in increased interference rather than meaningful coverage extension into the Service Area Gap. Under this configuration, the Golden Bough location does not function as an equivalent alternative to the Proposed Site.

Additional best-server modeling was performed to assess whether the site could be made viable under more aggressive and constrained design parameters. The only configuration that produced marginally acceptable modeled results required all of the following conditions simultaneously:

- Antenna centerline height: 34 feet AGL
- Antenna azimuths: 220° and 330°
- Antenna model: Andrew NHHS4-65B-R3B
- Antenna dimensions: ~ 72 inches (H) × 13.8 inches (W) × 8.2 inches (D)
- Narrow horizontal beamwidth antennas

Even under this highly constrained and optimized configuration, the modeling results must be evaluated against actual field conditions. The Golden Bough building is surrounded by mature, tall trees, particularly along the west side of the property, in close proximity to the proposed antenna mounting locations.

As shown on Exhibit 6, the Golden Bough Building is located near the center of the map. The blue lines illustrate the modeled antenna azimuths (220° and 330°), while the red lines depict the corresponding 3 dB horizontal beamwidths. Notably, multiple large trees along Casanova Street fall directly within each antenna's main radiation pattern. These trees exceed the height of a potential 34-foot antenna installation and would significantly attenuate mid-band signals.

This attenuation is especially critical given that mid-band frequencies are inherently more susceptible to vegetation loss, particularly when tree canopies are located in close proximity to the antenna. A field-based review of the area west of the building confirms the presence of dense, tall vegetation that would materially degrade signal levels relative to those predicted by the propagation model.

As a result, the modeled performance at this location does not reliably translate to real-world conditions. When accounting for antenna height limitations, proximity to existing Verizon sites, excessive overlap, and substantial tree-induced signal attenuation, the Golden Bough location cannot provide dominant mid-band coverage to the Service Area Gap and therefore does not represent a feasible or equivalent RF alternative to the Proposed Site.

## **12. Design - Ability to reduce equipment to C-band only**

No. Verizon designs its network to operate across its full portfolio of FCC-licensed frequency bands to provide reliable and continuous service. The 1900 MHz (PCS) and 2100 MHz (AWS) bands provide substantially greater propagation range than 3700 MHz (C-Band) and are necessary to support seamless band-to-band transitions as users move throughout the network.

Limiting the design to C-Band only would significantly reduce coverage due to its shorter propagation characteristics and would require the deployment of additional facilities to address the Service Area Gap. Such an approach would be inconsistent with sound RF engineering practices and would increase both infrastructure density and visual impact, rather than reduce it.

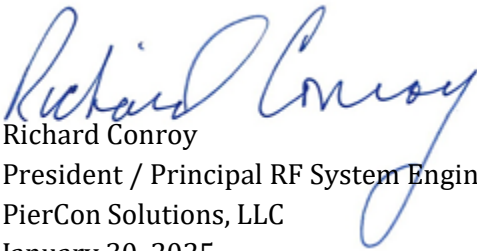
## **13. 911 calls on any carrier?**

No. Emergency calls are routed to another carrier's network only when a user's device has *no service at all* on its home carrier, not when service is present but degraded. In the Service Area Gap, Verizon service is available but inadequate due to the absence of a dominant serving site, resulting in poor signal quality (low SINR).

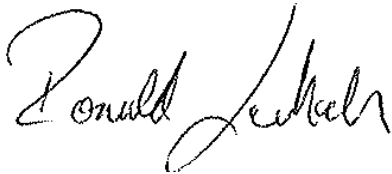
Under these conditions, user devices remain camped on Verizon's network and attempt to place calls—including 911 calls—on that network. Because signal quality is poor, calls frequently fail or drop. This behavior is confirmed by the dropped-call data presented, which shows elevated call failures within the gap area.

In this location, 911 calls will not reliably transfer to another carrier, as the device continues to recognize Verizon as the serving network throughout the Service Area Gap. As a result, emergency calling performance is directly impacted by the lack of a dominant Verizon serving site in the area.

Prepared by:

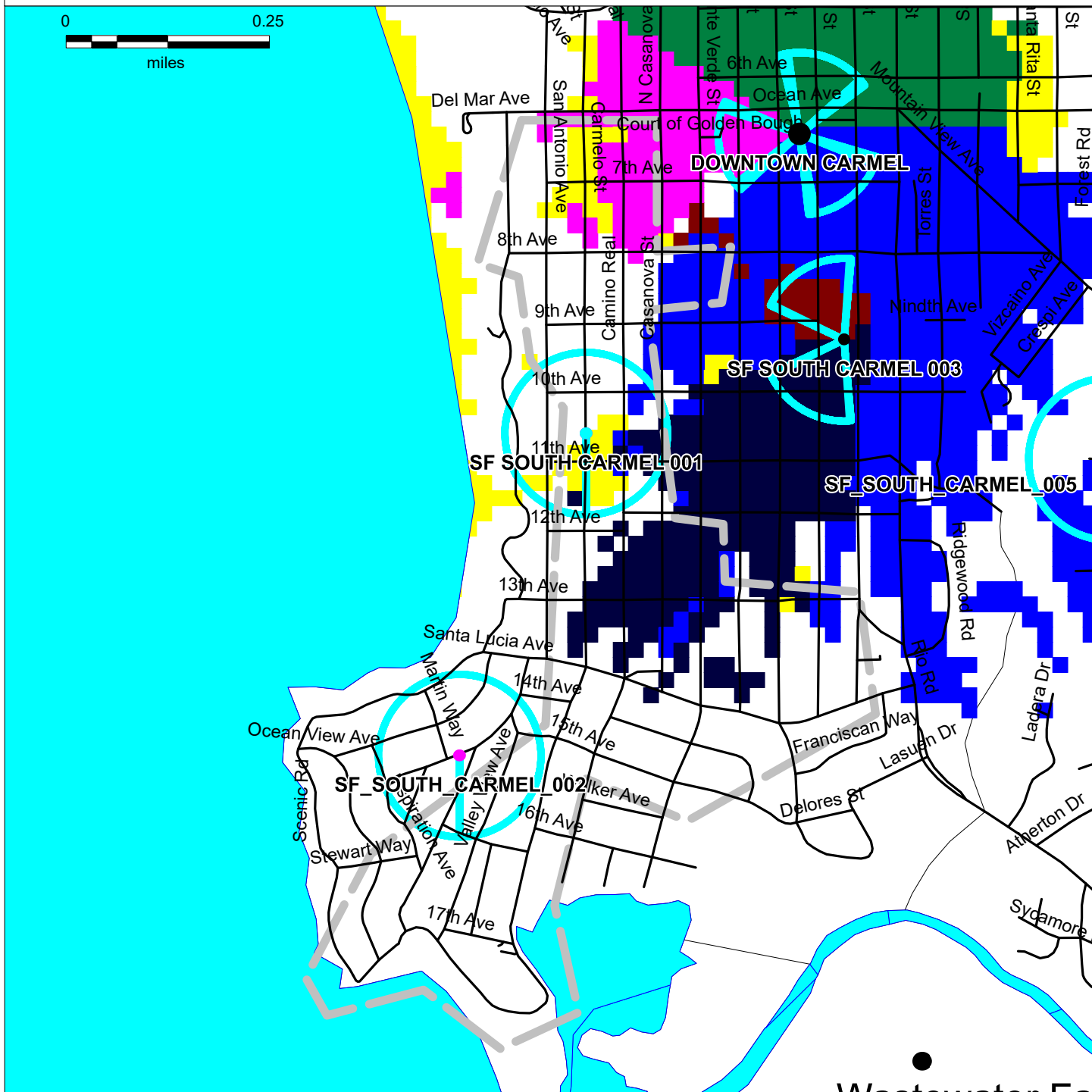


Richard Conroy  
President / Principal RF System Engineer  
PierCon Solutions, LLC  
January 30, 2025



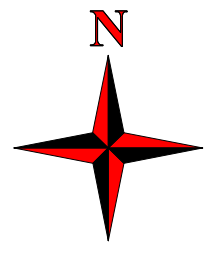
Ronald Lukach  
Senior RF Engineer  
PierCon Solutions, LLC  
Date: January 30, 2025

# VERIZON WIRELESS BEST SERVING TRANSMITTER IN AREA OF GAP

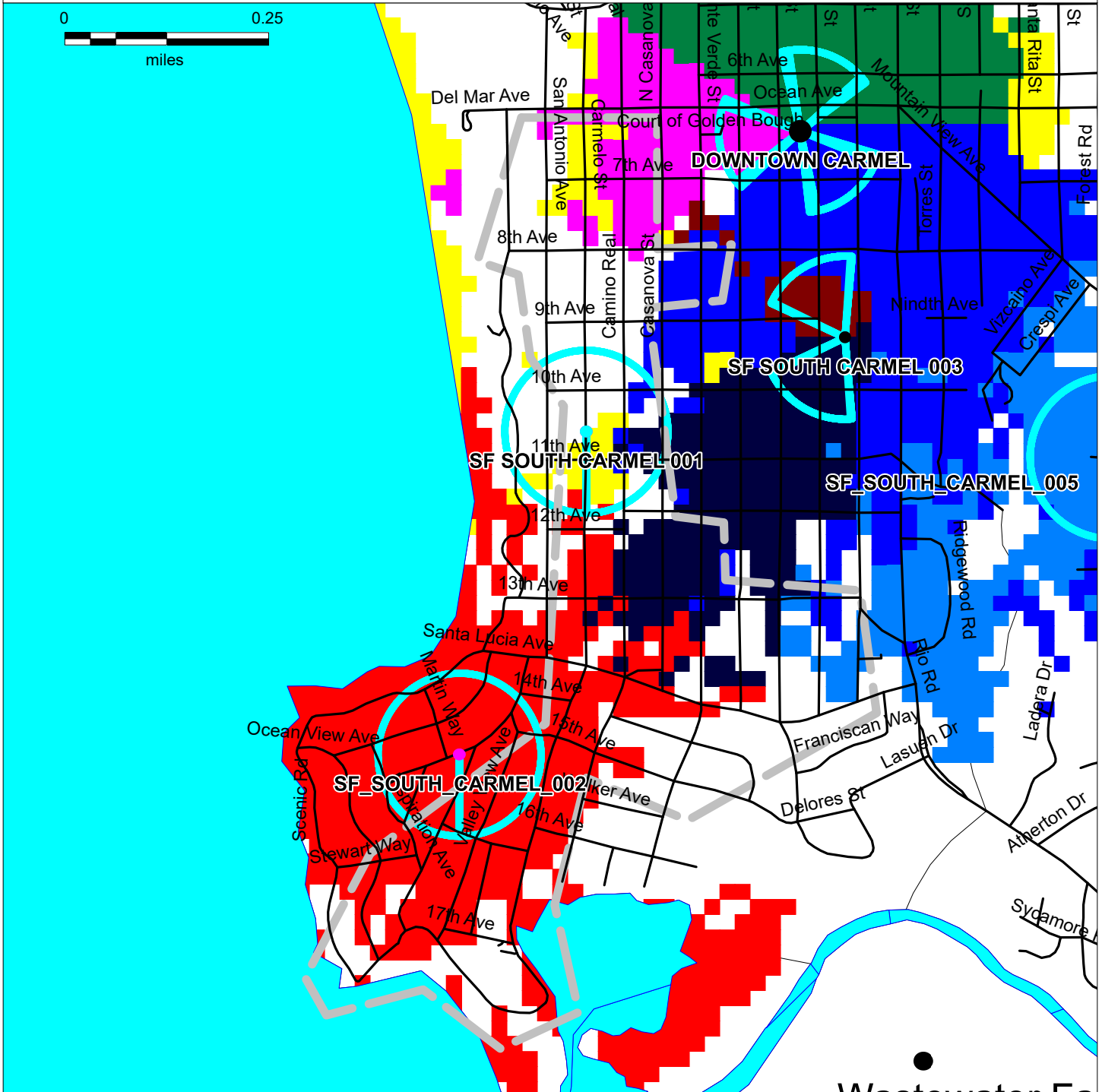


- Existing On Air Site
- Approved Site
- Proposed Site
- Site sectors
- Mid-Band Gap  
0.27 Square Miles

- Mid Band - Best Serving Transmitters (-95 dBm)
- Downtown Carmel-Alpha
  - Founders Building-Beta
  - Downtown Carmel-Beta
  - Downtown Carmel-Gamma
  - SF-003-Alpha
  - SF-003-Beta

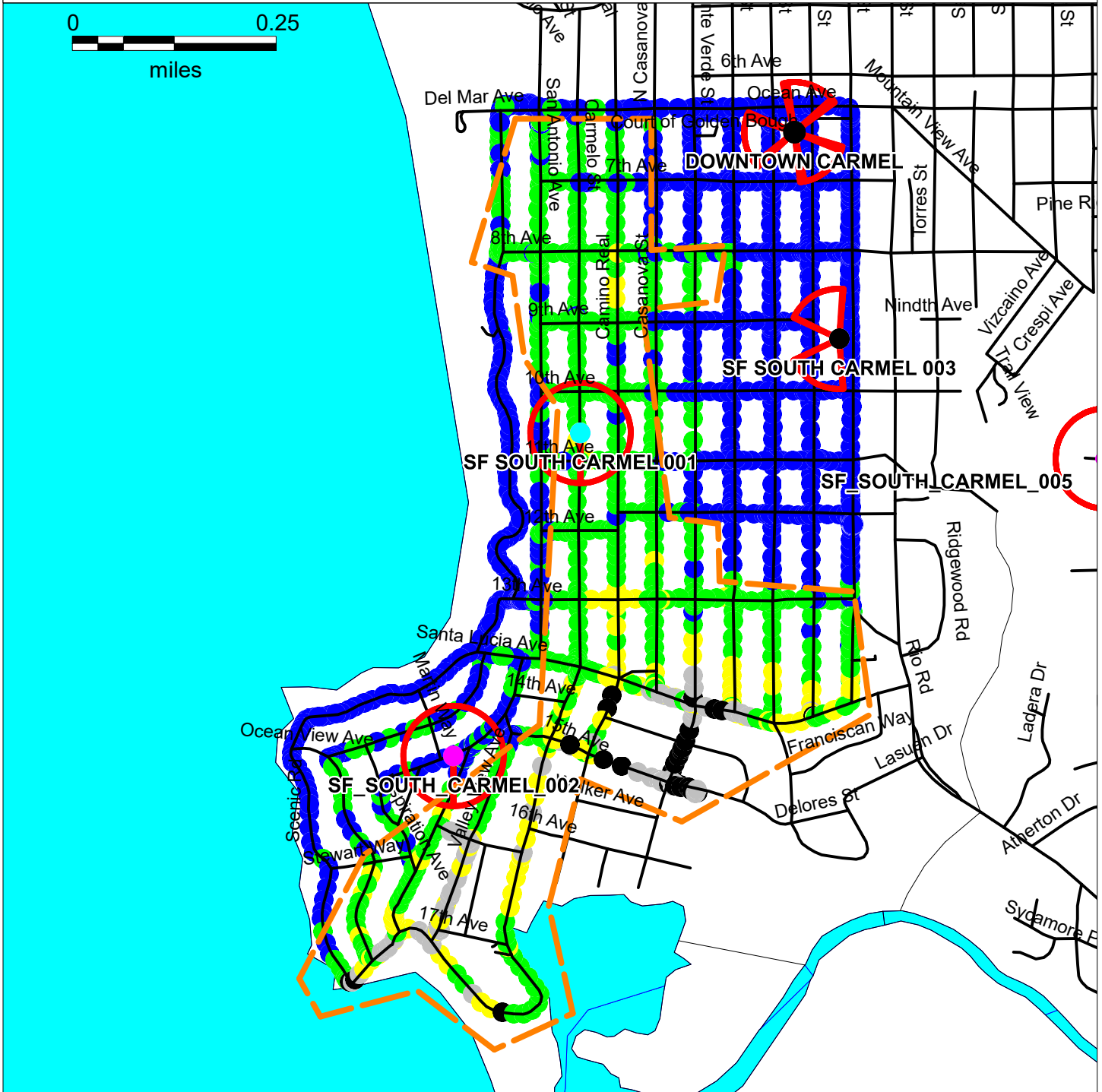


# VERIZON WIRELESS BEST SERVING TRANSMITTER IN AREA OF GAP



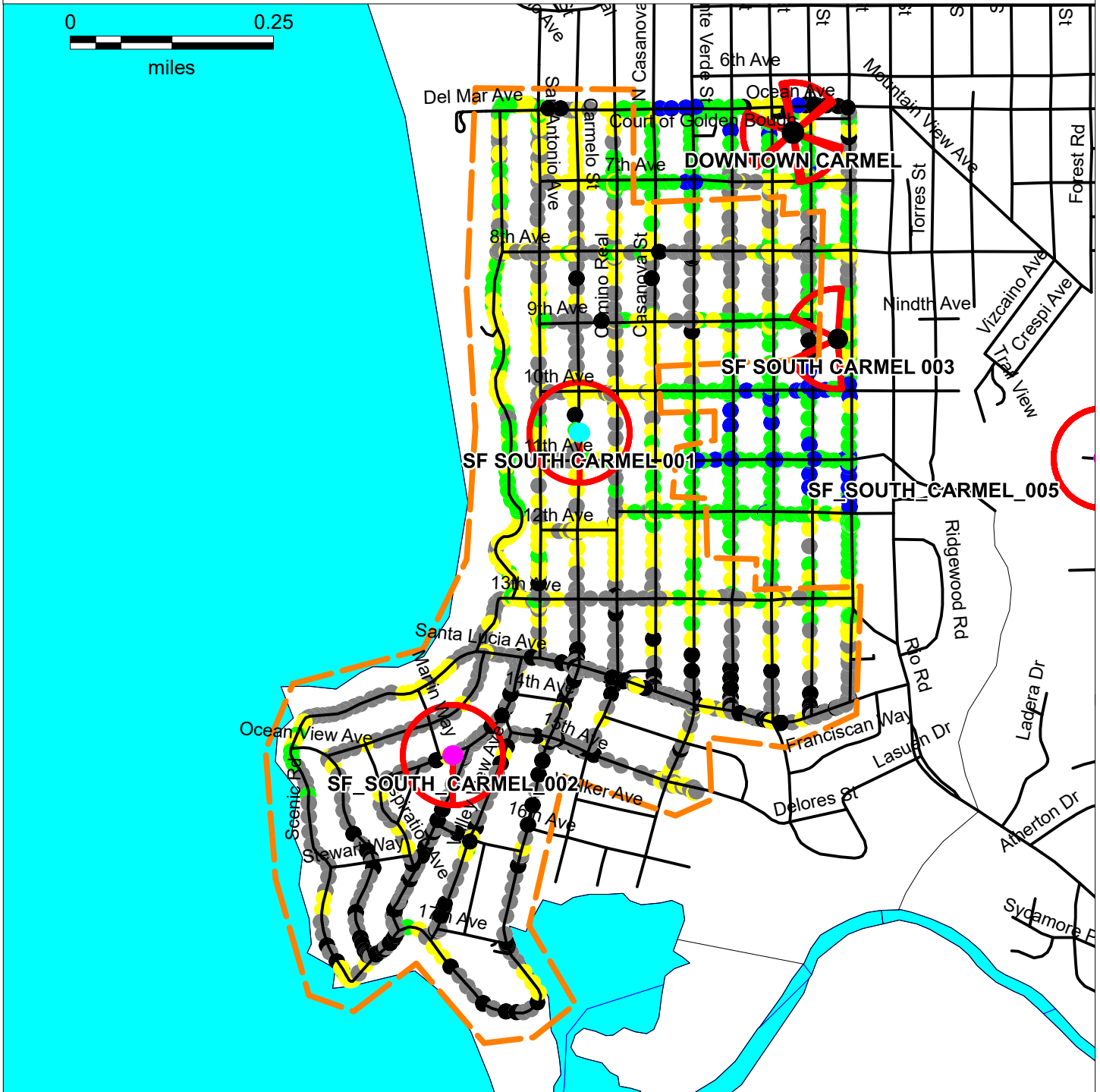
● Existing On Air Site	<u>Mid Band - Best Serving Transmitters (-95 dBm)</u>	
● Approved Site	■ Downtown Carmel-Alpha	■ Founders Building-Beta
● Proposed Site	■ Downtown Carmel-Beta	■ SF-002
★ Site sectors	■ Downtown Carmel-Gamma	■ SF-005
□ Mid-Band Gap 0.27 Square Miles	■ SF-003-Alpha	■ SF-003-Beta

# VERIZON WIRELESS 2100 MHz MID BAND - ON AIR DRIVE (SCAN TEST) DATA TESTED 2/19/2025



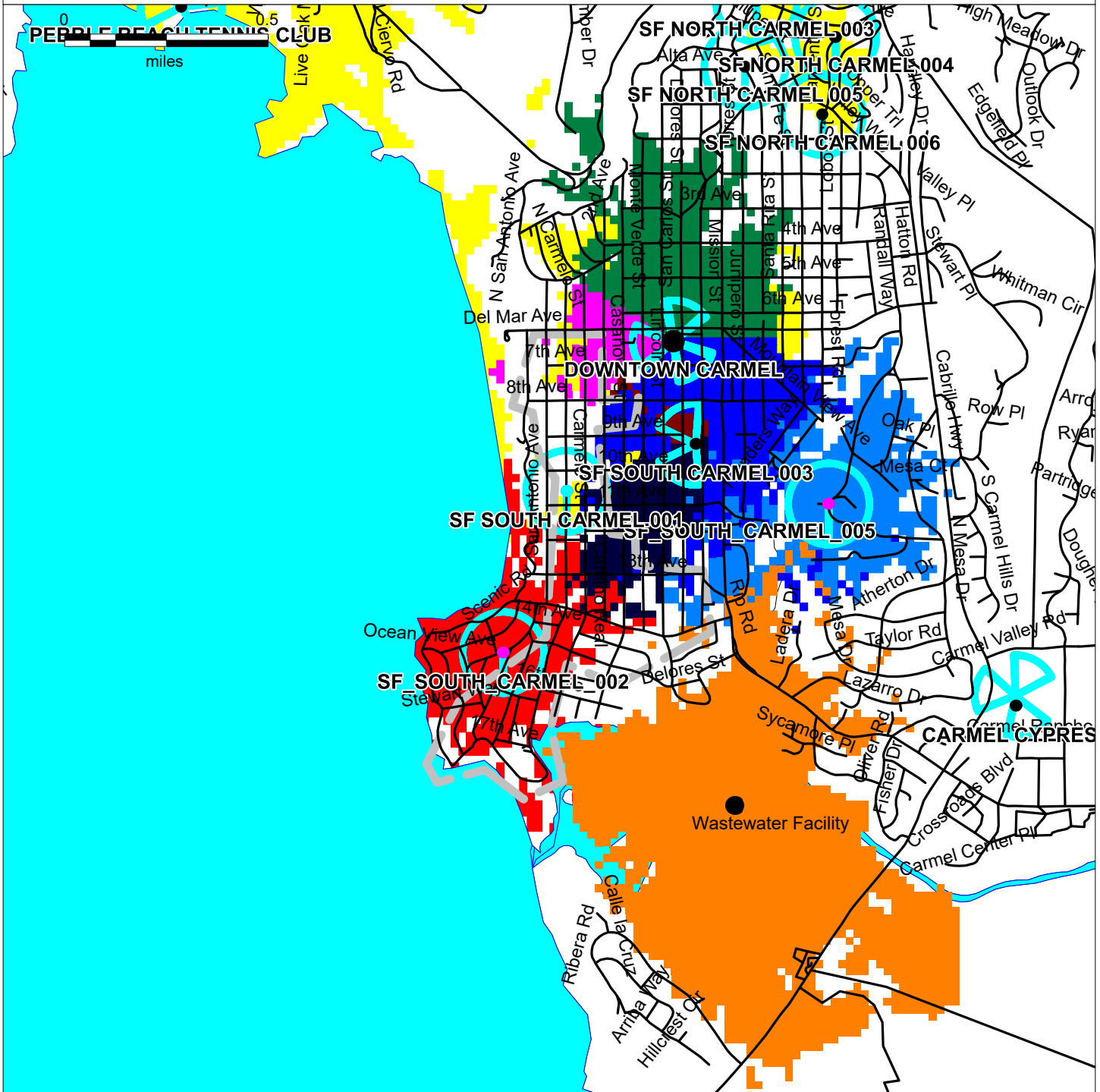
<ul style="list-style-type: none"> <li>● Existing On Air Site</li> <li>● Approved Site</li> <li>● Proposed Site</li> <li>⊗ Site sectors</li> <li>⊡ Mid-Band Gap 0.27 Square Miles</li> </ul>	<p><u>Drive Test RSRP Signal Level (dBm)</u></p> <ul style="list-style-type: none"> <li>● -95 ≤ X Minimum Threshold (48%)</li> <li>● -105 ≤ X &lt; -95 (36%)</li> <li>● -110 ≤ X &lt; -105 (8%)</li> <li>● -115 ≤ X &lt; -110 (7%)</li> <li>● -150 ≤ X &lt; -115 (2%)</li> </ul>	
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# VERIZON WIRELESS 700 MHz LOW BAND - ON AIR DRIVE (SCAN TEST) DATA TESTED 2/19/2025



<ul style="list-style-type: none"> <li>● Existing On Air Site</li> <li>● Approved Site</li> <li>● Proposed Site</li> <li>✕ Site sectors</li> <li>▭ Low Band Gap 0.43 Square Miles</li> </ul>	<p><u>Drive Test SINR Signal Level (dB)</u></p> <ul style="list-style-type: none"> <li>● <math>x &gt; 20</math> Very Good High data rates, efficient use of spectrum (3%)</li> <li>● <math>10 &lt; x \leq 20</math> Good Stable, decent throughput (24%)</li> <li>● <math>5 &lt; x \leq 10</math> Fair Limited speeds, frequent retransmissions (30%)</li> <li>● <math>0 &lt; x \leq 5</math> Poor Low throughput (33%)</li> <li>● <math>x &lt; 0</math> Very Poor Drop connections or no service(10%)</li> </ul>	
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# VERIZON WIRELESS BEST SERVING TRANSMITTER IN AREA OF GAP

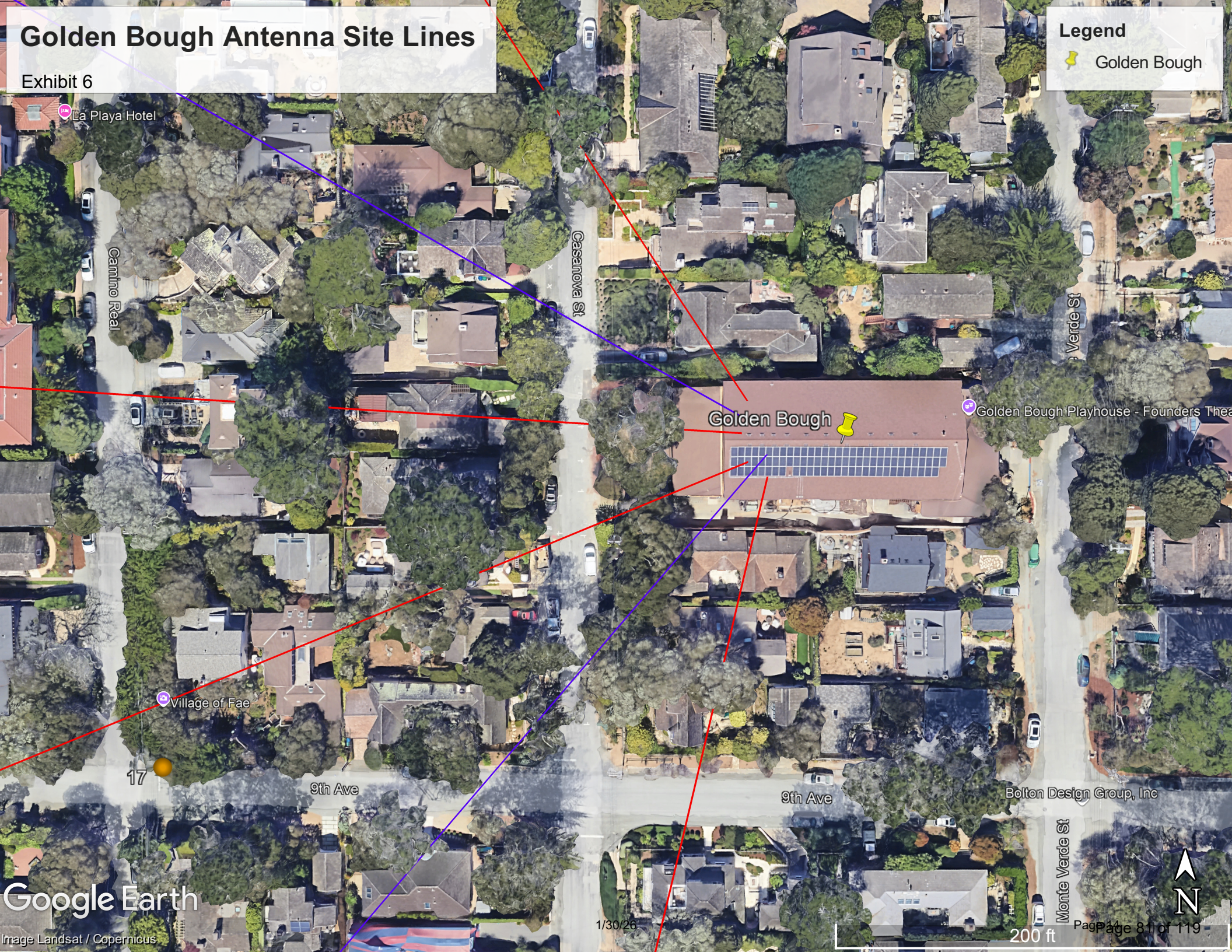


● Existing On Air Site	<u>Mid Band - Best Serving Transmitters (-95 dBm)</u>	
● Approved Site	■ Downtown Carmel-Alpha	■ Founders Building-Beta
● Proposed Site	■ Downtown Carmel-Beta	■ SF-002
✦ Site sectors	■ Downtown Carmel-Gamma	■ SF-005
⊠ Mid-Band Gap 0.27 Square Miles	■ SF-003-Alpha	■ Wastewater Facility
	■ SF-003-Beta	

# Golden Bough Antenna Site Lines

Exhibit 6

**Legend**  
Golden Bough



La Playa Hotel

Camino Real

Casanova St

Verde St

Golden Bough

Golden Bough Playhouse - Founders Theatre

Village of Fae

17

9th Ave

9th Ave

Bolton Design Group, Inc

Monte Verde St

Google Earth

Image Landsat / Copernicus

1/30/26

200 ft





**TRSRenTelco**

1830 West Airfield Drive  
DFW Airport, Texas 75261

# Calibration Certificate Traceability Statement

**Asset Number:** 1281812  
**MFG/Model Number:** PCTEL/IBFLEX-5GNR;B  
**Serial Number:** 82207003  
**Description:** SCANNER  
**Customer:** PIERCON SOLUTIONS, LLC  
**Address:** 6 MAPLE COURT DOCK  
 BUTLER NJ 07405  
  
**Customer P.O. No:** 250207RL-2  
**Rental Agreement Number:** 1920365-0  
**Certificate Number:** 192036501281812241115

This certificate applies to the instrument identified above and shall not be reproduced, except in full, without written approval of TRS-RenTelco.

This certifies that the above instrument was calibrated to manufacturer's specifications using approved procedures and traceable measurement standards.

This calibration was performed by TRS-RenTelco, located at 1830 West Airfield Drive DFW Airport, TX 75261.

The Quality System of TRS-RenTelco is registered by DQS Inc. Certificate Number 10000112 to the Quality Management System Standard ISO 9001:2015. TRS-RenTelco's Laboratory is in compliance with MIL-STD-45662A, ANSI/NCSL Z540.1-1994, ANSI/NCSL Z540.3-2006, ISO/IEC 17025:2017 and ISO 10012-2003.

Measurement standards are calibrated at planned intervals. Traceability is to the International System of Units (SI) through the National Institute of Standards and Technology (NIST) or other recognized National Metrology Institute (NMI), natural physical constants, consensus standards, or by ratio type measurements using self calibrating techniques. Supporting documentation relative to traceability is available for review by appointment.

Although the calibration laboratory is in compliance with ANSI/NCSL Z540-1-1994 and MIL-STD-45662A this calibration certificate is issued only as a Traceability Statement and does not carry the requirement of recalibration at the end of rental and customer notification of Out of Tolerance conditions.

When provided, TRS-RenTelco utilizes the Manufacturer's recommended calibration interval as the basis for establishing calibration due dates. This calibration due date is for guidance only. To determine the actual date calibration is due, customers should use an interval that satisfies their own organizations internal Quality System requirements.

**Conditions of calibration are as follows:**

<b>Temperature:</b> 23 ° C	<b>Relative Humidity:</b> 33%
<b>Calibration Procedure:</b> CS900877	<b>Calibration Date:</b> Nov 15, 2024
<b>Calibrated By:</b> RODNEY REYES	<b>Calibration Due Date:</b> Nov 15, 2026

**Condition:**  **As-Shipped**  **In-Tolerance**

**Quality Assurance:** 

Peel Off Sticker Here ---> **TRS-RenTelco** 800-621-6354  
 ID: 1281812 Date: 11/15/24  
 REYESRO Due: 11/15/26



**TRSRenTelco**

1830 West Airfield Drive  
DFW Airport, Texas 75261

# Calibration Certificate Traceability Statement

**Asset Number:** 1281812  
**MFG/Model Number:** PCTEL/IBFLEX-5GMR;B  
**Serial Number:** 82207003  
**Description:** SCANNER  
**Customer:** PIERCON SOLUTIONS, LLC  
**Address:** 6 MAPLE COURT DOCK  
 BUTLER NJ 07405  
  
**Customer P.O. No:** 250207RL-2  
**Rental Agreement Number:** 1920365-0  
**Certificate Number:** 192036501281812241115

## Laboratory Standards

MFG/MDL	Description	Asset	Cal. Type	Cal. Date	Due Cal
KT/N5181B-506	6 GHz MXG Analog Signal Generator	1143275	CAL	Aug 28, 2024	Aug 28, 2026
SPECTRA/GSG-5	4 Channel Advanced GNSS tester	1191356	CAL	May 30, 2024	May 30, 2026
R&S/NRP8S	3-Path Diode Sensor	1208595	CNC	Jan 17, 2024	Jan 17, 2026

Peel Off Sticker Here --->

**TRSRenTelco** 800-621-6354  
 ID: 1281812 Date: 11/15/24  
 REYESRO Due: 11/15/26

## Verizon Wireless’s Responses Volume 1

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2. Gap	1
3. Design	3
4. Location	4
5. Property Values	5
6. Environmental Review	6

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### 1. COMPLIANCE WITH CODE REQUIREMENTS

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**Project opponents have claimed that the proposed facility does not comply with the Code.**

The City adopted a new wireless ordinance in the Carmel-by-the-Sea Municipal Code (the “Code”) and *Administrative Detailed Wireless Facility Design Guidelines* (the “Guidelines”) in September 2023. The California Coastal Commission certified the Code in June 2025. Verizon Wireless studied the detailed Code and Guidelines over several years to develop an application that could comply with as many provisions as possible, given the voluminous restrictions and constraints presented by the regulations and site conditions in the City.

As described in the City’s Planning Staff in its January 21, 2026, Staff Report regarding DR 25313 & UP 25314 Verizon Sequoia Deployment (the “Staff Report”), Verizon Wireless submitted its application materials on October 15, 2025, and responded substantively to two completeness review letters. Staff Report, pp. 80-82. Those materials, including drive test data, are available on the City’s website.

Planning Staff have concluded that the proposed facility complies with the Code and Guidelines with the addition of the two special exceptions requested. Staff Report, pp. 91-97, Attachment (“Att.”) 9, p. 271. CTC Telecommunications Network Consulting, the City’s consultant, has similarly confirmed compliance with the Code and Guidelines with respect to their areas of expertise.

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### 2. GAP

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**Commissioners asked why the marketing maps available on Verizon Wireless’s website and the FCC’s National Broadband maps show 4G service in Carmel, but the PierCon and CTC reports state that current service is inadequate.**

Marketing maps are of limited applicability to small cell network design. Verizon Wireless’s marketing maps do not take into consideration factors such as network changes, call traffic volume, technical limitations, changing handset capabilities, structures, foliage, and other conditions that may interfere with actual service at any point in time to the same detailed extent as Coverage Maps generated by system design tools. Additionally, they do not account for interference, signal to noise ratios, nor capacity. All these factors were considered in the site-specific drive tests and professional network design tools that PierCon used to demonstrate the gap.

Verizon Wireless’s marketing maps explicitly include a disclaimer stating: “This map shows approximate outdoor coverage and is not a guarantee of service. Actual coverage may vary and is subject to change.”<sup>1</sup> In contrast, Verizon Wireless’s coverage maps provided with the application show in-building coverage as well as in-vehicle and outdoor coverage. The marketing map does not account for the precise coverage mapping and network capacity analyses that Verizon Wireless engineers use to design networks.

Courts routinely reject efforts to use marketing maps to rebut the existence of a service gap. *Los Angeles SMSA Limited Partnership v. City of Los Angeles*, 2021 WL 3741539 (C.D. Cal. 2021), at \*12-13 (holding that map on Verizon website showing “excellent coverage” was not sufficient to overcome professional coverage maps and drive tests); and *T-Mobile West Corp. v. City of Huntington Beach*, 2012 WL 4867775 (C.D. Cal. 2012), at \*12-13 (maps provided to customers on T-Mobile’s website are “not as detailed as the Propagation Maps or Drive Test Maps that T-Mobile uses to plan network integrity and expansion,” and should not be used to determine whether a coverage gap exists).

Similarly, the FCC’s National Broadband Map<sup>2</sup> is not a network design tool, but rather a federal initiative that identifies underserved communities that need funding for internet infrastructure. Based on the map data, the federal government provides funds to various states, which in turn award grants to internet companies to enhance their networks in underserved communities. The National Broadband Map shows only data for “outdoor stationary coverage and in-vehicle mobile coverage.” However, lack of in-building coverage also proves the existence of a significant gap. *T-Mobile W. Corp. v. City of Agoura Hills*, 2010 WL 5313398 (C.D. Cal. Dec. 20, 2010), at \*8 (“a gap in a provider’s in-home coverage that consists of more than a few isolated pockets of inadequate in-home coverage suffices to show a significant gap exists”); *MetroPCS Inc. v. City and County of San Francisco*, 2006 WL 1699580 (N.D. Cal. 2006), at \*10 (“any [significant gap] analysis should include consideration of a wireless carrier’s in-building coverage”); *Los Angeles SMSA, supra*, at \*8-10 (finding gaps in in-building coverage significant); *T-Mobile W. Corp., supra*, at \*6 (finding a significant gap measured by a lack of reliable in-building residential and in-vehicle coverage).

Additionally, courts have held anecdotal experience testimony of neighbors stating that they did not experience coverage issues is not probative of the existence or significance (or lack thereof) of a coverage gap. *Los Angeles SMSA, supra*, at \*9 (“The fact that approximately thirty individuals who strongly oppose the construction of the proposed Facility have submitted declarations stating they enjoy good coverage and are satisfied with Verizon’s existing service is neither statistically nor scientifically meaningful and is insufficient to demonstrate there is no significant gap of coverage within the relevant geographic area.”).

**Opponents claim the effective prohibition standard doesn’t include broadband (e.g., fixed wireless).**

This claim is false, as Verizon Wireless’s network provides information services through its wireless facilities, which will include the proposed facility. These information services include wireless broadband, mobile data networks, and connection to the internet, which Verizon Wireless provides using the same infrastructure as its personal wireless services. Voice and data services are commingled.

Planning Staff “confirmed with the city’s special counsel that 47 USC Section 332(c)(7) applies to personal wireless facilities used to provide commingled wireless services (both telephone and broadband/data)” and

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<sup>1</sup> Available at: [www.verizon.com/coverage-map](http://www.verizon.com/coverage-map).

<sup>2</sup> Available at: <https://broadbandmap.fcc.gov/home>.

that “that the city cannot require wireless providers to only use their facilities to provide telecommunications services and not commingled services.” Staff Report, p. 81.

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### 3. DESIGN

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**We received questions about whether the pole must be replaced, criticisms regarding equipment spacing and placement, and whether the proposed facility can be undergrounded.**

PG&E dictates that poles older than 40 years with new wireless attachments need to be replaced. The proposed pole was installed in 1955, making it more than 70 years old. PG&E also dictates where the equipment must be placed on the pole. See, e.g., PG&E Standard 027911. PG&E no longer allows pole extensions to be added to the top of the pole, so they prescribed a taller replacement pole for this site to allow for the required equipment spacing and to comply with safety standards. Not only does PG&E have to accommodate other pole owners and equipment, it must also comply with its own safety rules and those of the California Public Utilities Commission (“CPUC”). Neither Verizon Wireless nor the City can circumvent PG&E and CPUC safety standards.

Undergrounding wireless is also infeasible. Verizon Wireless has explored this possibility with the City for nearly 10 years. Undergrounding equipment would require the construction of a sidewalk with a concrete curb and gutter to direct water away from the underground vault. Vaults require dewatering and ventilation systems. Furthermore, key equipment, such as the antenna, vent stacks, meter pedestal, and bollards, would still have to be placed above ground to serve their respective functions. For instance, PG&E requires metering equipment to be mounted on the same pole as the PG&E service. PG&E Standard 027911, §10. Clear and level working space is required in front of the meter. PG&E Standard 027911, §§20, 21. If a carrier cannot place a meter on the pole because the equipment is not on the pole, the carrier must install a pad-mounted pedestal meter. PG&E Standard 027911, §11 and §B-B on p. 10. PG&E would require the carrier to install bollards to protect someone reading the meters from traffic. *PG&E Clearances and Location Requirements For Enclosures, Pads, and Underground Equipment*, Document 051122 Rev #22, March 25, 2022 (“General Greenbook 051122”), §12; PG&E Greenbook §§5.4.4-5.4.5. In addition to being more intrusive, the space required for the bollards would likely result in the removal of at least one street parking space. *Id.*

Consequently, undergrounding the portions of a wireless facility would require that accessory equipment (an electric meter) be placed in a surface-mounted meter pedestal. The addition of the bollards and pedestal meter could be considered to obstruct views and add unnecessary visual clutter to the right-of-way.

**We were asked about compliance with the Code’s height limit and impacts to the adjacent oak tree.**

PG&E will replace the existing 38-foot, 11-inch utility pole with a new 46-foot, 4-inch pole. Staff Report, Att. 2, p. 118. When the antenna is installed on the new pole, the total facility height will be 49 feet, 10 inches, increasing the height of the existing pole by 10 feet, 11 inches. *Id.* The Code and Guidelines allow for this height at this location, since they allow a height increase of up to “10 feet above the height of the replaced pole or existing poles in the vicinity *unless additional height is necessary to comply with CPUC safety standards such as General Order 95.*” Code §17.46.040(F)(1)(b) (emphasis added); Guidelines Section II(A)(1). As Planning Staff explained at the hearing, wireless facilities mounted on electric utility poles are subject to stringent safety requirements of California Public Utilities Commission General Order 95, including required clearances mandating that antennas and their mounting hardware be elevated at least six feet above electric

conductors. General Order 95 Rule 94.4. Consequently, the pole height is just slightly more than ten feet to ensure compliance with General Order 95's six-foot clearance requirement.

As previously stated, PG&E will place the replacement pole in the footprint of the existing pole. A PG&E arborist will inspect the site prior to any construction activity to determine the scope of the project. Planning Staff confirmed that proposed facility with the tree and landscaping requirements. Staff Report, p. 87. In addition, Special Condition No. 3 requires Verizon Wireless to "provide a landscape management plan for any work proposed on the adjacent tree or surrounding public right-of-way" prior to the issuance of a building permit. Staff Report, Att. 1, p. 111. Condition of Approval 10 requires Verizon Wireless to "hire and pay for a licensed arborist to select plant and maintain replacement landscaping in an appropriate location for the species. Any replacement tree must be substantially the same size as the damaged tree or as otherwise approved by the City." Staff Report, Att. 1, pp. 103-104.

**The public asked about the feasibility of potential future collocations on this pole by other carriers and the potential impacts to radiofrequency emission safety as a result of those collocations.**

As a preliminary matter, Condition of Approval No. 2 states that the permittee "shall be willing to allow other carriers and site operators to collocate transmission equipment . . . whenever technically feasible and aesthetically desirable in accordance with applicable provisions in the City's Municipal Code." Staff Report, Att. 1, p. 102.

However, it is unlikely that another would collocate on this pole for several reasons. First, the new carrier and Verizon Wireless's antennas would have to be located far enough apart so as not to create interference with each other's signal. It is unlikely that both PG&E and the City would approve a height increase big enough to accommodate both carriers. PG&E has its own regulations, and it also must comply with the California Public Utilities Commission's regulations. Next, the new carrier would have to place its equipment on the ground because there are only certain quadrants and heights on the pole on which PG&E allows wireless carriers to place equipment. Placing the equipment on the ground would likely cause greater aesthetic impacts. It would simply be easier for them to place their facility on a new pole.

With respect to whether the aggregate impact of two small cell facilities on the same pole would exceed the FCC's exposure thresholds depends upon the new carrier's choice of equipment. Any addition of equipment to the wireless facility will require a radio frequency exposure analysis confirming compliance with FCC's exposure guidelines. In any event, no modification could be made that would exceed the FCC's exposure thresholds.

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#### **4. LOCATION**

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**Project opponents complain that the proposed facility is in the public right-of-way of an R-1 zone, adjacent to a City-inventoried historic home.**

The gap area requiring service is in a residential zone, and the surrounding area is also residential. Staff Report, Att. 7, p. 225; Att. 8, p. 243. Consequently, the proposed small cell needs to also be in the residential area to provide service. As explained in the Verizon Wireless Alternatives Analysis, a wireless facility on a private residential parcel in the area, even if one were available, could not meet the Code's and Guidelines' height and setback requirements. Staff Report, Att. 8, pp. 245-246. Both Planning Staff and CTC confirmed that there are "no technically feasible and viable private parcel locations for placement," leaving only the public right-of-way. Staff Report, p. 83; Att. 10. The proposed facility also meets the public right-of-way location safety

considerations in the Code (Staff Report, p. 85), as well as the Guidelines for Facilities in the Public-Right-of-Way. Staff Report, pp. 89-90.

While the home directly to the east of the proposed facility is on the Carmel Inventory of Historic Resources, the proposed facility is not in a “location in the public right-of-way that would trigger review of consistency with the Secretary of the Interior’s standards for potential impacts to a historic resource on a residential parcel in any Tier I zone in subsection (B) of this section.” Code § 17.46.040(E)(1)(b). The closest residential window at the adjacent house is more than 23 feet away from the existing pole, and the pole is more than eight feet from the adjacent property line. Staff Report, Att. 2 at 114-115. Planning Staff confirmed that the proposed facility is not in a location that would trigger Secretary of the Interior’s review. Staff Report, p. 84. The Secretary of the Interior Standards address preservation, rehabilitation, restoration, or reconstruction of a historic property. 36 C.F.R. §§ 68.2, 68.3. Verizon Wireless is only slightly modifying an existing utility pole in the public right-of-way. Furthermore, there is no review by the City Historic Resources Board because the proposed small cell is not “within a historic district or within the boundaries of an historic property.” Code § 17.32.220.

**Project opponents complain that the proposed facility will cause adverse visual impacts.**

The City’s streets are already lined with utility poles supporting utility lines, transformers, and other utility equipment. For example, a utility pole due south on 11th & Carmelo supports a large, wide utility cabinet and an adjacent ground-mounted cabinet. The utility poles in the City’s right-of-way are not uniform. The equipment they host varies, as well as the heights, which range between roughly 25 feet to 50 feet above grade. The proposed facility will not be an anomaly. The Code and Guidelines state that wireless facilities should not “*significantly* impair public or private views” and should be “designed to preserve *significant* coastal views from the public right-of-way.” Guidelines, § II(B)(1); Code § 17.46.040(F)(1)(k) (emphasis added). The Code even states “[t]he protection of public views should not prevent reasonable development of the site” and wireless facilities “should not present excess visual mass or bulk to public view or to adjoining properties.” Code § 17.46.040(F)(1)(k) (emphasis added). Furthermore, “[w]ireless communications facilities, to every extent possible, should be sited to not create visual clutter or negatively affect important public or private views . . .” *Id.*

As described throughout the application, Verizon Wireless has made every effort to make the proposed facility as discrete as possible by minimizing the bulk and height. It is proposed for an existing pole, which will be replaced, rather than a new stand-alone pole, minimizing the amount of street furniture in the public right-of-way. All equipment and cables will be shrouded to blend in with the pole. Even the photos submitted by opponents from nearby residences confirm that the adjacent tree, trimmed to one foot of the equipment shroud, will provide screening or a backdrop, depending on the vantage point. The antenna would be viewed against the sky, and would not impact the view of nearby buildings, hills, or the ocean. The proposed facility is also subject to special conditions of approval which require the facility to be painted in matte, non-reflective paint to match the color of the PG&E utility pole and the applicant to supply a landscape management plan for any work proposed on the adjacent tree or surrounding public right-of-way. Staff Report, Att. 1 at 111.

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**5. PROPERTY VALUES**

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**Opponents claim that the proposed facility will decrease property values in the area.**

Opponents speculate that the proposed facility would decrease property values in the vicinity, stemming from misplaced fears of radio frequency emissions. General concerns about property values or aesthetics do not constitute substantial evidence to support denial of a permit to install a wireless telecommunications facility.

*Calif. RSA No. 4, d/b/a Verizon Wireless v. Madera County*, 332 F. Supp. 2d 1291, 1308-1309 (E.D. Cal. 2003) (generalized concern on the effect on property values or aesthetics fail to meet the substantial evidence threshold) (citing *Omnipoint Corp. v. Zoning Hearing Bd.*, 181 F.3d 403, 409 (3d Cir.1999); *Cellular Telephone Co. v. Town of Oyster Bay*, 166 F.3d 490 (2nd Cir. 1999)). Given federal preemption over radio frequency emissions, “direct or indirect concerns over the health effects of RF emissions may not serve as substantial evidence to support the denial of an application.” *AT&T Wireless Servs. of Cal. LLC v. City of Carlsbad*, 308 F. Supp. 2d 1148, 1159 (S.D. Cal. 2003); *Calif. RSA No. 4, supra*, 332 F. Supp. 2d at 1311. Opponent speculation here about property values is premised on fears of radio frequency emissions, so it cannot be considered. In any event, speculation that wireless facilities diminish property values is unfounded.

In 2012, the Joint Venture Silicon Valley Network studied the impact of wireless facilities on property values.<sup>3</sup> They partnered with the Santa Clara County Association of REALTORS and the Silicon Valley Association of REALTORS (SILVAR) to study over 1,600 single family home transactions and concluded that “the distance from a wireless facility has no apparent impact on the value or sale price of a home.”

The most relevant study to this site addresses small cell wireless facilities in an equivalent northern California market. The Joint Venture Silicon Valley Network’s 2021 study, *Economic Impacts to Residential Real Estate from Small Wireless Facilities* found that “[a]t an aggregate statewide level. . . statistically significant increases in residential real estate valuation at all distances after construction of the proximal wireless sites.”<sup>4</sup> It also debunked the foundational study, from which many of the opponents’ studies stem, which was based in New Zealand. The Joint Venture Silicon Valley Network found that the “oft-cited 20% reductions in valuation are not evident in the statewide analysis, nor in any of the metropolitan region analyses.” *Id.* at p. 6.<sup>5</sup>

One opponent at the hearing claimed that the National Association of Realtors conducted a survey concluding that wireless facilities decrease property values. We have not found any such survey.<sup>6</sup> We have only found an informational page stating that at ground level near cell phone towers, “the level of radio frequency waves is much lower than limits for safe exposure.”<sup>7</sup> Others rely on a discredited study discussed above. That study does not consider the small cell facilities contemplated in this application.

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## 6. ENVIRONMENTAL REVIEW

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### **Project opponents claim that the proposed facility does not qualify for a CEQA exemption.**

<sup>3</sup> Available at <https://jointventure.org/images/stories/pdf/WirelessFacilitiesImpactOnPropertyValues.pdf>.

<sup>4</sup> Available at: <https://jointventure.org/images/stories/pdf/cell-real-estate-study-2021-07.pdf> and attached as Exhibit A.

<sup>5</sup> The source of this number is from an article in *The Appraisal Journal*, (Summer 2005) authored by Sandy Bond, Ph.D. and Ko-Kang Wang that “asserted wireless towers could result in a 20% reduction in residential real estate valuations.” *Id.* at p. 10. This article has largely been discredited because Bond and Wang used surveys to collect data, when surveys are “subject to respondent bias, participation bias, sampling bias, and a host of other factors.” *Id.* Joint Venture Silicon Valley Network found “evidence that Dr. Bond was consulting in 2005 for the Porirua Residents’ Action Group in Wellington, NZ, and that this group was actively opposed to wireless tower deployments in the area.” *Id.*

<sup>6</sup> The 2021 Joint Venture Silicon Valley Network study, on page 12, observes that the National Association of Realtors links to *The Impact of Cell Phone Towers on House Prices: Evidence from Brisbane, Australia* (Environmental Economics and Policy Studies, Jan. 1, 2018) behind a member registration wall, which was posted by an anti-EMF activist group that cites Bond/Wang 2005.

<sup>7</sup> Available at <https://www.nar.realtor/cell-phone-towers#section-references>.

Planning Staff has properly determined that the proposed facility is categorically exempt from further review under the California Environmental Quality Act (Pub. Res. Code §§ 21000 *et seq.*) (“CEQA”) and CEQA Guidelines (14 Cal. Code of Regs. §§ 15000–15387). Staff Report, pp. 97-98. The use of the Class 3 exemption is well-established for a wide variety of wireless facility projects. See, e.g., *Don’t Cell Our Parks v. City of San Diego* (2018) 21 Cal.App.5th 338 (faux tree telecommunications pole in public park); *Aptos Residents Ass’n v. County of Santa Cruz* (2018) 20 Cal.App.5th 1039 (10 microcell transmitter units on existing utility poles); *Robinson v. City and County of San Francisco* (2012) 208 Cal.App.4th 950 (40 wireless equipment cabinets on existing utility poles); *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012 (726 telecommunications cabinets in the public right-of-way).

Opponents claim that the proposed facility may significantly impact a historical resource, triggering an exception. 14 Cal. Code Regs. § 15300.2(f). As discussed above in Section 4, the proposed facility will not impact a historical resource. It will replace an existing pole in the public right-of-way, not a historical property, with a slightly taller pole and wireless equipment. It will not result in the “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” 14 Cal. Code Regs. § 15064.5(b); Staff Report, Atts., 2 at 114-155 and 3 at 127-129. The proposed facility is exempt from CEQA.

# Economic Impacts to Residential Real Estate from Small Wireless Facilities

July 2021



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## Study Background

Mobile telephone and data networks have existed for several decades, dating back to the late 1960s when “car phones” were first introduced. Mass-adoption began in the late 1990s, when economies of scale and Moore’s Law<sup>[1]</sup> made affordable mobile handsets possible. The introduction of smartphones in the late 2000s drove mass adoption of mobile connectivity and applications we now rely on for daily life in the 21<sup>st</sup> century. The usage trends of these technologies are well-known and personally familiar. In 2015 the World Bank reported that 97.4% of the world’s population have cellular phone subscriptions, but only 68% have sanitation service (i.e. toilets, sewers, etc.)<sup>[2]</sup>

In the United States, over 80% of emergency calls to 911 emergency services originate from mobile phones.<sup>[3]</sup> Per the Centers for Disease Control’s bi-annual *Wireless Substitution Report* 62.5% of U.S. adults and 73.6% of U.S. children are living in households that are “wireless-only” in which they’ve replaced their wired telephones with wireless service.<sup>[4]</sup> For people under the age of 34, the wireless-only rate is nearly 80%, as an increasingly large percentage of the younger population have never owned — or even used — wired telephones. Mobile internet and data usage is also growing exponentially. Globally, in 2020, the amount of data that flowed *monthly* over mobile data networks exceeded 70 Petabytes. (A Petabyte is equal to 1,000,000 Gigabytes.)<sup>[5]</sup>

To serve this exponentially-increasing demand, wireless carriers are densifying their networks by deploying low-power augmentation sites known as “small cells” because they cover small areas close to population centers and areas where people congregate. Initially, the densification projects used enhanced 4G LTE technology, but are now shifting toward 5G NR (New Radio) to add additional capacity and features. This expansion of the network, and in particular the introduction of new technologies and spectrum bands, has met with a variety of concerns from a small but vociferous handful of residents, organizations, and even some local governments. The expressed concerns are primarily that electromagnetic fields from these wireless sites will cause health problems, negatively impact local aesthetics, or negatively affect real property valuations. It is this latter concern that our study sought to address.

## Study Goals

There are numerous studies on the impact of wireless sites on real estate valuation that used objective and reproducible methods: Joint Venture Silicon Valley 2012, Valbridge 2018, Maennig (University of Hamburg) 2010, and others.<sup>[6], [7], [8]</sup> However, previous studies focused on wide-area coverage from large towers and monopoles (known as “macro” sites) on hilltops and buildings, rather than small cells on wooden poles and street lights near residences and population centers. None of the previous objective studies found economically-significant impacts — positive or negative — to property valuations, but nevertheless there is an extant belief (or an “urban legend”) held by some real estate agents that wireless sites near residences can cause

property valuation reductions of up to 20%. A devaluation of residential real estate from proximal wireless sites does not show up in objective peer-reviewed studies, nevertheless a belief that wireless sites cause devaluation persists and is often raised as an objection during planning commission, city council, county board, and permit appeal hearings. Because the previous studies focused on macro sites, and the wireless industry's current deployment focus is on 4G and 5G small cells, the studies from JVSV, Valbridge, Maennig, etc. are challenged by appellants as not applicable to small cells. To address the gap between extant belief and evidence-based economics, our study focused on whether residential real estate valuation impacts from small cells were objectively evident in real estate sale records.

## Study Methodology

Our study applied a *spatial difference-in-differences* approach, a well-regarded economic analysis method used to estimate the impacts from proposed shopping centers, liquor stores, sports stadiums, transit centers, and other contentious land uses in and near residential areas. The study examined the question, "Do wireless small cell sites have an effect, either positive or negative, on the valuation of residential real estate?" The study also examined the question of whether or not the oft-asserted 20% reduction in property valuation appeared in the results.

The study used a dataset of 1,734 small cell sites installed in the State of California over the time period from 2010 to 2020, and a dataset of 11,684,458 real estate transactions statewide over the same ten-year period.

The study looked at residential real estate valuations for properties (the study subjects) within 10 kilometers around the constructed small cell sites, compared with residential real estate valuations for similar properties (the control group) not near small cell sites. The study looked at price variation before and after construction of the small cell sites.

Using the *spatial difference-in-differences* analysis method, effects on real estate sale prices from wireless small cell sites — if they exist — will show up as variations in sale price trajectories between properties proximal to wireless sites and the non-proximal control group properties, with variation occurring during or after the time point when the small cell sites were built.

Our study methodology also controlled for variations that could affect the sale price. Controlling for variations included, but was not limited to, defining similarities in the properties based on:

- Type of Transaction: New construction, Re-sale, REO, Foreclosure, etc.
- Property Type: Single-Family Attached, Single-Family Detached, Condo, COOP, etc.
- Number of bedrooms

- Number of bathrooms
- Number of Half Bathrooms
- Square Footage (living area)
- Garage Square Footage
- Lot Size: Number of square feet of lot
- Year Built: Original construction year
- Levels: Number of property stories
- Units: Number of units on property
- Property Condition: Any internal flag/measure of property condition
- Arm's Length: Any internal indicator of arm's length transaction
- Latitude - Property latitude in decimal degrees (ISO 6709)
- Longitude - Property longitude in decimal degrees (ISO 6709)

The wireless site dataset was provided by Verizon Wireless, and included small cell sites (both 4G and 5G) constructed between 2010 and 2020 in sixteen metropolitan regions in California:

- Sacramento, Roseville, Arden-Arcade
- San José, Sunnyvale, Santa Clara
- San Francisco, Redwood City, South San Francisco
- Oakland, Hayward, Berkeley
- Santa Rosa
- Stockton, Lodi
- Fresno
- Santa Maria, Santa Barbara
- Modesto
- Salinas, Monterey
- San Luis Obispo, Paso Robles, Arroyo Grande
- Santa Cruz, Capitola, Aptos, Watsonville
- Bakersfield
- Vallejo, Fairfield
- Visalia, Porterville
- Napa

The wireless site dataset defined the latitude and longitude of the site, the date of construction, and the type of attachment structure i.e. wood pole, street light, etc.

The real estate transaction dataset was provided by Black Knight Data & Analytics, LLC, and included all residential real estate transactions in California between the years 2010 and 2020. Extensive and detailed coding of the properties in the dataset enabled accurate comparisons between sales of the study properties and sales of control group properties.

Both the wireless and real estate datasets were provided to a doctoral-level economist skilled in urban planning, policy, land use, and housing. The economist was directed to conduct the analysis objectively. The economist had no contact with the wireless industry before or during the study, and has no previous or current financial relationship with the wireless industry. The analysis was done using the Stata software package from StataCorp LLC. The economist produced a set of statistical coefficients appropriate for a third-order curve analysis of residential real estate sales near wireless sites ranging out to 10 kilometers (32,808 feet) radial distance. The analysis used radial increments of 0.1 kilometers (328 feet). The economist also calculated a coefficient of determination (denoted as  $R^2$ ) which indicates how well the data fits to the calculated regression line. The analysis was conducted at the aggregate statewide level, and also at the local level for the aforementioned metropolitan regions. No adjustments were made to the real estate dataset by the Joint Venture Silicon Valley or the economist.

The coefficients and analysis results were in turn provided to Joint Venture Silicon Valley for final authorship of this report. Aside from formatting the results as necessary for report authorship production, no adjustments were made to the analysis results.

## Study Findings

### Statewide (California)

At an aggregate statewide level, the analysis found statistically significant increases in residential real estate valuation at all distances after construction of the proximal wireless sites. However, not all of these valuation variations were economically significant.

Coefficient of determination ( $R^2$ ) for the statewide analysis was very high at 0.97 – in other words, this analysis accounts for nearly 100% of all observed effects on valuation from wireless site deployment near the subject properties.

Statewide, real estate valuation increases from proximal wireless sites ranged from +0.03% (within 0.1 kilometers of a wireless site) to +2.14% (at distances from 8.4 km to 8.9 kilometers). For purposes of illustration: California's median single-family home price in 2020 was \$758,990 thus the price premia found in the analysis would result in valuation increases ranging from \$228 (0.03%) to \$16,242 (2.14%).

The oft-cited 20% reductions in valuation are not evident in the statewide analysis, nor in any of the metropolitan region analyses.

## Statistical Significance of Metro Areas

Of the sixteen metropolitan regions analyzed, six regions showed no statistical significance; i.e. wireless sites proximal to residential real estate had no impact on valuation. The six metro regions showing no statistical significance in the analysis were:

- Stockton, Lodi
- Salinas, Monterey
- Santa Cruz, Capitola, Aptos, Watsonville
- Bakersfield
- Vallejo, Fairfield
- Visalia, Porterville
- Napa

### Sacramento CA Metro Area

In the Sacramento metro area (Sacramento, Roseville, Arden-Arcade), the analysis found increases in residential real estate valuation after construction of proximal wireless sites.

Looking at 3,796,728 transactions, the valuation variation ranged from +0.01% (within 0.1 km of the wireless site) to +0.53% (at distances from 6.0 km to 6.4 km).

R<sup>2</sup> for the Sacramento metro area analysis was 0.92. The oft-cited 20% reductions in valuation are not evident in the Sacramento metro area results.

### San José CA Metro Area

In the San José metro area (San José, Sunnyvale, Santa Clara), the analysis found no valuation effects within 0.4 km, and increases in residential real estate valuation at distances greater than 0.5 km, after construction of the subject wireless sites.

Looking at 3,612,141 transactions, the valuation variation ranged from +0.01% (beginning at 0.5 km from the wireless site) to +0.47% (at distances from 8.0 km to 9.0 km).

R<sup>2</sup> for the San José metro area analysis was 0.93. The oft-cited 20% reductions in valuation are not evident in the San José metro area results.

## San Francisco CA Metro Area

In the San Francisco metro area (San Francisco, Redwood City, South San Francisco), the analysis found slight decreases, but also increases, in residential real estate valuation after construction of proximal wireless sites.

Looking at 3,378,178 transactions, the valuation variation ranged from -0.11% (at distances from 0.7 km to 0.9 km from the wireless site) to +3.73% (at distances from 9.1 km to 9.3 km). The decreases observed are not economically significant.

R<sup>2</sup> for the San Francisco metro area analysis was 0.90. The oft-cited 20% reductions in valuation are not evident in the San Francisco metro area results.

## Oakland CA Metro Area

In the Oakland metro area (Oakland, Hayward, Berkeley), the analysis found increases in residential real estate valuation at all distances after construction of proximal wireless sites.

Looking at 628,836 transactions, the pricing variation ranged from +0.08% (within 0.1 km of the wireless site) to +3.25% (at 10.0 km from the wireless site).

R<sup>2</sup> for the Oakland metro area analysis was 0.92. The oft-cited 20% reductions in valuation are not evident in the Oakland metro area results.

## Santa Rosa CA Metro Area

In the Santa Rosa metro area, the analysis found slight decreases, but also slight increases, in residential real estate valuation after construction of proximal wireless sites.

Looking at 120,937 transactions, the pricing variation ranged from -0.52% (at distances from 2.3 km to 2.7 km from the wireless site) to +0.05% (at distances from 7.5 km to 7.9 km).

R<sup>2</sup> for the Santa Rosa metro area analysis was 0.94. The oft-cited 20% reductions in valuation are not evident in the Santa Rosa metro area results.

## Fresno CA Metro Area

In the Fresno metro area, the analysis found increases in residential real estate valuation after construction of proximal wireless sites.

Looking at 18,438 transactions, the pricing variation ranged from +0.25% (within 0.1 km of the wireless site) to +3.94% (at distances from 4.4 km to 4.6 km).

R<sup>2</sup> for the Fresno metro area analysis was 0.97. The oft-cited 20% reductions in valuation are not evident in the Fresno metro area results.

## Santa Barbara CA Metro Area

In the Santa Barbara metro area (Santa Barbara, Santa Maria), the analysis found increases in residential real estate valuation after construction of proximal wireless sites.

Looking at 15,630 transactions, the pricing variation ranged from +0.10% (within 0.1 km of the wireless site) to +2.56% (at distances from 5.0 km to 5.5 km).

R<sup>2</sup> for the Santa Barbara metro area analysis was 0.98. The oft-cited 20% reductions in valuation are not evident in the Santa Barbara metro area results.

## Modesto CA Metro Area

In the Modesto metro area, the analysis found increases in residential real estate valuation after construction of proximal wireless sites.

Looking at 15,123 transactions, the pricing variation ranged from +1.00% (within 0.1 km of the wireless site) to +16.22% (at distances from 3.7 km to 3.8 km).

R<sup>2</sup> for the Modesto metro area analysis was 0.92. The oft-cited 20% reductions in valuation are not evident in the Modesto metro area results.

## San Luis Obispo CA Metro Area

In the San Luis Obispo metro area (San Luis Obispo, Paso Robles, Arroyo Grande), the analysis found slight decreases, but also increases, in residential real estate valuation after construction of proximal wireless sites.

Looking at 9,831 transactions, the pricing variation ranged from -0.27% (at distances from 1.7 km to 2.1 km from the wireless site) to +0.91% (at distances from 9.3 km to 9.5 km).

R<sup>2</sup> for the San Luis Obispo metro area analysis was 0.98. The oft-cited 20% reductions in valuation are not evident in the San Luis Obispo metro area results.

## Discussion

### Economic Significance of Pricing Variations

While some pricing variation was found to be statistically significant, not all variations were economically significant. Economic significance could be interpreted as any variation above the 1 - R<sup>2</sup> level, however for purposes of this study, the researchers considered pricing variations over 1% to be economically significant. Variations could be due to factors that this analysis did not consider including weather, crime trends, stock market fluctuations, or population migration trends.

Example: In our study, the maximum valuation decrease was -0.52% (Santa Rosa metro area). The median listing sold price in Santa Rosa CA (Jan 2020, per the National Association of REALTORS® website) was \$571,000. A pricing variation of -0.52% would equate to a valuation decrease of \$2,969.

The study found three metro areas with statistically significant valuation decreases, but no metro areas with economically significant valuation decreases. The study found six metro areas with economically significant valuation increases: San Francisco (+3.73%), Oakland (+3.25%), Fresno (+3.94%), Santa Barbara (+2.56%), and Modesto (+16.22%).

Metro Area	Lowest Variation	Highest Variation	R <sup>2</sup>
Sacramento	+0.01%	+0.53%	0.92
San José (South Bay)	+0.01%	+0.47%	0.93
San Francisco	(-0.11%)	+3.73%	0.90
Oakland (East Bay)	+0.08%	+3.25%	0.92
Santa Rosa	(-0.52%)	+0.05%	0.94
Fresno	+0.25%	+3.94%	0.97
Santa Barbara	+0.10%	+2.56%	0.98
Modesto	+1.00%	+16.22%	0.92
San Luis Obispo	(-0.27%)	+0.91%	0.98

Table 1 : Valuation Variation Ranges and Coefficients of Determination, by Metro Area

## Refutation of the “20% Reduction in Valuation” Assertion

An article appeared in *The Appraisal Journal*, (Summer 2005) authored by Sandy Bond, Ph.D. and Ko-Kang Wang that asserted wireless towers could result in a 20% reduction in residential real estate valuations. Reviewing this article reveals that Bond and Wang used a survey methodology to collect data, citing sources (including self-citations to Bond’s own work) that recommended surveys as a valid methodology. In practice, surveys are poor methodologies for analyzing market economics as they are subject to respondent bias, participation bias, sampling bias, and a host of other factors. There is also evidence that Dr. Bond was consulting in 2005 for the Porirua Residents’ Action Group in Wellington, NZ, and that this group was actively opposed to wireless tower deployments in the area. <sup>[9]</sup> Dr. Bond’s financial relationship with the PRAG (if any) is unknown.

Despite the relative weakness of surveys compared to objective market studies (JVSV 2012, Valbridge 2018, Maennig 2010) the extant belief that wireless sites have negative impacts on real estate valuations persists in the real estate community, and is often cited by resident groups opposed to wireless site deployments. These negative valuation impacts are not evident in this study’s analysis. Indeed, no economically significant valuation decreases are evident in our study.

## Demographic Shifts in Attitudes toward Wireless Sites

As evidenced by the CDC’s Wireless Substitution reports <sup>[4]</sup> younger people rely more heavily on wireless devices for their daily lives. Per the CDC’s report as of December 2019, over 75% of U.S. adults under age 34 rely solely on their wireless devices for telephone calls. Younger generations, sometimes referred to as “Millennials” or “Generation Z”, are now the dominant economic demographic in the U.S. and are increasingly the dominant economic force in real estate markets. An article in the National Association of REALTORS® magazine stated that, after the onset of the SARS-CoV-2 pandemic, 69% of real estate professionals reported that prospective buyers sought information about a home’s access to connectivity, including wireless coverage. <sup>[10]</sup> The article also stated that 62% of real estate agents believe that within one to two years, 5G home internet (an alternative to DSL, fiber, or cable broadband) will be something they will advertise during the sale process. Younger buyers’ attitudes towards wireless infrastructure stand in somewhat sharp contrast to members of older generations that have traditionally formed the core of opposition to wireless site deployments in and around neighborhoods.

The SARS-CoV-2 pandemic forced a major societal shift in attitudes toward remote work, distance learning, telehealth, online shopping, and delivery services. Many of these shifts will remain, and real estate professionals should expect that, going forward, residents will expect their wireless networks to support the increased levels of wireless data usage we observed during the pandemic.

## Possible Distortions of the Study Data

The datasets for this study's analysis were purely objective. They comprise the entirety of one wireless carrier's small cell deployments from 2010 to 2020, and the entirety of real estate transactions in the state of California over the same time period. The  $R^2$  values for the observed results are very high, at 0.90 or better, indicating that the observed effects on residential real estate valuation are largely explained by the spatial difference-in-differences approach. Nevertheless, for completeness, we note some possible external effects on the study data.

### Carrier Operational Economics

The most likely distortion of the results is due to the operational economics of wireless carriers. As for-profit companies, wireless carriers must weigh the cost of building a given wireless site against the carrier's ability to realize a return on investment. Costs associated with wireless deployments are often significant, and realizing a return on investment from deployments in economically-challenged neighborhoods or areas with low population is challenging. If the wireless sites in the study data were deployed more in economically-advantaged neighborhoods, and economically-challenged neighborhoods in the control group were not targets for wireless site deployment, the relative strength of the economically-advantaged neighborhoods chosen for deployment could be affecting the results.

### Economic Impacts of the SARS-CoV-2 Pandemic

Because the datasets covered the time period from 2010 to 2020, it is possible that the economic effects of the SARS-CoV-2 pandemic (beginning in early 2020) had some (albeit minimal) effect on the analysis. During the pandemic in 2020, people migrated away from large cities to smaller cities and suburban areas.<sup>[11]</sup> Despite massive corrections to the economy and significant unemployment due to business closures, real estate transactions rose sharply and valuations increased. It is possible that the 2020 real estate valuation increases could be affecting the results, however given that the study looked at a full decade of transactions, a statistically significant effect from pandemic-driven migration is unlikely.

### Racial, Cultural, Age, and Other Factors

The real estate transaction dataset used for this study does not contain information about buyer demographics. Thus, it is impossible to determine if there are demographic effects in the study results. It may be, for example, that younger buyers (who tend to place higher value on network connectivity) will place a higher valuation on a real estate opportunity that has strong wireless coverage. And it may be that some racial, cultural, or other demographic groups will place higher or lower value on

network connectivity. To help offset this, the researchers studied a large number of metropolitan areas across the state, but in the end, we note that buyer demographics are an uncontrollable variable in this study.

## Contradictory Evidence Review

We reviewed previous studies and articles that claimed to find negative impacts to residential real estate valuation. In many cases, these works were not openly available in the peer-review systems.

### Bond/Wang 2005

We were able to review a copy of Bond and Wang's article, *The Impact of Cell Phone Towers on House Prices in Residential Neighborhoods*, in *The Appraisal Journal* (Summer 2005) although we note that this article is behind a subscriber paywall. We noted that Bond/Wang's methodology used surveys, which have inherent issues with respondent bias, participation bias, sampling bias, and a host of other factors.

### Affuso/Cummings/Le 2017

We attempted to review the work of Ermanno Affuso, J. Reid Cummings, and Huubinh Le from University of South Alabama. Their paper, *Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis*, in *The Journal of Real Estate Finance and Economics* (May 2018) appears (from what we could derive from the paper abstract) to be the closest approximation to our study, with the exception that Affuso et al. analyzed effects from macro towers not small wireless facilities. The National Association of REALTORS® links to Affuso et al. 2017 from their "Cell Phone Towers" subpage, but via a NAR member registration wall.<sup>[12]</sup> Requests to Affuso et al. for a courtesy/peer copy of their paper did not receive a response.

### National Association of REALTORS® Website

The NAR also links to *The Impact of Cell Phone Towers on House Prices: Evidence from Brisbane, Australia* (Environmental Economics and Policy Studies, Jan. 1, 2018) which again is behind a member registration wall. NAR links to *Property values, desirability and cell towers* (EMFSA, website) an anti-EMF activist group which cites both the survey work from Bond/Wang 2005, and a survey conducted in June 2014 by the National Institute for Science, Law and Public Policy (NISLAPP) in Washington, D.C.<sup>[12]</sup>

## Conclusions

Across a wide geographic area, using a decade of wireless facility and real estate transaction data, our analysis found effectively zero statistical evidence that proximal small wireless communication facilities or “small cells” negatively impact residential real estate valuations. In fact, there is some evidence that residential real estate valuations increase within 10 km after construction of a small wireless facility. In cases where there is a statistically significant negative impact, the impact is not economically significant.

We note that the body of evidence asserting to show negative impacts to residential real estate from wireless communication facilities appears to come largely from survey-based methodologies. Where previous work has claimed to find negative valuation impacts, there appears to be very little if any available for peer-review. We encourage researchers on this topic to open their work to peer-review and scrutiny.

Support for the extant belief held by some real estate agents that wireless sites near residences can cause residential property devaluations of up to 20% is not evidenced by this study.

## About the Researchers

### David Witkowski, Joint Venture Silicon Valley

Witkowski is an author, advisor, and strategist who works at the intersection between local government and the telecommunication industry. He is the Executive Director of the [Civic Technologies Initiative](#) at Joint Venture Silicon Valley, a Fellow in the Radio Club of America, an IEEE Senior Member, and the Founder & CEO of [Oku Solutions LLC](#). After serving in the U.S. Coast Guard and earning his B.Sc. in Electrical Engineering from the University of California, he held leadership roles for companies ranging from Fortune 500 multi-nationals to early-stage startups. He serves as Co-Chair of the Deployment Working Group at IEEE Future Networks, Co-Chair of the GCTC Wireless SuperCluster at NIST, as a member of the Connected Communities Forum in the Wireless Broadband Alliance, and as an Expert Advisor to the California Emerging Technology Fund.

### Dr. Ralph B. McLaughlin, Chief Economist and Senior Vice President of Analytics, Haus

In December 2019, McLaughlin was named Chief Economist and Senior Vice President of Analytics at Haus. He is responsible for leading economic research using data and analytics to expand the visibility of the Haus economic policy unit while enhancing research capabilities and tools for consumers, industry professionals, the public sector and news media.

McLaughlin has nearly two decades of experience in the housing and mortgage market. Prior to joining Haus, he served as Chief Economist at Trulia, as Deputy Chief Economist at CoreLogic, as an Assistant Professor in Real Estate Development at San Jose State University, and as a Lecturer at the University of South Australia. He was also recently appointed as an Adjunct Assistant Professor in the Price School of Public Policy at the University of Southern California, where he teaches a masters course in urban economics.

McLaughlin frequently appears on local and national radio and television programs, and has been widely quoted in *The Wall Street Journal*, *New York Times*, *Washington Post*, *USA Today*, and *Los Angeles Times* as well as numerous industry trade publications such as *HousingWire* and *National Mortgage News*. He has appeared as a regular guest on cable news channels including *CNBC*, *Bloomberg*, and *Fox Business News*.

McLaughlin earned a Ph.D. in Planning, Policy, and Design, specializing in Urban Economics, from the University of California at Irvine, and a B.S. in Geography and Regional Development from the University of Arizona.

## Acknowledgements

### Richard Lombardi and Damien Weldon

Lombardi and Weldon's sponsorship and support of this project was key to completing the study. This study is based in part on data provided by Black Knight Data & Analytics, LLC who generously provided the real estate transaction dataset for this study.

Black Knight (NYSE:BKI) is a leading provider of integrated software, data and analytics solutions that facilitate and automate many of the business processes across the homeownership life cycle. Black Knight is committed to being a premier business partner that clients rely on to achieve their strategic goals, realize greater success and better serve their customers by delivering best-in-class software, services and insights with a relentless commitment to excellence, innovation, integrity and leadership.

### Radha Sharma

Sharma and her team at Verizon Wireless have been consistent supporters of the Wireless Communications Initiative at Joint Venture Silicon Valley, and they worked tirelessly to navigate the legal and contractual process with Verizon's legal team in order to provide us with the wireless site dataset.

## Bibliography

- [1] Wikipedia, "Moore's Law," [Online]. Available: [https://en.wikipedia.org/wiki/Moore%27s\\_law](https://en.wikipedia.org/wiki/Moore%27s_law). [Accessed 11 June 2021].
- [2] World Bank, "Are cell phones becoming more popular than toilets?," 26 August 2019. [Online]. Available: <https://blogs.worldbank.org/opendata/are-cell-phones-becoming-more-popular-toilets>. [Accessed 09 June 2021].
- [3] NENA - The 9-1-1 Association, "9-1-1 Statistics," [Online]. Available: <https://www.nena.org/page/911Statistics>. [Accessed 09 June 2021].
- [4] National Center for Health Statistics, "Wireless Substitution: Early Release of Estimates Jan-Jun 2020," U.S. Department of Health and Human Services, Centers for Disease Control, Washington, D.C., 2020.
- [5] Ericsson, "Ericsson Mobility Report," Telefonaktiebolaget LM Ericsson, Stockholm, Sweden, 2020.
- [6] Joint Venture Silicon Valley, "Wireless Facilities Impact on Property Values," Joint Venture Silicon Valley, San José, CA, 2012.
- [7] Valbridge Property Advisors, "Valbridge Market Studies," Valbridge Property Advisors, Naples, FL, 2018.
- [8] W. Maennig and S. Brandt, "Perceived Externalities of Cell Phone Base Stations – The Case of Property Prices in Hamburg, Germany," Universität Hamburg, Hamburg, DE, 2010.
- [9] California State University, Fullerton CA, "Curriculum Vitae: Dr Sandy Bond," [Online]. Available: <https://fullerton.academia.edu/SandyBond/CurriculumVitae>. [Accessed 21 June 2021].
- [10] National Association of REALTORS, 14 May 2021. [Online]. Available: <https://magazine.realtor/daily-news/2021/05/14/5g-network-availability-becomes-major-selling-point-for-homes>. [Accessed 10 June 2021].
- [11] J. K. Dineen, "San Francisco Chronicle," 18 February 2021. [Online]. Available: <https://www.sfchronicle.com/bayarea/article/People-are-leaving-S-F-but-not-for-Austin-or-1595527.php>. [Accessed 11 June 2021].
- [12] National Association of REALTORS(r), "NAR: Cell Phone Towers," [Online]. Available: <https://www.nar.realtor/cell-phone-towers#section-165807>. [Accessed 21 June 2021].



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## Verizon Wireless's Responses Volume 2

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### 1. GAP CONTINUED

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**Project opponents allege that there is no significant gap, claiming phones can shift frequencies, so a gap in a particular frequency is not important.**

Prior to submitting this application, Verizon Wireless network engineers determined there was a gap in coverage and capacity in the area. PierCon Solutions, a third-party engineering firm, conducted a drive test, reviewed Verizon Wireless's data, and confirmed the gap. Staff Report, Att. 7, pp. 159-235; Att. 8, p. 238. After Verizon Wireless submitted its application, the City hired CTC Telecommunications Network Consulting "to conduct a third-party review of the technical aspects of the Verizon application." *Id.*, Att. 10, p. 286. The Code and Guidelines include rigorous submittal requirements, including drive test and dropped call data. Wireless Application Checklist Types I-V, Section 15.2.1. PierCon validated the drive test data, stating that the "data collected was performed utilizing a calibrated receiver and industry standard equipment" and included the certificate of calibration. PierCon Suppl. Rpt. 2, p. 3 and Exh. 7. Verizon Wireless provided all the required data, which CTC examined and "performed [their] own independent technical analysis to reach conclusions about the application." Staff Report, Att. 10, p. 286. CTC concluded that:

Verizon has provided credible evidence of existing wireless service deficiencies in the target area due to overloaded traffic in the 700/850 MHz bands and high levels of signal interference, causing unacceptably high dropped connections/calls. This means the available signal does not actually deliver an acceptable quality of wireless service today. Additionally, Verizon has shown the area to be served by the small wireless facility lacks reliable 5G service.

*Id.*, Att. 10, p. 287.

In its January 30, 2026, Supplemental Report #2, PierCon has provided best server plots that show the coverage that each wireless facility is contributing to the network. PierCon Suppl. Rpt. 2, pp. 2-3 and Exhs. 1-2. Best server maps show which Verizon Wireless facility provides the best signal to a certain area. Signal from each antenna sector of a facility is shown in a different color. The best server maps predict which antenna sector generally provides the strongest signal to user devices in a particular location, even if weak and inadequate for reliable service.

As can be seen in PierCon's Exhibits 1 and 2, the areas around the proposed facility are white, which indicates that there is no dominant signal in the area. PierCon Suppl. Rpt. 2, Exhs. 1-2. Dominant signal is signal that is strong enough to exceed interfering signal levels from other Verizon Wireless facilities and radio frequency noise from other sources. Where there is dominant signal, users can reliably access the network.

Where there is no dominant signal, service is unreliable. Phones cannot shift to other frequencies if they are not available.

**What will be the coverage provided by Verizon Wireless small cells 002 and 005, located in the County? When will they be on air?**

PierCon has supplemented its original report to explain the coverage expected to be provided by small cells 002 and 005. PierCon Suppl. Rpt. 2, pp. 2-3 and Exhs. 1-2. While those two sites will provide additional coverage when they are constructed, they will not alleviate the need for the proposed facility. *Id.* These sites are currently in process. They will be scheduled for construction as soon as the relevant third parties have provided the required infrastructure for the sites to be operational.

**What is the status of Verizon Wireless's Lobos Ridge site?**

Verizon Wireless is continually reviewing its network and optimizing based on need, usage, and changing circumstances. At this time, there is not an active decommission project for this site. It has been superseded by subsequent network upgrades.

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**2. ALTERNATIVES**

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**The Commission and project opponents inquired about the feasibility of a wireless facility at the Golden Bough Theatre or the Water Treatment Plant (Carmel Area Wastewater District) in the County.**

PierCon has provided a thorough analysis of the Golden Bough site, which both the City and CTC have confirmed, finding that this site is too far from the gap and causes interference with existing and proposed sites. Staff Report, p. 162; Att. 7, pp. 175-177; Att. 10, pp. 303-304; PierCon Suppl. Rpt. 2, pp. 6-7 and Exh. 6. PierCon found that the mature trees near the site would "significantly attenuate mid-band signals." *Id.* at pp. 6-7 and Exh. 6. Separately, Sequoia Deployment Services has visited the Golden Bough Theatre with the landlord to evaluate the feasibility of a potential wireless facility.

PierCon has provided a thorough analysis of the Golden Bough site, which both the City and CTC have confirmed, finding that this site is too far from the gap and causes interference with existing and proposed sites. Staff Report, p. 162; Att. 7, pp. 175-177; Att. 10, pp. 303-304; PierCon Suppl. Rpt. pp. 6-7 and Exh. 6. PierCon found that the mature trees near the site would "significantly attenuate mid-band signals." *Id.* at pp. 6-7 and Exh. 6.

Separately, Sequoia Deployment Services met with the Golden Bough Theatre on February 4, 2026, to evaluate the property to determine whether there is any equipment configuration that could satisfy the landlord and comply with City requirements. A facility with ground equipment and rooftop antennas is constructable. Space inside the building for equipment is not available due to heat and noise generation. During this visit, PreVisualists, Inc., flew a drone at the proposed antenna location and elevation to evaluate if there is clean line of sight from the antenna location to the coverage area. The photo attached as [Exhibit A](#) facing the coverage objective confirms substantial tree cover at the proposed antenna elevation, irrespective of whether omnidirectional or high gain, narrow-beam directional antennas focused on the coverage area are modeled. These trees would obstruct the signal from the antenna, preventing it from serving the coverage area. Furthermore, it is unknown at this time if agreeable lease terms can be obtained for a facility at this location.

Verizon Wireless has been trying to provide service around the wastewater district property since 2012. Verizon Wireless could not negotiate a lease with the landlord for a macro wireless facility on that property. Part of the difficulty with the wastewater site is that rights to use the access road would be required from California State Parks. That agency is unlikely to approve any development on public lands on the west side of Highway One. Even if Verizon Wireless was to somehow overcome these issues with the landlord and access road, Monterey County is unlikely to approve a permit due to the location and potential impacts on views as well as requirement related to existing eucalyptus trees. Verizon Wireless has unsuccessfully revisited this site several times over the intervening years.

Theoretically, if Verizon Wireless were able to secure the approvals required to construct a macro wireless facility at the wastewater district property, it is located too far south to provide coverage for the gap area that the proposed site seeks to fill. As PierCon has explained in its January 30, 2026, Supplemental Report, even assuming an antenna height of 67 feet on a 75-foot-tall tower, a macro tower at the wastewater district “does not contribute reliable signal level to the service gap area.” PierCon Suppl. Rpt. 2, p. 6 and Exh. 5.

**We also received questions inquiring about Verizon Wireless’s ability to buy more bandwidth and avoid the low band constraint and optimizing existing sites.**

Spectrum and bandwidth are limited resources, which the FCC auctions off every few years. Even if additional bandwidth were available for purchase, PierCon explains why that would not address the underlying cause of the service gap. PierCon Suppl. Rpt. 2, pp. 4-5.

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### 3. DESIGN

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**Verizon Wireless was asked about whether the accessory equipment can be reduced. For example, does Verizon Wireless need both 5G and mid-band.**

As PierCon explains in its supplemental report, Verizon Wireless “designs its network to operate across its full portfolio of FCC-licensed frequency bands to provide reliable and continuous service.” PierCon Suppl. Rpt. 2, p. 7. If the proposed facility proceeded with only 5G/C-Band, Verizon Wireless would have to install additional small cells in the area. *Id.*

Verizon Wireless could potentially install an alternative configuration that would eliminate C-Band radio from the largest cabinet and reconfigure it to three integrated radio antennas on a mid-mount cross-arm. The total volume of equipment would be reduced by .24 cubic feet. However, we believe this design is disfavored by most communities, as placing antennas lower on the pole is generally considered to have greater impacts since its closer to an average person’s line of sight. There is greater tree blockage at this height as well, further impeding the signal. PG&E would also have to approve the design. Mounting the antennas at this lower height would also result in less coverage. Absent the relocation of the C-Band antennas, eliminating one radio, likely providing AWS and PCS service, will prohibit the proposed facility from fulfilling its coverage objective. PierCon Suppl. Rpt. 2, p. 7. The end result is that Verizon Wireless will have to install more facilities to fill the gap. *Id.*

**The public commented that future collocations on this pole can proceed with minimal review by the City.**

We note that eligible facilities requests, or 6409 requests, are contemplated by the Code as Type V sites. Any consideration of such requests is purely speculative at this point, especially in light of the PG&E and California Public Utilities Commission regulations governing wireless facilities on this pole. Furthermore, Type V sites

require both an administrative use permit and a building permit. Code § 17.46.050(A)(2)(a). Administrative use permits are reviewed by the planning director and appealable to the City Council. Code § 17.46.050(A)(2). Consequently, the City will thoroughly review any future applications.

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**4. ENVIRONMENTAL REVIEW CONTINUED**

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Project opponents also claim that *United Keetoowah Band of Cherokee Indians in Oklahoma v. FCC*, 933 F.3d 728 (D.C. Cir. 2019) invalidated the FCC rule that Verizon Wireless cited for NEPA exclusion. The *Keetoowah* case invalidated an FCC 2018 exclusion for small cells. Verizon Wireless cited the prior exclusion for certain wireless facilities, 47 C.F.R. § 1.1306(c)(1), which pre-dates the FCC order and is still effective. Verizon Wireless has fully complied with NEPA by self-certifying pursuant to 47 C.F.R. Part 1, Appendix B, Stipulation VI – A – C.

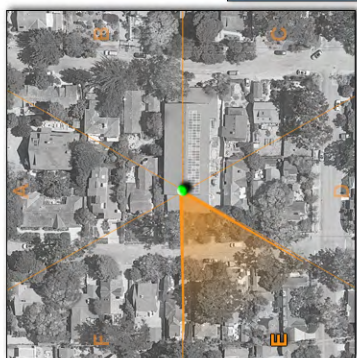
# EXHIBIT A

## Golden Bough

Monte Verde Street  
Carmel-By-The-Sea, CA



S Carmel 001



This is a line-of-sight graphic which indicates which locations are visible from the top of the faux chimney. Only locations that have a direct line of sight toward the installation can be seen in this view. If a specific location is not visible, then from that location the faux chimney will not be visible.

Photograph from a drone looking out from the top of the proposed chimney, looking to the southwest from 7 ft above the ridgeline.

Southwest



January 30, 2026

*Via Electronic Mail*

**To:** Honorable Chair, Vice Chair and Members of the Carmel-by-Sea Planning Commission  
([mlepage@ci.carmel.ca.us](mailto:mlepage@ci.carmel.ca.us); [slocke@ci.carmel.ca.us](mailto:slocke@ci.carmel.ca.us); [eallen@ci.carmel.ca.us](mailto:eallen@ci.carmel.ca.us);  
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**From:** Ariel Strauss, on behalf of neighbors of Carmelo Street 3rd NE

**Subject:** Letter Regarding Potential Site Build-Out (DR 25313 & UP 25314 for Verizon/Sequoia Development Wireless Facility, Carmelo Street)- Feb. 4, 2026, Meeting

Dear Chair LePage, Vice Chair Locke and Commissioners Ahlborn, Allen and Karapetkov:

Please accept this letter on behalf of neighbors of Carmelo Street 3rd NE opposing Verizon Wireless/Sequoia Development's application for DR 25313 and UP 25314.

On January 20<sup>th</sup> and 21<sup>st</sup>, I submitted three letters detailing deficient environmental review, inadequate tree root protections, design standards non-compliance and Verizon failing to demonstrate an "effective prohibition" of wireless service. The letters included a copy of the City Council's December 7, 2021, meeting minutes explaining its denial of Verizon's La Playa application, which applies equally here. I additionally provided a diagram showing design violations and an expert report from Robert Beegle III evaluating PierCon's RF Report. Mr. Campanelli also submitted a legal brief and exhibit with numerous resident letters and opinions from local real estate professionals attesting to the negative property value impact. I urge you to review those materials.

This current letter addresses the potential build-out of the proposed facility.

**Federal Law and Utility Pole Rules Enables Very Significant, Incompatible Facility Expansion**

In my *Letter Regarding Tree Protection, Historic Preservation and Environmental Review Deficiencies* (pp.3-4), I described how federal law, and the City's Type V application process implementing federal law, dictates that if the Commission approves an installation that a

reasonable person would recognize as a wireless facility, Verizon or any future applicant can upgrade the antennas and associated equipment, or install additional antennas, even if those additions violate the City's design standards and zoning limitations. (See, C.M.C. § 17.46.080(B); 47 U.S.C. § 1455(a)(1).) The applicant could add up to 6 feet horizontally and 10 feet vertically without any volumetric limits on pole attachments, and install utility cabinets on the ground for radios or other equipment. (47 C.F.R. § 1.6100(b)(7); *League of California Cities v. FCC*, 118 F. 4th 995, 1010 (9th Cir. 2024).) Unlike for the current Type III application, for Type V applications, the City cannot demand that the equipment installer to demonstrate a significant gap in coverage or otherwise justify the service provided by the modification.

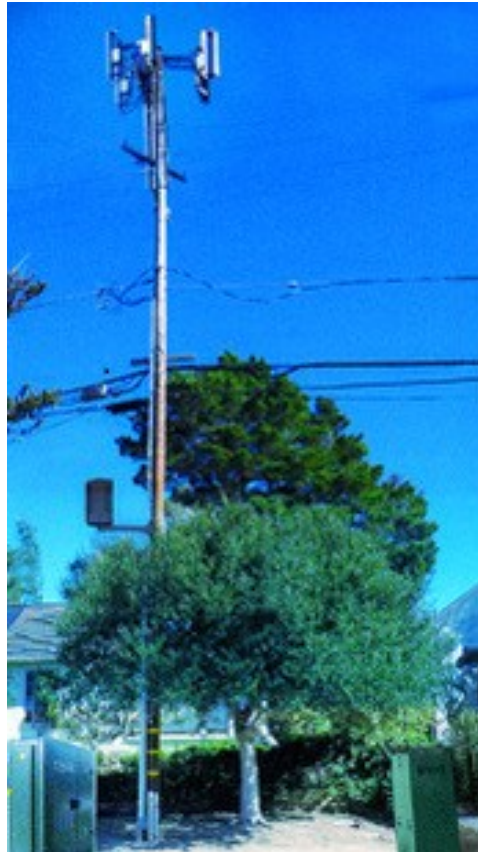
At the January 21<sup>st</sup> hearing, Verizon's attorney, Paul Albritton, argued that such expansion is unrealistic because there are limitations imposed by the pole owner, PG&E. However, these limits do not prevent the facility from violating the City's standards, becoming incredibly unsightly, generating visual clutter, devaluing adjacent properties and imposing an industrial-looking eyesore totally incompatible with the adjacent historically-designated home. Specifically, PG&E rules and California Public Utilities Commission General Order 95 would allow replacing the current side-mounted cabinet with a multi-panel antenna array and the single top-mounted canister with multiple antennas.<sup>1</sup> The existing cabinet, plus additional cabinets or a single expanded cabinet, would then be installed on the ground in the right-of-way next to the property line.

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<sup>1</sup> This configuration would be feasible because GO-95 requires 2' of clearance from the top of the side-mounted antenna to the communication lines (Rule 94.4(B)) and 18' minimum elevation from the ground to the antenna mounting arm (Rule 94.4(G); Table 1, Case 3, Column B). The side-mounted antenna could be installed in the area currently occupied by the cabinet and separation distance. Adding additional antennas atop the pole does not increase the 6' separation distance afforded above the power lines currently required by GO-95. A link to GO-95 is available here:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf>.

Here is a crude depiction of a modification that shows a single canister side-mounted, which is copied from a high-band 5G canister antenna that Verizon is currently deploying in San Mateo, and additional antennas atop the pole:



The side-mounted configuration could be far worse if directional antennas were installed instead or added over time, as in this example of a current facility on a PG&E pole in the right of way in Contra Costa County:



In addition to being much more obtrusive to street-level residents, the top-mounted antennas would also block views and be extremely conspicuous to residents living on Camino Real St. and Casanova St as discussed in *Letter Regarding Adverse Visual Impacts and Design Violations* (pp. 4-5).

The true limitations on expansion are imposed by (1) the cost and difficulty of wireless service providers accessing alternatives sites in Carmel, (2) the business and technical preferences of these providers and (3) the structural capacity of the pole. State law mandates that a standard wireless permit duration be at least 10 years “absent public safety reasons or substantial land use reasons.” (Gov. Code § 65964(b).) Unless the Commission imposes a shorter duration to protect against modifications, it is impossible to anticipate the business and technological changes over the coming 10 years that might motivate carriers to modify this site. However, the conventional wisdom is that demand for wireless data and broadband service is growing. The limitations on new sites imposed by the City’s ordinance and the City’s residential zoning dictate that carriers will look first to collocate or modify an existing site. From an engineering standpoint, the new Class 1 pole emplaced 8’ 8” into the ground is capable of bearing a considerable amount of weight.

<u>Class</u>	<u>Horizontal Load (lb)</u>	<u>General Industry Use</u>
10	370	↑ <b>Telecom Only Poles</b> ↓
9	740	
7	1,200	
6	1,500	
5	1,900	↑ <b>Distribution</b> ↓
4	2,400	
3	3,000	↑ <b>Transmission</b> ↓
2	3,700	
1	4,500	
H1	5,400	
H2	6,400	
H3	7,500	
H4	8,700	
H5	10,000	
H6	11,400	

<sup>2</sup> [https://woodpoles.org/wp-content/uploads/WoodPoleCode\\_Overview.pdf](https://woodpoles.org/wp-content/uploads/WoodPoleCode_Overview.pdf)

Groundline Load Summary - Reporting Angle Mode: Load - Reporting Angle: 269.3°										
	Shear Load* (lbs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (lbs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
Powers	573	39.1	18,299	48.5	39.9	734	358	2	736	39.7
Comms	77	5.2	1,939	5.1	4.2	78	133	1	79	4.2
GuyBraces	15	1.0	461	1.2	1.0	19	9	0	19	1.0
GenericEquipments	306	20.9	6,212	16.5	13.6	249	527	3	252	13.6
Pole	355	24.3	8,146	21.6	17.8	327	2,057	13	339	18.3
Crossarms	3	0.2	90	0.2	0.2	4	80	0	4	0.2
Risers	124	8.5	2,099	5.6	4.6	84	129	1	85	4.6
Insulators	13	0.9	493	1.3	1.1	20	54	0	20	1.1
Pole Load	1,465	100.0	37,740	100.0	82.4	1,514	3,348	20	1,534	82.8
Pole Reserve Capacity			8,074		17.6	339			318	17.2

Load Summary by Owner - Reporting Angle Mode: Load - Reporting Angle: 269.3°										
	Shear Load* (lbs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (lbs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
<Undefined>	1,109	75.7	29,594	78.4	64.6	1,187	1,291	8	1,195	64.5
Pole	355	24.3	8,146	21.6	17.8	327	2,057	13	339	18.3
<b>Totals:</b>	1,465	100.0	37,740	100.0	82.4	1,514	3,348	20	1,534	82.8

Verizon’s load bearing calculations show thousands of pounds of allowable reserve capacity. Additionally, the shroud-cabinet with radio equipment weighs hundreds of pounds, which could be relocated off the pole. As a result, the pole could support multiple antenna attachments.

**Facility Expansion and Potential Facility Expansion is Obviously Detrimental to the Value of Adjacent Properties**

Verizon’s attorney also argued that wireless facilities do not devalue adjacent properties. Regardless of the validity of the studies cited by Mr. Albritton, they are irrelevant to this situation. Carmel is world-renown for its beauty and charm with conscious design choices intended to emphasize village scale and character, such as narrow streets, lack of excess metal parking information or other signage, unpaved parking areas, low-profile, wooden street name posts. The houses on Carmelo Street are in exceptional condition and pristinely landscaped. Utility poles are the sole current obstruction in the area, and the attachment of a wireless facility will be highly noticeable and out of scale with those existing impositions. In fact, PG&E requires that, in addition

<sup>3</sup> [https://ci.carmel.ca.us/sites/main/files/south\\_carmel\\_001\\_attachment\\_8\\_-\\_structural\\_analysis.pdf](https://ci.carmel.ca.us/sites/main/files/south_carmel_001_attachment_8_-_structural_analysis.pdf)

to the RF exposure safety sign posted 9' below the antenna, a conspicuous entity information sign be posted above the pole-mounted meter no higher than 15' above the ground.<sup>4</sup>



People purchase homes in Carmel-by-the-Sea specifically to live in a quaint, natural setting. Unlike for towers, the wireless ordinance imposes no fall-zone setbacks on utility-pole attachments. Buyers in the current Carmel price range are highly discriminating and have numerous alternative choices. As attested to at the January 21<sup>st</sup> hearing, Realtors are required to disclose adjacent cell facilities<sup>5</sup> and sophisticated buyers will rightly worry about ugly expansion. This uncertain threat alone, perhaps most of all, scares off would-be buyers. As explained in the letters from experienced, local real estate professionals attached to Mr. Campanili's brief, the proposed installation, and any expansion to it, which the Commission will be powerless to control, will obviously be detrimental to the value of adjacent properties. And this is based solely on the out-of-place visibility of the facility without any consideration of RF health fears. The Commission, as knowledgeable local officials, has full authority, and responsibility under Code Section 17.46.080(A)(1)(a), to make a determination on this issue.

### **The Potential for Build-out Incompatible with Historic Designations Triggers Obligatory CEQA and NHPA Analysis**

As explained in my *Letter Regarding Tree Protection, Historic Preservation and Environmental Review Deficiencies* (pp. 10-11), because the Commission's approval of the permit

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<sup>4</sup> See PG&E Greenbook, Installation Details for Service to Pole-Mounted Communication Equipment, Rule 28(C) (June 30, 2023), <https://www.pge.com/content/dam/pge/docs/account/service-requests/027911.pdf>.

<sup>5</sup> This neighborhood disclosure is required in item 16 of the CAR SPQ Seller Property Questionnaire (Rev. 6/22) form.

would also enable foreseeable ministerial approval of future modifications, the impact of those modifications on the abutting historically-designated home must be considered prior to City action for City compliance with the California Environmental Quality Act and Verizon's compliance with FCC regulations implementing the National Historic Preservation Act. Obviously, expansion of the type and scale discussed above would be clearly incompatible with those statutes as well as the purposes of the City's historic designation and its preservation policies detailed in General Plan Land Use Element Policy 1-93.

## **Conclusion**

Thank you for taking the time to review my letters and scrutinizing Verizon's application materials to make the right decision under the City's ordinance and Design Guidelines. Because Verizon seeks to install a wireless facility in a "highly incompatible location," a right-of-way in single-family residential district, under Code Section 17.46.040(E) the Commission is obligated to deny the application unless Verizon demonstrates that federal or state law prohibits the City from doing so. Verizon has not met its burden and the application must be denied.

Respectfully,



Ariel Strauss

CC: Mayor Dale Byrne (dbyrne@ci.carmel.ca.us)  
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[Please find linked here the Staff Report from the January 21, 2026 Planning Commission Meeting for DR 25313 & UP 25314 \(Verizon Sequoia Deployment\).](#)

**1/21/26 Staff Report attachments**

[1. Attachment 1 - Resolution](#)

[2. Attachment 2 - Project Plans](#)

[3. Attachment 3 - Photo Sims](#)

[4. Attachment 4 - RF Compliance Report](#)

[5. Attachment 5 - Acoustic Analysis](#)

[6. Attachment 6 - Structural Analysis](#)

[7. Attachment 7 - PierCon Report](#)

[8. Attachment 8 - Technically Feasible and Available Alternatives Analysis](#)

[9. Attachment 9 - Special Exception Letters](#)

[10. Attachment 10 - CTC Report](#)

[11. Attachment 11 - Resident Correspondence](#)

**Reference Materials**

[Wireless Design Guidelines](#)

[Carmel Municipal Code Section 17.46](#)

[Wireless Application Checklist](#)